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— SPECIAL SECTION ONE —

The Origins, Development, and Characteristics of Central and Eastern European Diasporas

Magdalena Lesińska* 

The article examines the question of what shapes the process of creating diasporas in Central and Eastern Europe (CEE). It argues that a comprehensive understanding of the origins, development, and contemporary characteristics of CEE diasporas requires consideration of the region's distinctive historical experience, characterised by a history of multiethnic empires, border changes, wars, authoritarian regimes, and recurrent waves of both forced and voluntary migration. Drawing on the conceptual framework proposed by Rogers Brubaker, it highlights the internal diversity of CEE diasporas. The distinction between classic emigrant diasporas and 'accidental' diasporas, which are formed as a result of border changes rather than physical migration, serves to emphasise the significance of kin-minorities residing in neighbouring states in conjunction with emigrant communities situated abroad. The article identifies four critical historical moments – the collapse of multiethnic empires, post-World War I and II border changes, the communist period and the Iron Curtain, and post-2004 European integration – as key determinants shaping the specificity of Central and Eastern European diasporas.

Keywords: diaspora, Central and Eastern Europe, kin-minorities, diaspora policy

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Introduction

Can we identify a specific understanding of diasporas and particular policies toward diasporas in the case of Central and Eastern European (CEE) countries?¹ What shared historical experiences demonstrate the existence of common features in the process of creating diasporas in this region, in their perception by countries of origin, and consequently, in the relations between diasporas and countries of origin?

Undoubtedly, the phenomenon of diasporas in Central and Eastern Europe originates in the unique history of the region. Understanding the shared historical experiences of the CEE region is essential to comprehend not only the origins of its diasporas but also the relationships within the triad formed by diasporas, countries of origin, and countries of residence (Brubaker 1996). Shared experiences of partitions, territorial conflicts, global wars, shifting borders, authoritarian regimes, forced resettlements, and successive waves of economic and political emigration shaped the history of individual CEE countries and the region as a whole. The two world wars had a profound impact on the population structure of the entire European continent, resulting in widespread destruction and post-war border changes. Millions of people had to relocate due to fighting on the front lines and the new political order that followed. After the First World War, the Treaty of Versailles and the collapse of the Austro-Hungarian Empire placed millions of people in new nation-states, while others emigrated voluntarily in search of better living conditions. Similar processes of forced and voluntary emigration on a mass scale occurred after the Second World War and the establishment of the new post-Yalta political order.

The history of Central and Eastern Europe constitutes the history of successive waves of population movements within and outside the continent. These shared historical experiences left a strong mark on the perception of community and national identity. Although many countries in the region underwent successful democratic transformations in the 1990s and integrated into European structures (NATO, EU), historical trauma and geopolitical tensions continue to influence the contemporary politics of these countries, where diasporas play a significant role.

A common and simultaneously distinctive feature of Central European diasporas is their internal diversity. Rogers Brubaker (1996, 2001) aptly conceptualises this phenomenon by distinguishing classic emigrant diasporas, which arise from the decision to leave one's state of origin and settle in other countries for political and economic reasons, and accidental diasporas, remained outside their home country for reasons beyond their control, rather than as a result of conscious emigration.

This distinction forms the basis for understanding the phenomenon that not only emigrants – and their descendants – create diasporas in this region but also kin-minorities who live primarily in neighbouring countries. The representatives of the latter group did not experience emigration; they did not leave their homeland, but their history involves an equally, and perhaps even more, challenging experience of involuntarily existing outside their country because of border shifts after subsequent wars. In the literature on diasporas from Central and Eastern Europe, two terms denote the state from which they originate: kin-state and state of origin (Brubaker 1996; Walker 1994). The difference between them is subtle, yet important. The first term usually refers to the state's relations with ethnic and cultural minorities based on ethnocultural affinity. In contrast, the latter term emphasises relations based on legal nationality/citizenship or sovereign jurisdiction and refers primarily to the emigrant diaspora. This text employs the term state of origin as a broader term encompassing both types of diasporas: kin-minorities and emigrants.

This article outlines a thesis about four crucial moments in the history of the region that determined the emergence, development, and specificity of the diasporic communities from Central and Eastern Europe. These moments include: 1) the existence and subsequent collapse of multiethnic empires – the Austro-Hungarian and Russian empires, 2) changes in national borders following the two world wars, 3) the experience of communism and isolation, embodied by the Iron Curtain, and 4) European integration and the accession of the region's countries to EU structures.

The existence and fall of multiethnic empires

At the end of the nineteenth century, the Austro-Hungarian and Russian Empires together covered more than 60 per cent of the European continent and encompassed a significant share of its population. Both empires governed multinational, multiethnic, multicultural, and multilingual populations. Although German, Austrian, and Hungarian communities dominated the Habsburg Empire, it also included substantial populations of e.g. Slovenes, Croats, Serbs, Romanians, Czechs, Slovaks, Poles, and Jews. The Russian Empire was a similar mosaic that, in addition to Russians, included Ukrainians, Belarusians, Poles, Lithuanians, Latvians, Estonians, Finns, Tatars, Georgians, Armenians, Jews, and other groups. Moreover, the long history of both empires shares a history of population movements and the formation of diasporic communities across the world, originating in Central and Eastern Europe. This history reveals that social, economic, and political factors consistently drive common patterns of mass mobility. During this period, major emigration routes from Central and Eastern Europe to Western Europe and across the Atlantic emerged and persisted throughout the following century.

Population movements became widespread in the nineteenth century and stemmed from common sources, such as overpopulation, poverty, lack of prospects, and political repressions (Moch 1992; Walaszek 2007). To illustrate, beginning in the 1880s, Galicia witnessed the Great Emigration, a mass migration of landless peasants driven by economic hardship, pervasive rural poverty, and landlessness. Initially, this migration followed a seasonal pattern, with migrants traveling to Germany, France, and other countries undergoing the Industrial Revolution to find work. Later, the migration expanded to transatlantic destinations, primarily the United States and, to a lesser extent, Canada, Brazil, and Argentina. Transoceanic emigration routes to the Americas developed at the turn of the twentieth century and remained active until the end of the last century (Slany 1995).

Ralph Merville (1990) estimates that by 1914, approximately 10 million people had emigrated from the two empires, primarily to the United States of America. Analysing in greater detail the emigration routes of various national groups from the Russian Empire in the late nineteenth and early twentieth centuries, Merville demonstrates that the growing mobility of minority groups, especially Jews, Poles, and Lithuanians, played a significant role. Moreover, alongside economic reasons, external factors influenced this movement: the development of railway networks connecting Central and Eastern Europe with German ports, from which ships departed for America, falling travel costs, and the tsarist authorities' decision to loosen certain restrictions. Furthermore, Merville emphasises the diverse nature of emigration, which did not always remain permanent, as some departures had a more seasonal and short-term character that influenced relations with the community of origin. Permanent emigration, often characteristic of the Jewish population, usually severed or weakened contacts entirely. In contrast, temporary emigrants maintained strong ties with their home communities through remittances, cultural connections, and visits. This topic is one of the main themes that William Thomas and Florian Znaniecki explore in their classic five-volume work *The Polish Peasant in Europe and America*, first published between 1918 and 1920. In this work, the authors demonstrate how, through the exchange

of information, letters, and remittances, emigrants shaped both the places they left and the places where they settled.

As the twentieth century began, a significant influx of overseas emigration was observed, for the first time in European history, migration to America became a mass phenomenon. Similar processes affected Jews from Central and Eastern Europe, with many of them leaving Galicia and the western part of the Russian Empire due to persecution, poverty, and lack of prospects. Isaac Bashevis Singer, born near Warsaw in the early twentieth century, addressed these urgent concerns in his novels. The Jews settled on the eastern coast of the United States, establishing numerous, rapidly developing communities with strong, distinct cultural and social structures. Other national and ethnic groups from Central and Eastern Europe behaved similarly, creating enclaves in their new places of residence, where they maintained their own traditions, culture, and language. These groups' integration into their new environment proceeded at a slow pace (Jaroszyńska-Kirchmann 2004; Morawska 1984; Pula 1995; Szlauzys 2017). To this day, many American cities still have neighbourhoods that people traditionally refer to as Slavic villages, even though their former inhabitants left long ago.

Border changes after the two world wars

The First World War triggered the collapse of the great multinational empires of Austria-Hungary and Russia, which had previously dominated Central and Eastern Europe. The Treaty of Versailles (1919) formally ratified this disintegration and marked the symbolic beginning of a new geopolitical order across the entire continent. Within its territory, independent states emerged based on the principle of national self-determination. These states included Austria and Hungary as independent republics, Czechoslovakia, which united Czechs, Slovaks, and numerous German and Hungarian minorities in the west and south of the country, Poland, which regained independence after 123 years of partitions, the Kingdom of Serbs, Croats, and Slovenes (later Yugoslavia), and Romania, with a large Hungarian minority.

Moreover, the new territorial divisions and state borders that authorities established at the turn of 1918 and 1919 led to mass ethnic migration and resettlement. The newly established states faced the need to build relations with co-ethnics and emigrants living abroad, as well as to develop principles, tools, and institutions to maintain national identity and contact with their homeland. Many countries in the region viewed the presence of numerous and territorially concentrated minorities as an instrument of political influence in relations with their neighbours. In his article published in this issue, Miha Zobec (2025, in this section) describes the complex process of shaping the newly established state's policy towards diasporas in the interwar period, drawing on the example of Yugoslavia. Zobec analyses the diverse actions that the Yugoslav authorities took towards various diaspora groups: emigrants, trans-border co-ethnics, as well as those who decided to move and settle down in the newly formed state within the framework of the Yugoslav nation-building project.

George Curzon, the British diplomat who had never visited this part of Europe, drew widespread criticism when he established new borders at Versailles. Many considered these borders unjust, as significant national and ethnic groups found themselves outside the borders of their own countries, which fuelled political instability across the region. Under the Treaty of Trianon (1920), Hungary experienced the greatest territorial losses (70 percent of its territory) and consequently a sharp population decline in favour of its neighbouring states. A few million ethnic Hungarians suddenly lived outside the borders of the new state, primarily in Romania (mainly Transylvania), Czechoslovakia (southern Slovakia and Transcarpathia), and Yugoslavia (Vojvodina). The regional concentration of

these groups would prove significant in the future, as the issue of Hungarian minorities and their discrimination would become the source of interstate tensions and revisionist aspirations. Many still consider the decisions made in Trianon unjust and humiliating, shaping Budapest's domestic and foreign policies to this day (Egry 2020; Gyáni 2012).

The Second World War triggered even greater political, territorial, and population changes. The war culminated in the Yalta and Potsdam Conferences, during which the winners drew new borders and forced mass resettlements that affected virtually every country in the region. Forced population resettlements resulting from political decisions by foreign powers form one of the most tragic experiences of Central and Eastern Europe (Snyder 2010). Deportations and displacement continued long after the end of the war in 1945 and affected millions of Germans, Poles, Hungarians, and other national groups. Until the early 1950s, the USSR deported people from territories within the new borders of the USSR into very remote areas, including Siberia and Kazakhstan. These deportations affected Poles, Lithuanians, Latvians, Estonians, Ukrainians, Germans, and Tatars. The history of forced displacements left deep wounds in the memory of Central and Eastern European nations and continues to shape their national identities.

Poland is an example of a country that experienced significant territorial changes due to the decisions originating in Yalta. The country's border shifted westward through the USSR's annexation of eastern Poland – now part of Belarus, Ukraine, and Lithuania – and the incorporation of parts of eastern Germany into Poland as compensation for the lost lands. These border shifts induced the mass resettlement of millions of people and the emergence of numerous communities and territorially concentrated Polish minorities – accidental diasporas, using Brubaker's term – in neighbouring countries: Lithuania, Belarus, and Ukraine. Officially referred to as Poles in the East, they remain an important goal of diasporic policies pursued by successive Polish governments to this day (Nowosielski and Nowak 2017).

As Brubaker (2009) aptly notes, the emergence of accidental diasporas resulting from border changes after the First and Second World Wars represents a unique phenomenon in Central and Eastern Europe. Their significance in the histories of many countries proves crucial for understanding both the emergence of Central European diasporas and contemporary interstate relations in the region.

Experiencing communism and isolation

After the Second World War, most Central and Eastern European countries fell under the political and economic influence of the USSR. Communist regimes emerged in Poland, Czechoslovakia, Hungary, Romania, and Bulgaria. Citizens of these countries experienced communist party rule, centrally planned economies, political repressions, and ubiquitous surveillance. The term 'Iron Curtain' perfectly captured the situation in Central and Eastern Europe in the postwar period. After communist governments subordinated to Moscow seized power, authorities introduced strict regulations on travel abroad and enforced restrictive passport rules, effectively preventing emigration to Western Europe and overseas (Stola 2010).

In the following postwar decades, state authorities gradually lifted these restrictions, striving to control migration flows by initiating seasonal or contractual labour migration, often to other socialist countries and, less frequently, to Western nations such as the Federal Republic of Germany, Austria, or France, based on bilateral international agreements. Furthermore, this period witnessed waves of involuntary emigration from the region following unsuccessful anti-government social protests and associated persecutions. The Hungarian Revolution of 1956 prompted approximately 200 thousand

people to flee the country, fearing repression. Following the Warsaw Pact invasion of Czechoslovakia in 1968, tens of thousands of Czechs and Slovaks fled to the West, fearing reprisals after the suppression of the Prague Spring. Poland experienced a similar wave of emigration following the banning of the Solidarity trade union and the introduction of martial law in 1981.

Subsequent waves of emigration, resulting from political repression in the region, prompted opposition groups abroad into action. The establishment of communist regimes in the CEE countries prevented many wartime emigrants from returning to their home countries. These emigrants supported democratic governments in exile and built active anti-communist emigrant networks, primarily in Great Britain, France, and the United States. Democratic governments in exile from countries such as Poland, Czechoslovakia, Bulgaria, Romania, and Hungary formally maintained the state structures that had gone into exile at the outbreak of the Second World War. They continued their activities, mainly in London, integrating politically active emigrants from subsequent waves, who rejected communist rule in their homelands.

We could describe the diaspora policies of communist and socialist countries as twofold. Authorities treated political emigrants as traitors and enemies, subjecting emigrant communities to surveillance by the security services. Furthermore, the authorities attempted to seize control of independent diaspora organisations in Western countries, accusing them of revolutionary and anti-government activities, while marginalising the influence of governments in exile. At the same time, communist authorities supported the migration of contract workers to neighbouring countries, approaching it as part of a cooperation policy within the Eastern Bloc.

The political transformations initiated in 1989 and the collapse of the Soviet Union in 1991 emerged as turning points leading to the overthrow of communism, the fall of the Iron Curtain, and the profound political and economic transformation of the entire region. Moreover, the collapse of the Eastern Bloc and the restoration of full sovereignty to Central European countries marked the beginning of a new chapter in their relations with diasporas (King 1998). The first democratic governments needed to redefine these relations and, above all, rebuild trust after decades of hostility toward emigrant communities in Western countries. Additionally, the 1990s initiated a new phase in the region's engagement with kin-minorities, whose issues had remained frozen under communist rule. Consequently, successive governments of these countries prioritised these groups, implementing special measures for co-ethnics, such as repatriation schemes, preferential paths to citizenship or *quasi*-citizenship rights. For instance, ethnic cards in Slovakia, Hungary, Poland, and Romania confirmed membership in the national community and granted certain privileges guaranteed by the state of origin (Kovács 2017: 96–98; Waterbury 2014).

In his article, Bastian Sendhardt (2025, in this section) frames diaspora policy as an attempt to create a political community on a global scale – as global nation-building process. Sendhardt claims that diaspora engagement policies extend beyond foreign and migration policy and contends that instruments like *quasi*-citizenship (Polish diaspora policy and Pole's Card) expand national membership beyond the territorial and juridical borders of the nation-state, thereby reshaping the traditional categories such as citizenship, territory, and national belonging.

The transformation of the CEE countries towards democratic political systems and free market economies opened their borders and created new opportunities for emigration (Fassmann, Münz 1994). From the early 1990s onwards, traditional emigration routes to Western Europe and overseas reemerged after remaining closed during the Iron Curtain period. Some countries, such as Poland, the Czech Republic, Slovakia, and Hungary, implemented reforms relatively smoothly, while others, including Romania and Bulgaria, struggled with lasting political instability and economic difficulties. These differences shaped the varying pace at which these countries integrated into European structures. Ultimately, however, all the countries listed above became members of the European Union, marking another significant shared experience for the entire region and bringing considerable consequences for the development of Central European diasporas.

EU membership and post-accession diasporas

The opening of the European Union to new member states from Central and Eastern Europe symbolised the end of the division of Europe that had persisted since the end of the Second World War. The year 2004 witnessed the largest expansion in EU history, with 10 countries joining the Union, including 8 Central European countries: the Czech Republic, Estonia, Lithuania, Latvia, Poland, Slovakia, Slovenia, and Hungary. Three years later, Bulgaria and Romania followed. The EU accession granted citizens of the new member states the right to move freely within the Union, which encouraged waves of emigration to Western European countries in search of work and higher wages. The opening of labour markets in countries such as Great Britain, Ireland, and Sweden in 2004 – and, with a delay, in other EU countries as well – contributed to large-scale emigration from the region.

The accession of the CEE countries to the EU became another shared regional experience that fundamentally changed migration patterns, reducing traditional overseas routes in favour of intra-European migration. New diasporic communities emerged, which scholars describe as post-accession diasporas (Popyk, Lesińska and Dambrauskas 2023). While the scale of emigration from the new member states varied, in practice, each country experienced it to some degree. The largest number of emigrants to the ‘old’ EU countries relative to their population occurred in Romania, Lithuania, the Czech Republic, and Bulgaria (King and Okólski 2019). Emigrants from the CEE countries travelled along well-established routes to traditional destinations, such as Germany, but also settled in entirely new territories. In a short period of time, Poles became the largest national group in countries such as Iceland and Ireland, where almost no Poles had lived before Poland’s EU accession (Dziekońska 2021; Kloc-Nowak, Lesińska and Pszczółkowska 2023a).

Although post-accession emigrants remain a diverse group, several common characteristics are evident. Post-accession emigration primarily comprised young and educated individuals – secondary school and university graduates – who found their motivation in economic factors and sought opportunities for higher earnings, better living conditions, and improved educational prospects. Scholars often emphasise the transnational nature of this diaspora (Engbersen, Snel and de Boom 2012; White, Grabowska, Kaczmarczyk and Slany 2018). Post-accession emigrants maintain strong ties with their countries of origin, frequently visiting, investing, and keenly observing the situation in their home countries with the prospect of a possible return in the future. At the same time, these emigrants adapt to life in their host countries, start families there, and acquire new citizenships. Two decades after the first EU expansion that included the CEE countries, scholars can no longer describe post-accession migration as a temporary phenomenon but as a process of permanent settlement in new homelands (Kloc-Nowak, Lesińska and Pszczółkowska 2023b). Currently, post-accession diasporas exist as populations in which new generations emerge: those born in their parents’ homeland and raised abroad – the 1.5 generation – and those born abroad – the 2.0 generation.

The phenomenon of post-accession diasporas, their size, as well as their transnational and multigenerational character, poses significant challenges for countries of origin in maintaining mutual relations and building bonds. This situation demands the redefinition and intensification of existing initiatives towards diasporic communities, including the provision of consular assistance for economic emigrants and the development of infrastructure and educational programmes in the native language to engage younger generations (Popyk 2022). Furthermore, this new phenomenon requires new strategies for cooperation with the diaspora across many areas, including legal and political (Popyk and Lesińska 2023).

Conclusion

All the historical events mentioned above shaped the emigration processes and the formation of diasporas from Central and Eastern Europe, which share multiple similarities. The historical context of the region, comprising such crucial events as the collapse of multiethnic empires, shifting national borders following both world wars, the shared experience of communism and isolation, and subsequent integration into European structures, contributed to the similarities in the emigration and settlement processes among the countries of the region. All these countries act as migrant-sending states and ethnic kin-states, each with broadly dispersed emigrant diasporas resulting from two main factors: mass outflows on the one hand, and the emergence of kin-minorities (accidental diasporas) originating in border changes on the other.

Emigration from this region has always appeared diverse, with people leaving primarily for economic reasons: poverty, overpopulation, lack of prospects, and the search for 'bread and work'. Additionally, political emigration constitutes a significant part of the history of Central European diasporas. During periods of national uprisings and ethnic, political, and religious persecution, refugees (exiles) joined economic emigrants. In his description of the Polish diaspora, Adam Walaszek (2001) accurately identifies this phenomenon as the 'diaspora of victims' and the 'diaspora of labour'. Emigrants from the region followed similar routes: westward to more affluent parts of Europe, primarily Germany and France, as well as overseas, first to the United States and later to other countries in the Americas. Traditional emigration routes changed with advancing European integration, and intracontinental mobility became dominant compared to overseas travel.

Despite internal diversity, Central European diasporas share several common features. These include a centuries-old history of multinational coexistence, shifting borders, imperial traditions of the Austro-Hungarian and Russian empires, and hybrid identities connected with the phenomenon of borderlands, where various ethnic groups, cultures, and languages intertwine. These diasporas also share a legacy of intense economic and political migrations, the experience of the two world wars and subsequent forced resettlements, the isolation of communism, political transformation, and mobility at the turn of the twentieth and the twenty-first centuries.

Central and Eastern European countries pursue widely ranging policies towards emigrants and kin-minorities, both in scope and the range of actions implemented. An extensive body of literature describes these diaspora policies and offers comparative analyses (see Janská 2024; Kovács 2017; Trandafoiu 2023). What distinguishes many countries in the region is their effort to strengthen relations with kin-minorities living in neighbouring countries by adopting legal, political, and institutional solutions designed specifically to support this group.

The special section comprises four articles that address the relationship between diasporas and their states of origin in Central and Eastern Europe, across various countries, historical periods, and dimensions. As mentioned above, Miha Zobec (2025, in this section) explores the process of shaping diaspora policy in the newly established state of Yugoslavia in the interwar period and the complex process of incorporating diverse diasporic communities into the newly formed nation-state. Moreover, state actions towards the diaspora carried both national and political significance, as they aimed at overcoming internal divisions within the national community and restoring the state's political legitimacy. As also noted above, Bastian Sendhardt (2025, in this section) conceptualises diaspora engagement policies as constitutive practices of global nation-building, through which states seek to recalibrate the ideal-typical relationship between citizenship, territory, and national belonging. Using

the Polish case – particularly the Card of Pole (*Karta Polaka*) – as a heuristic device, he demonstrates how states extend selected rights and forms of membership to non-resident non-citizens, thereby projecting national belonging beyond territorial borders while simultaneously reaffirming the nation-state form. The analysis shows that the Card of Pole exemplifies how contemporary states employ diaspora engagement policies to reconfigure, rather than transcend, the structural logic of the global political order.

The subsequent article in this section concerns Hungary and the changes in its diaspora policy over the past two decades. Myra Waterbury (2025, in this section) claims that the Hungarian government incorporated diaspora policy into its broader governance, using it to maintain and legitimise the current system of control by expanding the scope of illiberal and undemocratic practices, which she names ‘illiberal transnationalism’. This argument indicates that countries like Hungary show preferential treatment or marginalise members of their diaspora, emphasising their loyalty to their state of origin rather than different types of diasporas, as was the case in the past. Hungary’s current system, which is much more closed, more ideological, and less transparent policy system, has a significant impact on the structure and content of diaspora policy.

In the closing article of this special section, Ivan Kozachenko (2025, in this section) examines the activities of a particular diaspora organisation and its agency in relations with its country of origin. The article concerns the Ukrainian World Congress (UWC), the leading organisation representing the Ukrainian global diaspora, which consistently redefines its strategies in response to successive critical moments in Ukraine’s history. The UWC supports Ukraine’s pro-European course and adjusts its level of engagement to the evolving geopolitical situation. According to Kozachenko, the organisation firmly opposed the pro-Russian authorities in Kyiv and consistently strengthened the Ukrainian state during the period of full-scale Russian aggression. Moreover, the organisation participated in developing and successfully lobbied for the adoption of the long-awaited law on multiple citizenship, paving the way for greater incorporation of diaspora representatives into Ukraine’s political life.

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Notes

1. The concept of Central and Eastern Europe appears ambiguous and conventional. The present text employs a comprehensive historical and cultural approach, emphasising shared historical experiences, borderlands, interpenetrations of cultures, and hybrid identities shaped by the influence of multiethnic empires, namely the Austro-Hungarian, Russian, and Ottoman Empires, as well as wars and displacements (see Snyder 2003, 2010). In the broadest sense, this approach encompasses Poland, the Czech Republic, Slovakia, Hungary, the Baltic states, Romania, Bulgaria, as well as the countries of the former Yugoslavia, Ukraine, and Moldova. This text focuses primarily on the first group of these countries.

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Conflict of interest statement

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The Kin-State and Sending-State Policies of Interwar Yugoslavia: The Issue of Julian March Immigrants in Their Yugoslav ‘Homeland’ and the Return of the ‘Tenth Banovina’

Miha Zobec*

This contribution analyses the ways in which interwar Yugoslavia addressed two different diasporas, one comprising the emigrants and the other encompassing the external kin of Slovenes and Croats living in the Italian region of Julian March/Venezia Giulia. In addition, it examines how, on the one hand, the emigrants who ‘returned’ and, on the other, the Julian March migrants who fled the region to settle in Yugoslavia, were integrated into the Yugoslav nation-building project. It suggests that Yugoslavia’s diaspora-building was importantly linked to overcoming internal divisions in a complex country and restoring political legitimacy. Furthermore, it argues that diaspora-building was more part of a discourse than carried out in earnest, since Yugoslavia, occupying an unfortunate position in the international system, was ill-equipped to provide emigrant care or serve the return migrants and Julian March immigrants.

Keywords: The Kingdom of Serbs, Croats and Slovenes/Yugoslavia, Yugoslav diasporas, kin-state and sending-state policies, nation- and state-building

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Introduction

Yugoslavia's successor states devised their nationhood in times of socialist and monarchic Yugoslavia. Diaspora programmes – now employed by Croatia and, to a lesser extent, Slovenia, the countries with the once highest rates of emigration in the former Yugoslav area – to a large extent reflect the trends already set in motion in the past by monarchic Yugoslavia (Ragazzi 2017). Similarly, the attitude of Slovenia towards 'its' minority in Italy reveals some long-standing patterns, conditioned by bilateral (political) relations, an international political framework and the relevance of economic exchange with Italy. This economic exchange has long been unequal: whereas Italy has been among the chief trading partners of Slovenia (Yugoslavia), Italy's commerce with the latter has only been of negligible importance. Therefore, the long legacy of today's policies and the fact that the first Yugoslavia was a comparatively weak state operating in the era of state interventionism and protectionism – orientation which is, again, now becoming increasingly popular – makes the analysis of the country's diaspora programmes in the context of its nation- and state-building projects even more relevant.

Monarchic Yugoslavia was, like other fledgling countries in Southeastern and Central Europe, a nationalising state built on the ruins of empires. The processes of post-imperial transition and the establishment of a new state entity were, in the Yugoslav case, incredibly complex. First, the newly formed state was composed of regions deriving from different contexts – Austro-Hungarian on the one hand (Croatia, Slovenia and Bosnia-Herzegovina) and Serbian (previously Ottoman) on the other. Second, the state envisaged itself as a representative of the tripartite Yugoslav nation, composed of Serb, Croat and Slovene 'tribes'. Given the different traditions of statehood and already existing nation-building projects within previous entities, fashioning a new, Yugoslav, nation was an incredibly arduous undertaking (Nielsen 2014; Wachtel 1998). Yet the nation-building endeavour did not stop at the Yugoslav borders; the project was essentially conceived as a trans-state process, creating a global community based on presumed ethnic origin (Ragazzi 2017). Consequently, both the emigrants and the Yugoslav kin minorities, 'accidental diasporas' which resulted from the border settlements following the First World War (Brubaker 2000), were to become part of a tripartite (consisting of Serb, Croat and Slovene 'tribes') Yugoslav nation. However, tying the emigrants to a community sharing a similar fate was a backbreaking enterprise since the majority of them had already relocated as Austro-Hungarian subjects (Brunnbauer 2016). Bonding with the external kin, consisting primarily of around half a million Slovenes and Croats who were subject to the Fascist Italianisation, was equally troublesome since Italy was considered far superior to the fledgling Balkan state which, during the period of post-imperial transition, faced many issues with internal cohesion. Furthermore, Yugoslavia's policies towards the kin minorities were hardly consistent and reflected the state's intricate composition. While Slovenian and Croatian parts of the kingdom were concerned with the issue, the 'dominating' Serb part was primarily interested in maintaining sound economic relations with one of Yugoslavia's foremost trading partners. With a view to engaging diasporas, Yugoslavia looked to attract mainly overseas emigrants for return migration and to welcome the migrants arriving from the territory annexed to Italy in the wake of the Great War. National considerations were, here, as was generally the case in diaspora and migration policies, coupled with economic reflections, as the emigrants were thought to possess the necessary skills for fostering Yugoslavia's industrialisation and were used for nationalising the Yugoslav labour market, hence substituting for the 'foreign' (many were actually just foreign-language-speaking persons who had been employed in the pre-World War I era) workers. Nevertheless, whilst national considerations encouraged the inclusion of immigrants of Yugoslav origin, there were also socio-economic and practical concerns, most notably the issues linked to Yugoslavia's demographic development,

economic difficulties and the problem of citizenship, all of which hindered the process. The aim of the article is therefore twofold: first, to display the ways in which monarchic Yugoslavia's authorities addressed its two 'diasporas' – one consisting of emigrants and the other of kin minorities – and to analyse how this endeavour was linked to the country's state-building. Second, by examining the placement of return migrants and the Julian March¹ immigrants in Yugoslav societies, it seeks to understand the practical outcomes of the country's diaspora programmes.

Clearly, Yugoslavia was not the first country to embark on diaspora-building. Already in the 19th century, the strategies of fashioning modern territorialised nation-states, paradoxically, also entailed plans for bonding with 'fellow countrymen' residing beyond the country's borders (Osterhammel 2014). Needless to say, the modalities of engaging diasporas shifted over time. As explained by Smith (2003), diaspora-building depended greatly on changes in the global system and the ways in which the states reacted to them. As a result, in a certain period, different countries employed similar programmes of emigrant oversight, though the extent of their outreach depended on their position in the international order. Not only have international circumstances been important but domestic concerns – the issues linked to regime transformation and its legitimacy – were of equal relevance when fashioning these nation-building programmes (Smith 2003; Waterbury 2010a). In addition, by connecting with their 'homelands', diaspora communities have often played a significant role in (re)configuring diaspora programmes, thus implying the necessity of analysing transnational entanglements (Manz 2014). While recognising the relevance of emigrants' transnational engagement for understanding Yugoslavia's diaspora-building – the sheer establishment of the country was vitally linked to diaspora activism – my case-study puts the analysis of the state mechanisms of diaspora construction at the forefront. It does this by looking at Yugoslavia's engagement with the two diasporas, the external kin on the one hand and the 'tenth *banovina*' on the other. Arguably, while policies advanced towards these 2 distinct sets of people differed, the underlying premises for extraterritorial outreach were based on similar foundations such as capitalising on diasporas' resources and on affirming political legitimacy via diaspora engagement. Therefore, the contribution, following Myra Waterbury, attempts to explain the rationale behind Yugoslavia's programmes targeting the members of the national community residing outside the state borders and to examine the contingent events which redefined it (Waterbury 2010b). In addition, by shedding light on the placement of 'returnees' and Julian March immigrants in Yugoslav societies, it also aims to analyse the ways in which these nation-building programmes resonated when confronted with the day-to-day challenges faced by the 'national' newcomers to the country. The idea of emigrant return – as well as presenting Yugoslavia as a safe haven for the Julian March *émigrés* – were critical to Yugoslavia's diaspora policies. Moreover, while the emigrant 'return' differed from immigration in the state's ideological premises, it can be paralleled analytically, since both movements imply immigration to the country (Žmegač 2010). Even though the immigrants' integration into the Yugoslav fabric does not form part of the country's transborder outreach, it provides a test of Yugoslav nation- and state-building projects.

The contribution rests on the analysis of archival material related to the development of Yugoslavia's migration apparatus and infrastructure targeting emigrants and kin minorities. In presenting the bureaucratic structure dealing with migration, the article mostly relies on material from the Emigration Commissariat (EC) – the main organisation and information organ coordinating migration movements – as well as on the archival collection related to Artur Benko-Grado, Yugoslavia's foremost migration expert. In analysing the country's diaspora engagement, the material from the EC is supplemented by that related to the country's diplomatic infrastructure. The projects concerning the return migrants' and Julian March immigrants' colonisation are elucidated by looking into the emigrants' conference

proceedings and the material of the Italian diplomatic corps in Yugoslavia. Relying on its vast network of espionage, Italy was able to gather significant intelligence concerning the Julian March immigrants in Yugoslavia, thus providing data on Yugoslavia's relation with the region in question. The archival material is thus critically discussed, as it is through the lens of the most recent literature which, however, does not address several aspects brought forth in the contribution.

Yugoslavia's extraterritorial engagement has attracted a number of studies, the most often related to the analysis of the country's emigration policies (Đikanović 2012; Miletić 2012) or to exploring the link between Yugoslavia's emigration and nation-building projects (Brunnbauer 2016). The study of Yugoslav diasporas has been equally fruitful. Unsurprisingly, most of the scholarship has addressed Yugoslav emigration in its most numerous settlements – therefore mostly in North America (Đikanović 2016; Larson 2020) and slightly less in South America (Molek 2016; Puh and Silva 2017, 2018; Zobec 2023).² The Julian March emigration has also been analysed, most notably by works highlighting its political ramifications (Kalc 1996) and insertion in the Yugoslav socio-political framework (Wörsdörfer 2004; Zobec 2022).

Thus far, little effort has been invested in bringing together these two separate bodies of knowledge, one analysing Yugoslav diasporas and diaspora policies and the other shedding light on the country's stance towards the external kin. Likewise, the relevance of Yugoslavia's diaspora-building for overcoming internal divisions and restoring political legitimacy has thus far not been highlighted. In short, the relevance of the country's extraterritorial engagement for understanding its history has been neglected. By analysing both the ideological underpinnings and practical outcomes of both sets of Yugoslavia's extraterritorial policies, we hope to gain a more comprehensive and nuanced image of Yugoslavia's past. Since diaspora politics are dependent both on domestic concerns and on international relations, examining them helps to better understand both the (domestic) issues which burdened the country as well as its international positioning. Moreover, even though the case-study refers to the interwar Yugoslavia, its findings have broader implications – first, as a consequence of long-lasting legacies of diaspora policies set forth at that time. Second, even though, at first, Yugoslavia did not forcefully engage in diaspora politics like some other countries did at that time (for instance Italy, Hungary or Poland), Yugoslavia's 'case' is equally instructive for comprehending the meanings and strategies of states' extraterritorial oversight. Not least because examining countries that failed in their diasporic endeavours is equally as relevant as exploring those which succeeded (Østergaard-Nielsen 2003).

The article first provides an outline of Yugoslavia's diaspora and kin-state policies. By shedding light on convergences and divergences in engaging 2 diasporas, it endeavours to understand the role of diaspora engagement in the country's nation-building. It then displays the issue of return and immigration to Yugoslavia and thus presents the ways in which migration policies unfolded in practice. Finally, by comparing the conceptual underpinnings and practical developments, it situates the country's extraterritorial outreach in a comparative framework.

The development of Yugoslavia's diaspora and kin-state policies

The strategies of envisioning a de-territorialised entity consisting of Yugoslavs abroad set the Yugoslav attitudes towards diasporas and kin minorities on an equal footing. Yet the policies which the country's authorities advanced towards these 2 different sub-sets of 'Yugoslavs abroad' differed in practice. This section first illustrates the development of Yugoslavia's diaspora policies targeting the emigrants. Second, it looks at the ways in which the state authorities engaged the kin minorities in Italy. Finally, it

sets Yugoslavia's diaspora and kin-state policies in a comparative framework, in a bid to display the underlying purposes of both sets of policies.

The development of Yugoslavia's migration and diaspora policies was vitally linked to changes in the international socio-economic framework following the First World War. As *laissez-faire* capitalism gradually gave way to state-imposed protectionism and control over the economy, the states began to act as nationalising entities, defining themselves as proprietors of titular nations (Foucault 2008; Le Bras 2003; Zahra 2016). Naturally, the shift was not as schematic, as many attributes outlived imperial dissolution. Yet the tumultuous transition ended with the imposition of King Aleksandar's dictatorship in 1929 and the outbreak of the economic crisis. However, drawing on the experiences of and casualties suffered during the First World War as well as on the importance of the country's establishment, the fledgling Yugoslav state carefully monitored and managed population flows from its inception. The mission was to regulate the streams in order to render them economically and nationally 'beneficial' for the state. Consequently, the migrant was, in Yugoslavia like elsewhere during the period, transformed into the 'human capital of the nation'; this meant that their individual interests were disregarded for the supposed advantage of the state (International Labour Office 1921: 89).

Maintaining the loyalty of emigrant Yugoslavs was one of the cornerstones of Yugoslavia's diaspora policies from the country's inception, especially as diasporas in North and South America, as powerful lobby groups, vitally contributed to the establishment of the state during the First World War, in both financial and diplomatic terms. Yet the plans to transform the predominantly Croat and Slovene emigrants – who had relocated before the country's establishment – into dedicated subjects, were slow to materialise. The country was simply too burdened by pressing issues of border settlement, agrarian reform, political instability and financial stabilisation for the authorities to direct their attention towards the diasporas. Nevertheless, soon after the country's establishment, experts working at the Ministry of Social Policy, who were responsible for migration issues, considered that the kingdom had both economic and national interests *vis-à-vis* the great mass of emigrants residing mainly in the US (totalling around 600,000 individuals, of whom around 300,000 were of Croat origin, 250,000 of Slovene origin and 50,000 of Serb origin). In fact, these objectives were complementary, as loyalty to Yugoslavia was needed if the emigrants were to contribute financially to the 'homeland' (Arhiv Jugoslavije, n.d.). Their financial support was considered by policy-makers and migration experts to be critical given that Yugoslavia was in desperate need of capital to facilitate industrial development. In this vein, one of the foremost migration experts of the time, Artur Benko-Grado, suggested that the state authorities could wisely use the workforce in the US by transforming them into temporary migrants, so that they would commute back and forth and thus provide the know-how for Yugoslavia's much-needed industrialisation (Benko-Grado 1924). However, with the imposition of the quota system in the US in 1921 and, especially, with further restrictions in 1924, the realisation of Benko-Grado's programme became unlikely. The proclivity of the US to restrict the outflow of the workforce and to Americanise those already residing there, encouraged the Yugoslav policy-makers to solidify diaspora programmes and to redirect the objectives of the state's *attachés* and diplomatic corps. No longer responsible for technical and organisational issues, their core assignment consisted of 'national-cultural propaganda' (Arhiv Jugoslavije 1928). Furthermore, the Serb, Croat and Slovene emigrants were, through the law based on *ius sanguinis*, to be transformed into Yugoslavs. In other words, the Citizenship Law passed in 1928 not only facilitated the acquisition of citizenship for people of 'Serbo-Croat-Slovene' origin born abroad but also stipulated the perpetuation of membership of those born on what is now Yugoslav soil but who were residing elsewhere – unless they renounced it (Uradni list [The Official Gazette], 19 November 1928). The *ius sanguinis* principle engendered a host of problems for emigrants visiting

Yugoslavia, especially regarding the mandatory military service for men, thus further provoking the estrangement of the emigrant population. Throughout the 1920s, links with the homeland were poorly established and the issue of the Yugoslav diaspora barely resonated in the Yugoslav public view.

Yugoslavia's development was, throughout the 1920s, encumbered by crises linked to organising common statehood and provoked mainly by the unsolved 'Croat question' – which basically included not just Croats but other parts of the former Habsburg Empire, such as Serbs, outside the former kingdom. Turmoil was the most acute in 1924–1925 and in 1928 when the Croat politician with the highest backing – Stjepan Radić – was first imprisoned and then ultimately murdered in parliament. Even the possibility of the country's decomposition surfaced at that time (Axboe Nielsen 2014). To combat disruptive forces, King Aleksandar institutionalised a dictatorship. Fostering more comprehensive diaspora programmes fit well into his endeavour to fashion national unity through administrative reorganisation (the creation of new units or '*banovinas*' bearing the names of rivers), the enhancement of surveillance apparatus and the concept of integral Yugoslavism (from then on the 'tribal identities' of Serbs, Croats and Slovenes were to be revoked in favour of an indivisible Yugoslav identity). By invoking our 'tenth *banovina*' (the emigrants allegedly had complemented 9 administrative units on the Yugoslav territory), Aleksandar Karađorđević could hope to restore the government's shattered legitimacy (cf. Waterbury 2010a). Not least because the emigrant bulk consisted of 'riotous' Croats – in addition to the more withdrawn Slovenes. Attempts to attract emigrants in Yugoslav nation-building efforts were now greatly enhanced. A special section – the Department for National Propaganda Work – was institutionalised at the EC in Zagreb, the main institution for coordinating emigration affairs. Radio programmes and propaganda periodicals were set to promote the emigrants' emotional attachment and an Emigration Museum showcasing the breadth and achievements of Yugoslav emigrants was established in Zagreb (Brunnbauer 2016; Larson 2020). In addition, the emigrants were encouraged to visit Yugoslavia and participate in emigrant meetings – so-called Emigrant Congresses and Emigrant Sundays (*Iseljenička nedjelja* became an annual event, taking place on the first Sunday in Advent) organised to bond the emigrants with the Yugoslavs at 'home' and thus foster a sense of borderless Yugoslav identity. The cooperation of the private initiative, organisations of emigrant returnees in Yugoslavia, united in SORIS (abbr. *Savez organizacija iseljenika* = Union of emigrant organisations) was crucial in this endeavour (Đikanović 2016; Kalc and Zobec 2021). These societies functioned – as was generally true for Yugoslav civil society in the interwar period and especially in the 1930s – as an 'additional tool for the Yugoslav state- and nation-building project' (Giomi and Petrungaro 2019: 7). It is therefore hardly surprising that the president of SORIS, Milan Marjanović was, at the same time, chairman of the Central Press Bureau (*Centralni presbiro*), the main institution overseeing the country's press.

In short, the Yugoslav policy-makers devised programmes targeting the emigrants primarily because they considered them to be a financial asset but also because, by engaging diasporas, they justified the idea of a global Yugoslav nation transcending state boundaries. Whereas the emigrants residing overseas seemed financially promising for Yugoslavia, the state could not expect a similar material gain from external kin in Italy. Yet, the authorities considered migrants fleeing the territory to settle in Yugoslavia as a useful vehicle for nationalising the labour market, so they also nationally underpinned any economic interests related to these groups. In addition, Slovenes and Croats living in Italy were relevant for Yugoslavia, not simply because the state authorities could, at least potentially, play with the idea of retrieving from Italy the territory that a significant share of Yugoslav politicians and public alike considered Yugoslav by virtue of its ethnic composition. Yet, while this idea of the 'unredeemed' or 'enslaved brothers' in Italy reverberated in the Slovenian part of the kingdom and, to a lesser extent, in

Croatia, it was all but irrelevant to others, especially to the ruling Serb elite, geopolitically oriented towards the Danubian basin and the Balkans (Čermelj 1955; Tchoukarine 2011). Furthermore, as the country was officially a *status quo* rather than an irredentist state (Čermelj 1965; Mylonas 2012), the statements regarding border revision were only raised in secret and were claimed publicly only at mass rallies in support of minorities in the Italian annexed region during the authoritarian turn in the early 1930s. In addition, Yugoslav prudence in engaging kin minorities was further posited by the fact that Italy was Yugoslavia's 'superior neighbour' (both in terms of economic development and of the position it occupied in the international framework) which had no specific obligations regarding the minorities on its territory. Since 1922, the country had been run by the fascist regime that considered territorial aggrandisement – also at the cost of Yugoslavia – and treated ethnic minorities as foreign elements on Italian soil (the official term was '*allogeni*' – allogenic – 'native but foreign'), seeking thus to Italianise them (Di Michele 2023; Pergher 2012; Sala 2000). Those living in the borderlands (as Slovenes and Croats in Julian March and Germans in South Tyrol) were regarded as especially problematic, given that the state's authorities considered they could function as a 'fifth column' of their 'homeland' in case war broke out (Brubaker 1996: 5). Therefore, while Italy worked on nationalising its territory and Italianising its minorities, Yugoslavia's potential engagement on behalf of its external kin was obstructed. It was additionally hampered by the fact that Yugoslavia itself had a record of mistreatment of minorities on its territory (petitions regarding the abuse of minorities' rights flooded the League of Nations – see Cowan 2003). Therefore, raising awareness about the discrimination of Slovenes and Croats in Italy was problematic for Yugoslavia. Activism on behalf of kin minorities was further hindered by the fact that Italy was one of Yugoslavia's primary trading partners. Whereas Yugoslavia depended on exports to its Western neighbour, the Italian economy was fine without Yugoslavia – while as much as one quarter of Yugoslav exports were directed to Italy, barely one tenth of the country's import was coming from there (Belin 1930). Therefore, given the financial benefits of Italian trade and power in the international political framework, Yugoslavia's authorities adjusted its engagement of kin minorities in accordance with its relations with Italy. Consequently, as the idea of territorial loss did not resonate evenly across Yugoslavia, the country's authorities could justify economic arguments – hence the benefit of exchanges with Italy – without losing too much popular appeal by neglecting external kin.

Specificities aside, a number of parallels could be observed in policies geared towards diasporas on the one hand and those engaging kin minorities on the other. Like diasporic engagement, that on behalf of external kin was also rudimentary in the 1920s and rose to prominence in the 1930s. In the 1920s it did not entail state-wide coordinated activities and was confined to specific organisations particularly suited for engaging those in a nearby country. One of these organisations was the Office for Occupied Territory (*Pisarna za zasedeno ozemlje*), headquartered in Ljubljana and which, in the years following the Great War, collected intelligence regarding the demeanour of the Italian authorities towards Slovenes and Croats in and around Trieste and Gorizia. Spying on the territory that was with the Rapallo Treaty which was officially annexed to Italy in 1920 was continued by other organisations with similar aims and was accompanied by the activism of the paramilitary units of Orjuna (Organisation of Yugoslav Nationalists = *Organizacija jugoslavanskih nacionalista*) (Zobec 2022). The latter operated clandestinely on the adjudicated territory, supporting the anti-regime groups which sprang up as the Italian authorities pushed hard for national homogenisation after the introduction of the Yugoslav dictatorship in 1926 (Kacin-Wohinz and Verginella 2008). All these organisations had clear irredentist aims which were, however, not officially backed by the country's authorities. With the introduction of King Aleksandar's dictatorship, previously sporadic activities, scattered among various organisations, became part of a centrally coordinated programme, indirectly championed by the royal government.

Following the homogenising and nationalising principles institutionalised by the introduction of the Fascist dictatorship, the Italian authorities cracked down on the Slovene and Croat anti-fascist movements on sham trials in 1929 and 1930. In response, Aleksandar considered fuelling homeland nationalism and presenting the fate of the Julian March minorities to be intrinsically linked to Yugoslavia (cf. Brubaker 2000). By organising rallies which included organisations with the largest backing across Yugoslavia (such as the National Defence – *Narodna odbrana*, association of war veterans tied to the court; *Sokols*, the state-wide gymnastic association ingrained with Yugoslav nationalism; and the Adriatic Guard – *Jadranska straža* – association which strove to present Yugoslavs as a maritime nation, tied to the Adriatic sea), Aleksandar also hoped to exert pressure on Italy and thus present Yugoslavia as a force to be reckoned with in international relations. This strategy was made possible thanks to the activism of Julian March immigrants (as explained in the next section, they were flowing to Yugoslavia throughout the interwar period), directed by the *émigré* politician, lawyer Ivan Marija Čok. Čok left Julian March in 1928 and was Aleksandar's personal acquaintance – he familiarised himself with the Belgrade elite during the Paris Peace Conference where he functioned as an expert on ethnic issues (Bucarelli 2006; Rejec 1998). Many immigrants from the territory were philo-Yugoslav,³ so the regime wisely sought to 'use' them in order to stir up internal unity. As a result they were settled in areas considered to be nationally sensitive, for instance on the borders with Austria where they replaced previous, mostly German-speaking officials; the centre of their associational activities was in Zagreb, as the regime hoped it could thus redirect Croat resentment against the Serb ruling elite into protests against Italy (*Archivio Storico Diplomatico Degli Affari Esteri* 1931). Yet, orchestrated engagement for the kin minorities was but a short-lived endeavour which was eclipsed as the European powers reframed their foreign policies in the wake of the ascent of Nazi Germany and the Italian imperial expansion in Ethiopia. As a result, Yugoslavia lost its traditional ally in France and began reorienting its foreign policies towards Italy and Germany. With the Treaty of Friendship, signed by the Italian and Yugoslav foreign ministers in 1937, the external kin finally disappeared from the agenda of the Yugoslav authorities. The Treaty did not contain special provisions for minority protection – the Italian foreign minister just promised that the state would solve the issue by treating it as a question of 'internal affairs' (Kalc 1996). Despite the mobilisation efforts carried out during King Aleksandar's rule, the engagement did not entail providing tangible benefits to Yugoslavs in Italy. Following Alan Gamlen (2008), it could be thus claimed that, when targeting the kin minorities, policies advanced by the Yugoslav authorities entailed only diaspora-building mechanisms (hence, defining the boundaries of the nation as stretching beyond state borders, thus sensitising the home public about the issue) and not diaspora integration mechanisms (providing those residing abroad with citizenship or some comparable document setting diaspora members on a par with those living in the homeland). Therefore, offering them citizenship was not an option – anything similar to it could provoke an undesired (diplomatic) scandal with Italy – and the issue of citizenship, as explained in the next section, was one of the most pressing problems the Julian Marchers faced upon settling in Yugoslavia. While the government facilitated immigrants' obtention of Yugoslav citizenship (although the procedure, as explained later, was not so straightforward), it also sought to encourage the external kin to stay in Italy and retain Italian citizenship so that, if the borders should ever be reframed, Yugoslavia could have some reasonable claim on the territory. The fact that the Yugoslav services could not deploy diaspora integration mechanisms when targeting kin minorities made these sets of policies different from those advanced to diaspora members across the ocean who were considered to be Yugoslav citizens.

All Yugoslavia's programmes of extraterritorial outreach adapted to external factors, such as structural transformations of the global economy (mechanisms targeting overseas diasporas adjusted

to the cessation of overseas emigration) and changes in the system of international relations (geopolitical reframing with the rise of Nazism) as well as to shifts in internal structures of power (the imposition of King Aleksandar's dictatorship). Both the overseas diasporas and the kin minorities were increasingly engaged during Aleksandar's authoritarian rule, presumably as a result of the strategy to foster national homogenisation (showcasing the breadth of the nation extending beyond borders pointed to national unity and power) and thus alleviate the effect of potentially disruptive internal disparities. To obtain a glimpse of the inequalities present in Yugoslavia, it suffices to look just at the illiteracy levels – while, in Macedonia, these reached 88 per cent of the population, in Slovenia only 8 per cent were illiterate (Kosier 1930). Furthermore, as the authorities promoted certain visions of diasporas and groups loyal to the regime while forcefully suppressing others, the goal was also to prevent alternative political forces – offering different visions of Yugoslav identity and polity organisation – from emerging. Moreover, by referring to the Yugoslavs abroad, King Aleksandar also sought to present the country as an entity which could, as a 'global nation', wield power in international relations. However, Yugoslavia's sway in this sphere was actually very limited, as the country occupied an inferior position in the international system and with an ineffective, predominantly agrarian economy – the ratio between agricultural resources and population was, in Yugoslavia, the worst in Southeastern Europe – could not hope for improvement (Tomašević 1955). As a result, even though the country, like other fledgling states in East Central Europe, conceived of nation-building in ethnonational terms and devised diaspora programmes accordingly, its power to put ideas into practice was limited. Despite the divergence in application of diaspora mechanisms (only diaspora-building mechanisms employed in the case of the external kin and both diaspora-building and integration for overseas diasporas), treating these separate sets of policies jointly reveals the underlying purposes that were common to the country's extraterritorial endeavour. While essentially targeting Yugoslavs residing abroad, the primary rationale, as outlined, was primarily linked to the country's internal dynamics. Namely, they formed part of the strategy to forge internal unity in a highly unstable country, marked by significant disequilibria and resistance to the centralised government. To combat resistance and engender national unity, the government, as explained in the following section, also maintained control over immigration and return migration to the country.

Return migration to Yugoslavia and its role in nation-building

Luring the emigrants to 'return' had long been one of the pillars of Yugoslavia's diaspora policies. Needless to say, only 'national' migrants were welcome and the policy of promoting return depended a great deal on the country's economic situation.

During the era of *lassiez-faire* capitalism, migrants were travelling between Europe and America unobstructed. Many of those who went to the US looked to pursue their goals at home, alleviate debt burdens and ameliorate households. These movements were brought to a halt by the First World War. The Habsburg consuls, being familiar with the transatlantic mobilities of their subjects, at that time anticipated massive re-migration in the immediate post-war period. As a cause of return, they cited not only the cessation of mobilities resulting from belligerency. Among the more relevant factors which they enumerated were the expected economic crisis in the US (resulting from the transition from a military economy) along with the detrimental labour conditions, especially concerning workers from Eastern and Southern Europe who were seen as 'undesirable aliens' subject to xenophobic sentiments, as advanced by labour organisations (Haus-, Hof- and Staatsarchiv 1917)

Mass-scale return migration indeed occurred, taking place in the immediate post-war years when as many as 37,611 migrants (according to the estimates of the EC) were welcomed by the newly established Yugoslavia (Karanović 1978). However, the fledgling South Slavic state was ill-prepared to host so many migrants. As a result, many returnees became utterly disillusioned with the newly founded country and opted to return to America. However, their discontent was not provoked only by Yugoslavia's incapacities; it also resulted from the hardships which they endured on the way to the 'homeland'. In addition to the necessity of disembarking in France and travelling on the continent all the way to Yugoslavia, many emigrants often fell prey to swindlers taking advantage of fluctuating currencies in the post-war era. Some of these were allegedly commissioned by Italy, Yugoslavia's imperious neighbour, interested in dominating the weaker state (Arhiv Jugoslavije 1920).

This troubled return to the country provided a major impetus for Yugoslavia to construct comprehensive migration apparatus. Despite the initial failures in organising return, emigrant re-migration was considered pivotal both for Yugoslavia's economic development and for its nation-building, especially in the context of forging economic autarky – which became particularly viable in the 1930s. It was thought that returnees would help to industrialise the country, which was desperately short of capital but rich in natural resources. By taking part in colonisation programmes, returnees would also improve land cultivation and 'nationalise' the areas which ethnic minorities forcibly abandoned (Aranicki 1931). Not surprisingly, the areas with highest rates of ethnic minorities – such as Vojvodina, Macedonia, Kosovo and Metohia – were to be primarily targeted by colonisation (Tomasevich 1955). The experts committed to improving Yugoslavia's socio-economic standing, together with the country's authorities therefore proposed channelling emigrant capital into colonisation programmes and re-migrant participation in them as a means of managing resources and population on the territory. The issue of colonisation was, along with the agrarian reform, present already with the advent of the new state, but it became increasingly pressing with the expansion of governmental control over the economy and accompanying tendency to re-direct the exit into internal migration in the later 1920s and early 1930s (Aranicki 1930; Benko-Grado 1927; Kosier 1926). However, the programme never really yielded much fruit. Frankly, the whole effort was based on misconceived premises. Yugoslavia was a country experiencing rapid demographic growth: in the 20 years of its existence, the population expanded from 12 to almost 16 million. With its high density of agrarian population, low productivity (the yield per hectare was among the lowest in Europe) and shortage of capital, there were very few prospects for return migrants to the countryside (Tomašević 1955). Consequently, poorly planned colonisation projects were barely able to attract emigrants. In fact, out of 9 administrative units, only 1 (*Sava banovina* which mainly entailed inland Croatia) established a special fund for colonisation (Tajništvo SORIS 1933).

Nonetheless, in its endeavour to welcome migrants affected by the onset of the Great Depression in the US, the migration service explicitly highlighted its willingness to provide assistance in terms of organising repatriation to and facilitating integration into the Yugoslav labour market (Aranicki 1931). Even though these efforts faded with the onset of the economic crisis in Yugoslavia (the country was hit with a delay) when Yugoslav migrant activists encouraged the adoption of reception countries' citizenship, the Yugoslav authorities continued to consider repatriation and colonisation (Bartulica 1933). The idea of substituting foreign workforce with 'national' returnees lay at the core of this project. Yet the methods of achieving this goal were not explained. Given that unemployment was high in the industrial sector, settlement on land was proposed as a solution, although without a plan for carrying it out, other than following the colonisation programme adopted in *Sava banovina* (Bartulica 1933). With the worsening of the economic crisis that the Yugoslav authorities were unable to address, return to

Yugoslavia hardly remained an option and was only seldom considered at emigrant congresses (I. Slovenski izseljenski kongres 1936; Lazarević 1995). Yugoslavia could therefore offer hardly any help to emigrants wanting to return they could count neither on employment in the Yugoslav industry nor on earning a living from agriculture. In addition, many of these emigrants were elderly people and, as such, were hardly employable even in normal circumstances. Many returnees were thus 'superfluous' to Yugoslavia's socio-economic requirements. Lofty plans and promises advanced by the Yugoslav migration service thus barely conformed to the reality on the ground.

A stark contrast between programmatic ideals and the bleak reality can be observed when assessing returnees' individual trajectories. While the Yugoslav authorities lauded the emigrants' struggle abroad for the 'national cause', they were reluctant to provide them with much-needed socio-economic support upon return. The story of Pavle Mrazovac, who was a functionary and an activist in several Serbian organisations in America and a plant manager in an automobile factory in Detroit, is a case in point. Convinced that the age of prosperity would be eternal, he had no savings when he was laid off at the age of 54. As a result, upon returning to Yugoslavia he turned to EC, hoping that the institution could help him to escape poverty. Yet his request, despite being embellished by the attachments confirming Mrazovac's merits (and even recommendation by the EC), was turned down on the grounds that any pension awarded would burden the Emigration Fund (a special fund in which emigrants were obliged to invest when leaving the country), especially because it would cause a domino effect, provoking the authorities to also provide pensions to other applicants. Supposedly, there were hundreds of cases like Mrazovac's – and none had been provided with a pension thus far. To amend his utterly precarious situation – Mrazovac lived with his wife in a small, dark room in Zagreb – SORIS proposed moving him into the home of elderly emigrants on the island of Hvar (Hrvatski državni arhiv 1937).

Mrazovac's is but one in a myriad of cases of return migrants who entered interwar Yugoslavia. According to SORIS' report at Emigration Sunday in 1932, there were more than 100,000 returnees trying to make a living in their 'homeland' (Tajništvo SORIS 1933). Their trajectories are, however, difficult to examine, given that the material related to the local authorities is patchy. Yet what we *can* discern from the functioning of the state system is that the returnees continued to be monitored well after their arrival on Yugoslav territory. While these practices became regularised and standardised with the expansion of policing in the 1930s, they were already applied in the 1920s. However, in the post-war period, it seems that the police apparatus observed only the presumed enemies of the state, hence communists in the first place (in Yugoslavia, the communist party was already banned in 1921) (Hrvatski državni arhiv 1923). In the 1930s, beginning with the increased surveillance during King Aleksandar's dictatorship, all persons returning to Yugoslavia were to be interrogated by the authorities at their places of residence. They had to disclose their emigrant trajectories, present their voyages, explain how long they were absent and whether they participated in any associations – and if these societies (and persons with whom they socialised) had anti-state objectives (Hrvatski državni arhiv 1931).

The act of monitoring returnees was in line with the surveillance employed by the dictatorial regime. These techniques and procedures were adopted in order to successfully instil Yugoslav identity from above and thus render national unity. Following the strategy 'He who is not with us, is against us', control was needed to permeate society and ordinary men and women were encouraged to denounce anyone who drifted away from the adopted line of unitary Yugoslavism (Axboe Nielsen 2009). Pervasive surveillance was, of course, concomitant to the expansion of Yugoslavia's bureaucratic apparatus, especially that targeting migrants and diasporas.

In a country facing severe economic difficulties, return migrants could barely obtain a reasonable job or live on agriculture, despite the noble promises which the state authorities advanced. In addition, their stay abroad sufficed for keeping them under surveillance. Therefore, the contradictions in Yugoslavia's migration and diaspora policies and the fact that the state fashioned profuse propaganda programmes but was not able to provide tangible assistance either to emigrants or to returnees, accounts for the feebleness of Yugoslavia's bureaucratic apparatus. It also shows how important both fostering consent and creating a feeling of national unity were in building a 'tenth *banovina*' and luring the emigrants to settle in Yugoslavia. The role of diasporas seems to have been critical in this regard since the emigrants, to a large degree, derived from the parts of the country where discontent was the highest. Despite the gradual transition to parliamentarism, the propaganda apparatus geared at fashioning the 'tenth *banovina*' remained in place, except that the Croat 'part' of the kingdom began to devise its own independent services following the Cvetković–Maček agreement establishing autonomous Croat *banovina* in 1939. Furthermore, notwithstanding the cessation of dictatorship, the return migrants continued to be closely observed.

Interwar Yugoslavia and the issue of Julian March immigrants

Following the First World War, Italy initially occupied and then, with the treaty of Rapallo in November 1920, annexed a greater part of the former Austrian Littoral (*Österreichisches Küstenland*). As a result of the economic downturn of the region and the policies of Italianisation, especially apparent with the entrenchment of the Fascist dictatorship, Slovenes and Croats massively abandoned the territory. Scholars consider that around 100,000 South Slavs left the region at that time, of whom 70,000 emigrated to Yugoslavia, 30,000 relocated to South America and around 5,000 to France and Belgium (Kalc 1996; Purini 1998).

The emigrants fled the territory in distinct waves. The first to depart were state employees, laid off by the Italian authorities. The emigrants arriving in Yugoslavia in the immediate post-war period were, by the end of the 1920s, already integrated into the homeland society; many substituted for previous, mainly German-speaking officials and they, instead, shared an emotional attachment to the region and the people left behind than those they politically mobilised. On the other hand, new immigrants, fleeing from economic despair (the regime imposed harsher taxes on the non-Italian population and dismantled their financial institutions) and Fascist discrimination that was becoming ever harsher after the introduction of the Fascist dictatorship in 1926, were arriving. These immigrants were pronouncedly politicised and fervently opposed the Italian oppression in emigration. In continuation, the Fascist policy of denationalisation outlawed the ethnic press and dissolved Slovene and Croat associations. Moreover, the persecution at the hands of the political police and the Fascist Special Tribunal (*Tribunale speciale per la difesa dello stato*), aimed at intimidating the masses by punishing any resistance, forced additional young anti-fascists and their families to seek shelter in Yugoslavia (Vovko 1978; Zobec 2022).

In general, the immigrants were not welcomed by the host society, even though they regarded Yugoslavia as their homeland. Seen by natives as those who were depriving them of jobs, they were called by natives either 'Lahi' (a derogatory word for Italians) or even fascists (Čermelj 1972). Moreover, most immigrants were in favour of a strong Yugoslavia, seen as a bulwark against Italian expansion, as opposed to Slovenes who supported autonomism or Croats who stood for federalism (Bartol 1993).

Though not numerous, a vocal emigrant minority was committed to the anti-Fascist struggle. The majority were too busy with their daily existence to be actively involved. To make ends meet or for other purposes, some emigrants cooperated with the Italian consular infrastructure. In addition, there were

emigrants who were simply indifferent to the discrimination against Julian March minorities (Anon. 1932: 6). The issue of citizenship obstructed immigrants' integration into Yugoslav society. The fact that they were Italian citizens reduced the possibilities of their getting employed in the public sector or applying for welfare programmes. While the process of obtaining Yugoslav citizenship should have been relatively straightforward according to the legislation (the Citizenship Law, passed in 1928 facilitated its acquisition to persons of Serb-Croat-Slovene descent), taxes had to be paid for the procedure. Becoming fully fledged Yugoslavs was, therefore, a financial burden which many emigrants, in times of economic crisis, could not afford. Nevertheless, affiliating with emigrant associations could ease their inclusion into Yugoslav societies given that the entrepreneurial emigrants devised a closed-shop system offering jobs to the associations' members. This system was tied to the Yugoslav employment agencies and thus well integrated into the state structures (Wörsdörfer 2004). The mechanisms of migrants' settlement in Yugoslavia are not entirely clear but it is generally accepted that they were not completely dependent on employment opportunities. Political factors seem to have been at play as the regime deployed the most combative emigrants to Croatia so as to deflect Croat resistance against Serb hegemony in opposition to Italy (Archivio Storico Diplomatico Degli Affari Esteri 1931).

The emigrants' troubled position in the Yugoslav nation-building project – the fact that the state authorities recognised the immigrants as an asset in the affirmation of Yugoslav identity but did not offer them tangible assistance in integrating – could best be illustrated by displaying the paradoxes of their colonisation on the Yugoslav territory. As in the case of returnees, colonisation was considered one of the primary settlement mechanisms for Julian March immigrants, many of whom were of peasant background, so their emigrant activists introduced colonisation programmes soon after the country's establishment. In turn, with the agrarian reform, these incomers filled the rural estates vacated by the Hungarian lords in the acquired territory of Prekmurje (in northeast Yugoslavia). In addition, they were assigned places in Macedonia and Kosovo, a region then known as South Serbia, where they would substitute for officially unrecognised ethnicities of Kosovo Albanians and Macedonians (Wörsdörfer 2004).

Yet, much like in the case of emigrant returnees in Yugoslavia, the colonisation programmes would only become more elaborate with the reconfiguration of the country under King Aleksandar's rule. Furthermore, the economic crisis and ensuing unemployment were decisive for the authorities, pushing them to seek additional opportunities in the countryside. Yet, despite attracting increased demand, these plans were equally poorly conceived and thus barely yielded any tangible results. The settlement envisaged by Ivan Marija Čok, the foremost *émigré* politician and an ally of King Aleksandar, in 1931 in Macedonia is a case in point to illustrate the misfortunes which occurred in colonising the Julian March migrants. To publicise the effort, Čok presented the campaign to populate the lands purchased from 'Turks' in a hotel in Ljubljana and across the emigrant as well as the Yugoslav press. Čok's mission was concomitant to the massive Serbianisation campaign of Vardar Macedonia (part of former South Serbia) undertaken by the ban of the eponymous *banovina*. Internal colonisation by members of the constitutive nation was one of the pillars of this enterprise (Archivio Storico Diplomatico Degli Affari Esteri 1934). However, the settlement of Julian March emigrants was not a particularly fortunate one and issues began to emerge as soon the colonists arrived in the Macedonian colony of Bistrenica. Endeavours to modernise agriculture were in vain, as the cooperative which managed the effort was poorly directed and the property rights were not settled. In addition, the colonists were exposed to inadequate sanitary conditions, causing malaria. Ethnic issues came to the fore as well. Despite being on a 'civilising mission', the colonists, too, fell prey to the country's homogenisation and were forced to convert from Catholicism to Orthodox Christianity (Drnovšek and Kalc 2014; Wörsdörfer 2004). This practice was rejected both

by the settlers themselves and by the most prominent emigrant organisation in Slovenia in the 1930s, the St Raphael Society, an emigrant care organisation established by the Catholic Church. As a result of the presumed menace of religious conversion and ethnic assimilation, the Slovenian St Raphael Society labelled the Slovenian emigrants in the southern parts of the country 'our inner diaspora', thus hinting at the complexities of Yugoslavia's nation-building. The Julian March immigrants were clearly not concentrated only in colonies – they inhabited towns too and were often accompanied there by immigrants from *Drava banovina* (an administrative unit corresponding to parts of current Slovenia in the Kingdom of Yugoslavia) which relocated to the southern parts of the country (Kocmur 1938). The colonisation campaign ultimately failed, leaving many colonists destitute and discontent.

Immigrant colonisation, in a nutshell, encompasses the intricacies of Julian March immigration in the Yugoslav national framework. On the one hand, the state authorities viewed the immigrants as pillars of Yugoslav identity and deployed them to the places where they would reconfigure the ethnic composition or combat separatist and autonomist tendencies. On the other hand, the same structures of power were reluctant to grant the emigrants full citizenship, stripping them of important rights and thus rendering them more vulnerable to the detrimental effects of the economic crisis. The fact that they were considered bastions of the state's unity but were, at the same time, deprived of citizenship was the most tragic in the Croatian 'part' of the kingdom, where the antagonism towards the regime was the most pronounced (Wörsdörfer 2004). Concurrently, the state authorities held a firm grip on the organised emigrant movement and coordinated its activities according to the country's internal affairs and relations with Italy. Rather than being directed outwards, towards Italy and the kin minorities living there, the objectives which the government pursued by raising awareness about the Julian March issue were oriented into managing the country's internal issues. Surely, the immigrants and the whole Julian March issue were more than suitable for fostering the country's unity and restoring the regime's legitimacy? These efforts, though similar to those pursued by contemporaneous states such as post-Trianon Hungary, were affected by Yugoslavia's singular complexity – namely its intricate composition – and the fact that Yugoslavia was a *status quo* rather than an irredentist state.

Conclusion

Yugoslavia devised its diaspora policies as a modernising state, established through the structural changes of the global socio-economic framework following the First World War. The state built a comprehensive bureaucratic apparatus, targeting both the emigrants and the kin minorities. Different sets of policies were advanced to engage these two groups: on the one hand, economic and national-political interests were at play in addressing the emigrants while, on the other, geopolitical considerations were crucial in fashioning kin-state policies.

Both sets of policies were increasingly put forward during the country's authoritarian turn in the 1930s. Certain cohesion, along with the developed bureaucratic-surveillance-propaganda apparatus, was necessary to foster comprehensive diaspora politics. In turn, these measures were employed precisely to engender feelings of even stronger national unity. Before the dictatorship, the country faced many challenges linked to post-imperial transition, coupled with the burden of the 'Croat question' and issues of political instability. Needless to say, other factors triggering a response *vis-à-vis* Yugoslav diasporas have to be considered too, such as the cessation of emigration and escalated tensions in relations with Italy. Yet despite the efforts of the authoritarian state to fashion diaspora programmes, these never reached the magnitude they had in irredentist states such as Yugoslavia's neighbours – Hungary or Italy. The fact that Yugoslavia never tied its diaspora and kin-state policies into a fully fledged

programme engaging all the Yugoslavs beyond state borders testifies to Yugoslavia's well-known inferior position in the international political and economic system. Of course, the reality of Yugoslavia being a *status quo* and not an irredentist state has to be acknowledged. However, what is striking when observing Yugoslavia is the gap between the diaspora discourse conducted by institutions and informal (yet linked to government) organisations on the one hand and the programme actually undertaken of assisting emigrants and external kin on the other.

As this contribution has attempted to demonstrate, the inability of Yugoslavia to provide diasporas with much-needed assistance can best be illustrated by looking at the return migrants and Julian March immigrants in Yugoslavia. Whereas the state authorities, allegedly building a borderless community of Yugoslavs, boasted that it offered employment and land to those wanting to embrace 'their homeland', these men and women often ended up being impoverished. Being granted Yugoslav citizenship was not as straightforward as it might have seemed; equally difficult was obtaining a stable job or acquiring a plot of land in times of economic crisis and increased population growth. Little to no economic rationale existed in luring the (destitute) emigrants to settle in Yugoslavia, which is also probably why, at the beginning of the 1930s, as the crisis affected Yugoslavia, migration activists refrained from directly attracting emigrants and proposed that the latter adopt the citizenship of the lands of reception instead. The whole endeavour for the Julian March immigrants had equally little to do with economic considerations. National-political reflections were much more relevant here as the state carefully monitored the emigrant settlements and surveilled the associations in order to fashion internal unity and foster the government's legitimacy. Yet the plan was poorly defined, as many immigrants, instead of becoming the *avant-garde* of Yugoslavism, ended up being disillusioned with the state and the emigrant associations tied to it.

However, instead of looking at the practical outcomes, in order to understand the government's rationale of extending political outreach beyond the borders, we should instead evaluate the idea of putting forth diaspora programmes. We could hypothesise that the mission of creating a borderless Yugoslav community stemmed from the need to overcome the conflicts that burdened Yugoslavia throughout the 1920s and to legitimise a regime that regarded a unified Yugoslav identity as its cornerstone. By referring to 'our tenth *banovina*' and 'the unredeemed brothers', King Aleksandar may have hoped to restore shattered legitimacy and unify the country..

Notes

1. 'Julian March' is the English translation of the Slavic designation (*Julijska krajina*) for the Venezia Giulia region, which was annexed to Italy in November 1920. It refers to the territory which included Trieste, Gorizia, Istria, parts of the Dalmatian coast and the easternmost part of the Alps (see Hametz 2005).
2. Work on South Slavic diasporas abounds; I cite here just the most recent studies.
3. Mainly as a result of Italian repression, many Slovenes and Croats from Julian March advocated for a powerful Yugoslavia and viewed political partisanship, occurring in Yugoslavia in the 1920s, as petty.

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Diaspora Engagement Policies as Global Nation-Building: The *Karta Polaka* in the Global Political Order

Bastian Sendhardt* 

This article conceptualises diaspora engagement policies as a form of global nation-building. While existing research has produced numerous typologies explaining why states engage their diasporas, it has paid limited attention to how such policies relate to the structural principles of the global political order. Addressing 3 analytical blind spots – the neglect of structural commonalities among policy types, the lack of attention to their relationship with the nation-state form and the omission of accidental diasporas – the article advances a theoretical framework that links diaspora engagement to the global principle of organising political communities. Using Poland's Karta Polaka as a heuristic device, the article demonstrates how states seek to re-establish the ideal-type congruence between citizenship, territory and national belonging beyond their territorial and citizenship boundaries. Rather than eroding sovereignty, these policies illustrate the adaptive resilience of the nation-state form under conditions of globalisation. Framing diaspora engagement as global nation-building thus reveals how nation-states continue to reproduce and legitimise themselves as central actors of world politics through transborder practices of inclusion and belonging.

Keywords: diaspora engagement, global nation-building, nation-state form, Poland, Karta Polaka, sovereignty

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Introduction

State–diaspora relations increasingly gain traction in international politics. During the past 3 decades, an ever-growing number of states worldwide maintain relations with their diaspora communities abroad and pursue specific policies of diaspora engagement. Today, we find examples of such ‘diaspora engagement policies’ (Gamlen 2006) in the majority of the United Nations member states, spanning from Albania to Zimbabwe (Gamlen, Cummings and Vaaler 2019). International organisations such as the International Organization for Migration (IOM 2021), the World Bank (Kuznetsov 2006), the European Commission for Democracy through Law, the so-called Venice Commission (Venice Commission 2001) and the International Centre for Migration Policy Development (McLean 2024) have also recognised the growing importance of state–diaspora relations and developed recommendations and guidelines for the diaspora engagement of nation-states. In other words, diaspora engagement policies have become not only an ‘increasingly normal’ (Délano and Gamlen 2014: 47) but also ‘a genuinely *global*’ phenomenon (Sendhardt 2021: 25).

Diaspora engagement policies are usually origin-state-driven efforts aiming to acknowledge diaspora communities as a fundamental element of the ‘global nation’ (Smith 2003: 726) and to formalise these transborder relations.¹ The specifics of these ‘global nation policies’ (Levitt and de la Dehesa 2003: 588) vary greatly and may include language and other educational programmes for the diaspora in their states of residence, support for media outlets in the language of the diaspora, state-run and public television as well as radio broadcasting, national holidays honouring the diaspora, the organisation of congresses, the extension of rights and privileges typically reserved for citizens (and legal long-term residents), as well as repatriation and return laws and the establishment of ‘diaspora institutions’, which are ‘formal offices of state dedicated to emigrants and their descendants’ (Gamlen 2014: 184; see also Ragazzi 2014: 75).

Specifically in the fields of political science and international relations (IR), the issue of how diaspora engagement policies intersect with core principles of the global political order has emerged as a recurring theme (Adamson and Demetriou 2007; Adamson and Han 2024; Aksel 2022; Délano 2014; Délano and Gamlen 2014; Levitt and de la Dehesa 2003, 2017; Ragazzi 2009, 2017; Sendhardt 2021). This line of inquiry focuses on the ways in which such relations ‘are re-inventing the role of states outside of territorial boundaries and in this way reconfiguring traditional understandings of sovereignty, nation and citizenship’ (Levitt and de la Dehesa 2003: 606) and, more broadly, calling into question ‘the Westphalian configuration’ of international relations (Ragazzi 2009: 380). At a more granular level, this line of research explores how state–diaspora relations in general – and diaspora engagement policies, in particular – intersect with ‘the nation-state form as a model for organising political communities’ (Sendhardt 2021: 26). Notably, international relations scholarship has underscored a tension at the heart of these policies, suggesting that they often embody a ‘paradoxical nature’ (Brand 2006: 26; Sendhardt 2021; Varadarajan 2010: 7):

On the one hand, by extending rights and privileges beyond the boundaries of territory and, at times, citizenship, these policies reflect a form of transborder nationalism that appears to be undermining basic aspects of national sovereignty and the nation-state model itself. On the other hand, however, by addressing diasporas as constitutive elements of the nation, these policies reflect a form of ‘transsovereign nationalism’ (Csergo and Goldgeier 2004: 26) which is (re-)emphasising the nation as an ‘imagined political community’ (Anderson 2006: 6), thus reaffirming the nation-state form (Sendhardt 2021: 26).

A specific instance of these developments is found in Central and Eastern Europe, where the Revolutions of 1989, the Autumn of Nations, brought about not only the fall of Communism but also a revival of national identities in the region, along with a reawakening of diaspora communities (Kruszewski 1996). A particularly instructive example is the case of Poland, as it covers the entirety of the aforementioned types of diaspora engagement policies. The Polish state engages with its diaspora, the *Polonia*, through educational programmes furthering knowledge about Polish culture as well as language proficiency, the support of Polish-language media in the diaspora's states of residence, the television channel *TVP Polonia* and the broadcasting station Radio Poland. It honours the diaspora on the National Day of the *Polonia* and Poles Abroad (*Dzień Polonii i Polaków za Granicą*) – commemorated each year on 2 May – and organises congresses in cooperation with the Association 'Polish Community' (*Stowarzyszenie 'Wspólnota Polska'*), a non-governmental organisation operating under the patronage of the Senate – the upper chamber of the Polish parliament. Furthermore, the Polish state engages with its diaspora through repatriation and kin-state policies based on the 2000 Act on Repatriation but also – and particularly – the 2007 Act on the *Karta Polaka*. It also engages through diaspora institutions such as the Department for Cooperation with the *Polonia* (*Departament Współpracy z Polonią*) which, since 24 March 2009, operates within the framework of the Polish Ministry of Foreign Affairs and whose name was changed to Department for Cooperation with Polish Community Abroad² (*Departament Współpracy z Polonią i Polakami za Granicą*) on 11 July 2012.

For the purposes of this article's central argument, the case of the *Karta Polaka* was selected over other ethnic cards in the region primarily because of 2 decisive legal amendments adopted in 2016 and 2019, which fundamentally transformed its scope and function. The 2016 reform entailed a qualitative deepening of the rights attached to the card by linking it to permanent residence, a fast track to Polish citizenship after 1 year of continuous residence in Poland on the basis of that permanent residence permit, and extensive state-supported integration measures, including financial assistance. In this way, the card was explicitly connected to the dimension of citizenship within the nation-state form. The 2019 amendment subsequently extended eligibility from Poles in the post-Soviet space to persons of Polish origin worldwide, irrespective of citizenship, thereby globalising the addressee base of the policy along the dimension of national belonging beyond territorial boundaries. It is precisely this reconfiguration of the ideal-typical nexus between citizenship, territory and national belonging that turns the *Karta Polaka* into a particularly suitable empirical case for analysing diaspora engagement as a form of global nation-building.

In the existing literature on state–diaspora relations (as will be discussed in more detail below), the predominant approach to conceptualising the wide range of policies in this field is to distinguish between different forms of diaspora engagement. More specifically, this line of scholarship tends to focus on developing typologies and taxonomies to explain why states seek to engage with their diasporic communities. While this strand of literature has been highly valuable in advancing our understanding of the goals and motivations behind state diaspora policies, it also contains certain blind spots that limit its conceptual scope.

This article addresses 3 such conceptual blind spots in particular. First, the focus on differences between the various types of diaspora engagement policies often obliterates their structural commonalities. Second, the focus on explanations as to *why* states engage with their diasporas tends to lose sight of questions about *how* diaspora engagement policies relate to central structural principles of the contemporary global political order. Third, the focus on the policies of sending states *vis-à-vis migrant* diasporas tends to obscure the specific case of *accidental* diaspora engagement policies.

In order to bring these blind spots into focus and shift the analytical orientation of the scholarly debate, this article introduces the concept of *global nation-building* as a novel framework for

understanding diaspora engagement policies. In this way, following a qualitative approach, the article seeks to make a conceptual-theoretical contribution to the political science and IR literature on state–diaspora relations in general and diaspora engagement policies in particular.

Developing the concept of global nation-building, illustrated by the empirical example of Polish diaspora engagement policies, I proceed as follows. After briefly introducing the Polish case of the *Karta Polaka* as a heuristic device, I review dominant typologies and taxonomies in the literature on state–diaspora relations. Then, to widen the conceptual field of vision, I identify and address 3 blind spots in this strand of literature. In the next section, I unfold the concept of global nation-building by revisiting and specifying core understandings of nation-building and the nation from a global perspective and by conceptualising the nation-state form as a key structural logic in organising political communities worldwide. Finally, I relate this reconceptualisation back to diaspora engagement policies, showing how they constitute a specific form of global nation-building.

The Polish case of the *Karta Polaka* as a heuristic device

In this article, I use the empirical example of Polish diaspora politics as a heuristic device to illustrate the conceptual argument about the intellectual benefits of conceiving of diaspora engagement policies as a form of global nation-building. Although this article primarily adopts a qualitative, theoretical-conceptual orientation, the case of Poland offers an opportunity to empirically anchor and substantiate the argument throughout.

In their modern guises, diasporas came into existence with the advent of nation-states.³ With only a few exceptions (see, e.g., Klekowski von Koppenfels 2019), these states have subsequently tended to develop distinct diaspora engagement policies. This holds true, too, for the case of Poland. Although early instances of diaspora policies can be traced back to the period following the restoration of Polish independence in 1918 – during the interwar period in the so-called Second Republic – the full institutionalisation and diversification of Poland’s diaspora engagement portfolio occurred only after the collapse of communist rule in 1989.⁴

In 1999, the Polish government sought to formulate a comprehensive response to the complex relationship between the Polish state and Poles abroad. To this end, it introduced a package of 3 legislative proposals. First, the reform aimed to revise the Polish Citizenship Act of 1962 – an act originating in the communist period – in order to enable the restoration of citizenship to those who had been deprived of it. Second, the Repatriation Act targeted members of the Polish diaspora in the Asian successor states of the Soviet Union, populations that had emerged as a result of forced deportations, particularly during the Second World War. Third, the Act on the *Karta Polaka* was directed at the broader Polish diaspora in the East – Poles who were citizens of one of the post-Soviet successor states and who, due to restrictive legal provisions in their countries of residence, could not legally acquire a second citizenship, in this case Polish citizenship, without forfeiting their existing one.

Of the 3 legislative proposals, only the Repatriation Act was adopted in 2000. However, due to the limited willingness and capacity of Polish municipalities to accept repatriates, its impact remained marginal (Grzymała-Kazłowska and Grzymała-Moszczyńska 2014). The revised Polish Citizenship Act eventually entered into force in 2012, modernising the legal framework of Polish citizenship and simplifying procedures for its restoration and acquisition by descent. By far the most significant impact on post-1989 Polish diaspora policy, however, was produced by the Act on the *Karta Polaka*, which therefore receives the greatest attention in the present article (for comprehensive overviews and analyses of the *Karta Polaka*, see Gońda and Lesińska 2022, 2025).

In 2007, Poland passed the Act on the *Karta Polaka*, a form of diaspora engagement policy, originally targeted solely at the *Poles in the East* – that is, members of the Polish diaspora who are citizens of one of the post-Soviet successor states, where dual citizenship was largely prohibited. The law formally confirmed its holders' 'belonging to the Polish nation' and granted entitlements such as waivers of visa fees, the right to work and establish a business in Poland, access to higher education and emergency healthcare services as well as free entrance to state museums and a reduced fare when using public transport in Poland. Following major amendments in 2016 and 2019, Polish lawmakers significantly expanded both the scope of addressees and the rights conferred by the *Karta Polaka*. On the one hand, the law now encompasses the global Polish diaspora in its entirety, irrespective of citizenship status. On the other hand, cardholders were granted practically immediate permanent residence permits, substantial state-supported integration assistance, and the possibility of applying for Polish citizenship after 1 year of continuous residence in Poland on the basis of a permanent residence permit obtained in connection with the possession of a *Karta Polaka*. Applicants under this facilitated procedure are required to demonstrate officially recognised Polish language proficiency (B1 level), while they are typically exempt from certain naturalisation requirements that apply in the general procedure, such as proving a stable and regular source of income or a legal title to occupy a dwelling. By 2023, the *Karta Polaka* had been granted to more than 215,000 persons of Polish origin, the vast majority of whom hold Ukrainian or Belarusian citizenship (Gońda and Lesińska 2025: 2).

The emergence of the *Poles in the East* is closely linked to the violent border shifts of the Second World War. Following the Soviet invasion of eastern Poland in 1939 and the post-war westward shift of Poland's borders, several million ethnic Poles found themselves outside the territory of the Polish state without having migrated. In post-1989 Poland, this historical experience gave rise to a powerful narrative of a 'moral obligation' of the Polish state towards these former compatriots and their descendants (see Jagielski and Pudzianowska 2008: 51). Early attempts to institutionalise this responsibility through a *Karta Polaka* were, however, blocked in the late 1990s, *inter alia* due to concerns that the envisaged privileges were incompatible with Poland's obligations as an EU candidate state. Ironically, it was precisely Poland's accession to the EU and the introduction of the Schengen regime that later prompted the adoption of the law in 2007, as new visa barriers separated the Polish minority in the East from their kin-state.

The *Karta Polaka* is part of a broader regional wave of so-called *ethnic cards* that emerged in Central and Eastern Europe around the turn of the 21st century (Gońda and Lesińska 2025). Beginning with the Slovak Expatriate Card in 1997 and followed by the Hungarian Status Law in 2001, several kin-states introduced legal instruments that confirm ethnic belonging and grant selected rights to co-ethnics residing abroad. These cards typically provide preferential access to the kin-state's territory, labour market, education and welfare systems, as well as facilitated paths toward permanent residence and, eventually, citizenship – what Bauböck (2007: 2396) has termed a form of 'external quasi-citizenship'. Initially designed to maintain cultural ties with kin-minorities and to provide symbolic and moral compensation for historical injustices caused by shifting borders and forced population displacements, ethnic cards have gradually been transformed into strategic tools of migration and demographic policy (Gońda und Lesińska 2025: 2). Over time, their scope has expanded from narrowly defined kin-minorities to increasingly encompass entire diaspora populations. The *Karta Polaka* followed this regional pattern closely: inspired by the Slovak and Hungarian precedents, it combines a logic of historical responsibility toward the *Poles in the East* with contemporary state interests in selective immigration and nation-building beyond territorial borders.

By incorporating the *Karta Polaka*, this article brings an example from the ‘Global East’ (Müller 2018) into the broader debate on diaspora engagement policies, which has hitherto focused predominantly on cases from the Global North and South (see Sendhardt 2021: 27). While the Global East is not a world of its own, the kin-state policies of Central and Eastern European countries constitute a distinctive variant of diaspora engagement policy. Unlike the policies of sending states aimed at emigration diasporas, kin-state laws typically target accidental diasporas (Brubaker 2000) – populations that come into existence not as a result of ‘the movement of people over borders but by the movement of borders over people’ (Brubaker 2010: 69). This description aptly captures the experience of Poles in the East, a diaspora shaped by border changes and forced deportations during the Second World War. In this sense, accidental diaspora engagement policies such as the *Karta Polaka* differ markedly from the diaspora policies of sending states, which generally address their ‘citizens abroad’ (Brand 2006; my emphasis).

What makes the *Karta Polaka* particularly noteworthy from an international relations perspective is that it extends rights and privileges to individuals who are neither citizens nor residents of Poland. In other words, the Polish state confers benefits typically reserved for its own citizens and legal residents to non-resident non-citizens, on the sole basis of their belonging to the Polish nation (Sendhardt 2017).

In the following sections of this article, I draw on Polish diaspora engagement policies in general – and the *Karta Polaka* in particular – as a heuristic device to empirically illustrate my argument that diaspora engagement policies constitute a form of global nation-building.

State of the art: How to conceive of diaspora engagement policies

In the existing literature on diaspora engagement policies, we find a dominant analytical perspective that I refer to as the *typology approach*. This approach differentiates among various forms of diaspora engagement policies, classifies them accordingly and, on this basis, develops diverse taxonomies of diaspora policies. After briefly outlining the typology approach within the literature on diaspora engagement policies, I identify 3 analytical blind spots in this stream of scholarship, which I examine in the following sections. I then propose the concept of global nation-building as an alternative framework for a more comprehensive understanding of diaspora engagement policies – one that renders these analytical blind spots visible and integrates them into an encompassing analytical perspective.

Typologies of diaspora engagement policies

Just as there is a myriad of different types of diaspora engagement policies, the attempts to typologise the various policy approaches and explain *why* states engage their diasporas are legion.

Levitt and de la Dehesa (2003), for example, distinguish between (1) ministerial or consular reforms, (2) investment policies aimed at drawing remittances from abroad, (3) the extension of political rights via dual citizenship or the right to vote from abroad, (4) the provision of state services abroad and (5) symbolic policies ‘aimed at reinforcing emigrants’ sense of long-term membership’ (2003: 589–598). Another example is Østergaard-Nielsen (2003: 4), according to whom diaspora engagement policies are developed to pursue specific state interests: first, ‘to secure continuous inflow of economic resources’; second, ‘to mobilise political support and control subversive political dissidence’ and third, ‘to promote the upward social mobility of overseas nationals’. Gamlen (2006) identifies 3 main types of diaspora engagement policies. First, ‘capacity building policies, aimed at discursively producing a state-centric “transnational national society” and developing a set of corresponding state institutions’. Second, policies that are ‘extending rights to the diaspora, thus playing a role that befits a legitimate sovereign’.

Third, 'policies that are extracting obligations from the diaspora, based on the premise that emigrants owe loyalty to this legitimate sovereign' (Gamlen 2006: 5–6). Another example is Ragazzi (2014: 78) who develops an 'inductive typology' of diaspora engagement policies based on 2 statistical criteria: first, 'the type of state sector "exported" to the population abroad'; second, 'the level of transnational inclusion in a system of rights'. On this basis, Ragazzi establishes 5 state ideal-types: first, 'the expatriate state'; second, 'the closed state'; third, 'the global nation-state'; fourth, 'the managed labour state'; and fifth, 'the indifferent state' (Ragazzi 2014: 80–82). Koinova and Tsourapas (2018) discern utilitarian, identity-based and governance-oriented explanations as to why states engage their diasporas. The utilitarian perspective encompasses policies engaging diasporas as a source of remittances or as a leverage to promote political agendas. The identity-based explanation perceives diasporas 'as sources of *symbolic power*' and constitutive elements of the titular nation of the state of origin. The governance perspective, eventually, focuses on the 'multiple processes and channels' through which states engage their diasporas (Koinova and Tsourapas 2018: 313). Finally, Tsourapas (2020: 137) distinguishes between *exit* policies that 'regulate aspects related to emigration from the country of origin', *overseas* policies that 'target population groups beyond the territorial boundaries of the nation state' and *return* policies that 'set processes of readmission into the country of origin'.

Three blind spots

While these typologies of states' diaspora engagement policies highlight the great diversity of approaches and explanations as to why states engage with their diasporas, they are also marked by several blind spots. First, the focus on differences between the various types of diaspora engagement policies obliterates their commonalities. Second, the focus on explanations as to *why* states engage with their diasporas tends to lose sight of questions about *how* diaspora engagement policies relate to central structural principles of the contemporary global political order. Third, the focus on the policies of sending states *vis-à-vis migrant* diasporas tends to obscure the specific case of *accidental* diaspora engagement policies.

- Blind spot I: Commonalities between different types of diaspora engagement policies

What all of the above-mentioned typologies of diaspora engagement policies share is an almost exclusive emphasis on the *differences* between distinct types of such policies. While these typological approaches undoubtedly have their analytical merits, they tend to obscure the underlying structural commonalities which, in principle, characterise all diaspora engagement policies. More precisely, virtually all diaspora policies converge in their reference to what I term *the nation-state form*.

The nation-state form constitutes a specific *institutional logic* that organises the relationship between the state and the individual through the interrelated categories of citizenship, territory and national belonging. In its ideal-typical configuration, the nation-state sustains relations with the *resident citizen*, who is deemed a member of the state's titular *nation*. As in many other instances – such as in the case of immigrants or national minorities – this ideal-typical model does not always correspond to empirical realities on the ground. Yet, it continues to structure the ways in which states imagine, categorise and govern their diasporas.

In other words, all diaspora engagement policies are structurally similar in that they simultaneously refer to and reconfigure the 3 constitutive tenets of the nation-state form: they establish a rights- and obligation-based relationship between the state and the individual (citizenship), regulate access to the

state's territory and address individuals beyond the boundaries of territory and, at times, citizenship on the basis of national belonging.

- Blind spot II: How do diaspora engagement policies relate to the contemporary global political order?

Most, if not all, of the taxonomies presented above seek to explain *why* states engage with their diasporas abroad. However, largely absent from this body of research are questions concerning *how* diaspora engagement policies relate to the central structural principles of the contemporary global political order.

The approach pursued in this article departs from a rational-choice-oriented perspective, which focuses on the motivations of individual state actors and, instead, adopts a more constructivist orientation. This shift is already evident in the transition from *why*- to *how*-questions. In conjunction with the focus on commonalities between individual diaspora engagement policies, this approach enables an analysis of the ways in which such policies reconfigure the dynamic constellations of citizenship, territory and national belonging underlying the nation-state form, thereby shaping and influencing the structural patterns of the contemporary global political order.⁵

- Blind spot III: Beyond the sending-state paradigm. The case of accidental diaspora engagement policies

The third blind spot concerns the specific case of accidental diaspora engagement policies. A common feature of the aforementioned taxonomies of diaspora engagement policies is that they focus exclusively on the policies of sending states *vis-à-vis migrant diasporas*. By migrant diasporas, I refer to individuals who reside outside the territorial boundaries of their state of origin but typically retain citizenship of that state. In contrast, *accidental diasporas* consist of *non-resident non-citizens* whose only connection to the state of origin is their national belonging.

This focus has important implications for the perspective adopted by much of the literature, particularly within political science and international relations – fields concerned with the relationship between diaspora engagement policies and the contemporary global political order. While this research analyses how diaspora policies affect national statehood, the nature and functioning of the nation-state form itself is often under-theorised and taken for granted. Consequently, the emphasis on migrant diasporas – individuals located outside the state's territory but generally still holding its citizenship – tends to foreground primarily the categories of citizenship and territory.

Research on accidental diasporas, in contrast, brings all 3 elements of the nation-state form – citizenship, territory and national belonging – into view, since the only link these populations have to their respective state of origin is their national belonging. For this reason, incorporating the literature on accidental diasporas and thus bridging the 'definitional divide' (Waterbury 2010: 132) between the literatures on migrant and accidental diasporas is particularly instructive.

Global nation-building as an alternative perspective

In order to address the 3 analytical blind spots of the existing approaches to typologising state-driven diaspora engagement policies, this article treads a different path. Rather than offering yet another taxonomy of diaspora engagement policies, this article proposes to conceive of these policies as a form

of (global) nation-building. To be sure, this article is not the first attempt to frame diaspora engagement policies in such a fashion.

State-driven diaspora engagement policies have been variously defined as a form of 'transnational nationalism' (Ang 2004), 'transsovereign nationalism' (Csérge and Goldgeier 2004: 26) and 'kin-state nationalism' (Kántor 2004: 105), thus underlining the importance of the concept of the nation in this context. Additionally, a number of scholars have interpreted state-diaspora relations in general – and diaspora engagement policies specifically – as being intimately related to processes of nation-building.

As Adamson (2016: 296; my emphasis), for example, explains:

Diaspora engagement policies can be viewed as an extension of earlier forms of nation building. Just as states have historically utilised the ideology of nationalism as a means of securing the loyalty of populations within their borders, they are also increasingly trying to tie the loyalties of populations living abroad to the state.

In a similar vein, other scholars investigating state-diaspora relations and diaspora engagement policies have referred to these efforts as forms of 'extra-territorial nation-building' (Bauböck 2003: 707) and highlighted the role of diaporas in 'homeland nation-building' (Dickinson 2019: 260) as well as 'transborder nation-building' projects (Pogonyi 2017: 4).

What all of these, undoubtedly valuable, approaches have in common is that their notion of nation-building is largely taken for granted (for rare exceptions see, e.g., Džankić 2015). However, as I argue in this article, the concept of (global) nation-building needs to be unpacked in order to grasp its nature and functioning, its interconnections with diaspora engagement policies and its relationship to the central structural patterns and dynamics of the contemporary global political order.

Diaspora engagement policies as global nation-building

What is nation-building?

Nation-building is usually understood in one of the following 2 ways (see Mylonas 2012; Wimmer 2018). First, as a way of (external) democratic state-building operations, often after regime change and external intervention. Understood in this way, nation-building is 'a broader effort to promote political and economic reforms with the objective of transforming a society emerging from conflict into one at peace with itself and its neighbours' (Dobbins, Jones, Crane and Cole DeGrasse 2007: xvii). Historical examples of such, often US-led, nation-building efforts range from post-Second World War Germany and Japan to the failed attempts to democratise Afghanistan and Iraq at the beginning of the 21st century (Dobbins 2003).

Second, in the tradition of scholars such as Karl Deutsch (1953; see also Deutsch and Foltz 1966), Reinhard Bendix (1964) and, later, Rogers Brubaker (1996), nation-building is generally understood as a form of '[p]olitical integration and national identification' (Wimmer 2018: 1) of non-core groups (residing on the respective state's territory) into a state's titular nation. Continuing this tradition, Harris Mylonas (2012: xx) defines nation-building as 'the process through which governing elites make the boundaries of the state and the nation coincide'. In this way, Mylonas' definition of nation-building draws on Ernest Gellner's notion of nationalism as 'primarily a political principle, which holds that the political and the national unit should be congruent' (Gellner 1983: 1).⁶ Nation-building then refers to

the never-ending process of achieving this congruence, i.e. a non-essentialist notion of nationalism understood in this tradition as a political process rather than a primordial property. To understand the concept of nation-building as such thus requires, in a first step, understanding the concept of the nation.

One of the most widely accepted definitions of 'nation' is Benedict Anderson's constructivist notion of nations as *imagined communities*. Anderson (2006: 6; my emphasis) defines the nation as 'an imagined *political* community – (...) imagined as both inherently limited and sovereign'. While this definition has become canonical for understanding the nation as a socially constructed entity, its analytical limits become visible once we ask more systematically what renders this imagined community *political*.

[The nation] is imagined because the members of even the smallest nation will never know most of their fellow-members, meet them or even hear of them, yet in the minds of each lives the image of their communion. (...) In fact, all communities larger than primordial villages of face-to-face contact (and perhaps even these) are imagined. (...) The nation is imagined as limited because even the largest of them, encompassing perhaps a billion living human beings, has finite, if elastic, boundaries, beyond which lie other nations. (...) It is imagined as sovereign because the concept was born in an age in which Enlightenment and Revolution were destroying the legitimacy of the divinely-ordained, hierarchical dynastic realm. (...) Finally, it is imagined as a community, because, regardless of the actual inequality and exploitation that may prevail in each, the nation is always conceived as a deep, horizontal comradeship (Anderson 2006: 6–7).

Taken together, nation-building can be understood as the process of establishing a congruence between the nation as an imagined community and its political representation (often achieved in political struggles over the precise shape of the polity) as a (nation-)state.

Nation-building as organising political communities

What is missing in both Gellner's understanding of nationalism as a political principle striving for congruence between nation and state and Anderson's notion of the nation as an imagined community is a systematic specification of how the nation and nation-building are embedded in – and draw from – the contemporary global political order. In other words, what remains underspecified is how the nation becomes a political principle for organising political communities on a global scale. In this article, I therefore seek both to specify the notion of nation-building and to reconceptualise it from a global perspective. Specifically, I am interested in how (global) nation-building translates into practices of organising political communities. In this context, diaspora engagement policies such as the *Karta Polaka* are particularly instructive, because they illuminate how such policies relate to and co-structure the contemporary global political order.

While Anderson's definition of the nation as imagined, limited, sovereign and communal seems comprehensive, it ultimately fails to explain what is *political* about it. It is at this point that this article has something important to add: the nation – and, more specifically, its political operationalisation as the nation-state – as a form of organising political communities worldwide. In this context, nationalism – understood as the political logic inherent in the concept of the nation or, more precisely, nation-statehood – points to the function of the nation as both a political ideology and a source of legitimacy for (global) political order.

Building on Gellner's notion of nationalism or nation-building and specifying it, I understand nation-building as the continuous efforts made by states (as well as political and cultural elites more precisely) to (re-)establish the mythical and ideal-type congruence not only between nation and state but, more specifically, between the boundaries of the concepts of citizenship, territory and national belonging, which are underlying the nation-state form as a model for organising political communities (see Sendhardt 2021). All nation-state policies, as I argue in this article, ultimately aim to (re-)establish this ideal congruence in one way or another in order to secure their legitimacy. Diaspora engagement policies such as the *Karta Polaka* are, from this point of view, a constitutive part of the nation-building project and, because they go beyond the boundaries of national territory and often also citizenship, they could aptly be referred to as global nation-building policies. Analysing diaspora engagement policies as global nation-building policies forces us to examine the ways in which these policies relate to, challenge and alter the nation-state form, understood as the ideal-type congruence of citizenship, territory and national belonging.

Evolutionarily, the nation-state has grown into a 'global archetype' (Agnew 2007: 398) and become the dominant form for structuring the global political realm, gradually ousting or marginalising other forms of political organisation such as empires, fiefdoms, city-leagues and city-states (see also Spruyt 1996). The dominance of the nation-state form as a model for organising political communities is contingent but by no means arbitrary. The idea of the nation-state, i.e. nationalism, captivates above all as 'a theory of political legitimacy' (Gellner 1983: 1). If one understands the idea of the nation-state form as a congruent unity of *citizenship*, *territory* and *national belonging*, then ideally, as a result of the almost complete coverage of the earth's surface with nation-states, every individual is included as a *national resident citizen* – and global full inclusion in the political system has been achieved, at least in theory (see Moeller 2006: 60–61).

There is no question that this diagnosis is contradicted by numerous empirical findings on the ground. More often than not, the conceptual boundaries of citizenship, territory and national belonging are far from coinciding. Examples are legion and can be found in virtually any nation-state around the world. These include migrants who reside on a given state's territory of which they are not citizens and the titular nation to which they do not belong. These include citizens of a given state living abroad as expatriates. These, too, include persons belonging to the titular nation of a state of which they are neither citizens nor territorial residents, as is the case with the addressees of diaspora engagement policies such as the *Karta Polaka*.

However, the nation-state form is not a model *of* but a model *for* organising political communities on a global scale.⁷ Thus, global nation-building policies aim at realigning either the realities on the ground or the theoretical model (or both) to make them fit each other by affecting at least one of the nation-state form's constitutive tenets. The exclusion from one sphere serves as a prelude for the exclusion from the remaining spheres. From this perspective, national minorities, for example, may appear 'as a foreign body in the fabric of one's own nation' (Ther 2012: 11) and the method used to remove this foreign body may consist in the renunciation of existing citizenship, restricting naturalisation or some form of ethnic cleansing such as forced deportation, forced assimilation or even genocide. Of course, this also includes attempts at defining persons as belonging to the titular nation – as was the case, for example, with Bavarians as Germans, with Alsacians being successively redefined as Germans and French or with Creole elites constituting themselves as national cores of post-colonial states (Anderson 2006; Brubaker 1994). What all these measures have in common is that they all aim at (re-)establishing the ideal congruence between citizenship, territorial residence and national belonging.

However, the process can also work the other way round, when the inclusion in one of the spheres of the nation-state form serves as a prelude for the inclusion into the other spheres. From this perspective, persons being citizens of State A but not residing on this state's territory and not belonging to this state's titular national majority usually have the right to enter this state's territory and might be even encouraged to do so. Persons being neither citizens nor residents of State A but belonging to this state's titular (ethnic) nation may be addressed by policies of repatriation or diaspora engagement policies such as the *Karta Polaka*.

Either way, nation-states seem to be bound to engage in this never-ending process of achieving congruence, of global nation-building, in order to maintain their global legitimacy as nation-states. From this perspective, diaspora engagement policies such as the *Karta Polaka* are part of a wider spectrum of attempts to ensure the state's role in organising political communities. Part of this are phenomena such as dual or multiple citizenship, an increasing tolerance towards multiple (collective) identities, denizenship but, of course – and foremost – the *national resident citizen*; all of these fall under the umbrella term of organising political communities. Organising political communities can thus be read as a description of 'what a state should look like and how it should act' in a global environment (Sendhardt 2021: 27). In other words, organising political communities refers to these multiple ways in which nation-states adapt to challenges posed by globalisation. This article's focus on diaspora engagement policies such as the *Karta Polaka* contributes to answering the question of how states are doing this.

Phenomena such as state–diaspora relations, similar to phenomena such as denizenship, multiple citizenship and multiple collective identities, raise questions about the validity of a Westphalian notion of sovereignty based on the congruency of the concepts of citizenship, territory and national belonging. This is not to say that the Westphalian notion of sovereignty has become obsolete or has been (successfully) contradicted. Sovereignty has always been a myth, an 'organised hypocrisy' (Krasner 1999). However, what it forces the international relations researcher to do is to examine the (paradoxical) shifts in the principle of sovereignty with regards to, for example, state–diaspora relations such as in the context of the *Karta Polaka*. Because what we see is not a dissolution of the inside/outside dichotomy defining membership in political communities through the concepts of citizenship, territory and national belonging; instead, what we see is a continuous process of reconfiguring the boundaries of political communities. Not necessarily by redrawing the boundaries between states but, on a more subtle level, by continuously redrawing and reconfiguring the conceptual boundaries of citizenship, territorial residence and national belonging. Nevertheless, this grand reconfiguration does not render obsolete the principle of national sovereignty itself; rather, it indicates that nation-states are perpetually adapting to these evolutionary challenges to their Westphalian sovereignty.

The *Karta Polaka* as global nation-building in practice

Read through the lens of global nation-building, the Polish case illustrates how states seek to reconfigure the relationship between citizenship, territory and national belonging beyond their borders. Historically, the Poles in the East emerged as an accidental diaspora: they became non-resident non-citizens of Poland not by leaving the country but because Poland's borders moved over them. Their only remaining link to the Polish state was their national belonging, while both citizenship and territorial residence were located in the successor states of the Soviet Union. In terms of the nation-state form, this configuration exemplifies a marked empirical decoupling of its 3 constitutive tenets.

Broader Polish diaspora politics already address this decoupling in differentiated ways. Symbolic and cultural measures – such as the National Day of the *Polonia* and the Poles Abroad, educational programmes and support for diaspora media and organisations – primarily operate on the dimension of national belonging. They reproduce the imagination of a global Polish community that extends beyond the state's territory and citizenry. Repatriation policies and reforms of the citizenship law, in turn, create legal pathways through which selected categories of co-ethnics can (re-)align territory and citizenship by settling in Poland and (re-)acquiring Polish nationality.

The *Karta Polaka* concentrates and intensifies these dynamics. In its original 2007 design, it targeted persons of Polish origin in the post-Soviet space who were neither citizens nor residents of Poland but were recognised as belonging to the Polish nation. By granting them facilitated entry, access to the labour market, education and other entitlements, the card established a structured relationship between state and individual that closely resembles – but does not fully amount to – citizenship. Conceptually, it partially reconnects national belonging and territorial access, while leaving citizenship formally anchored in another state.

The 2016 and 2019 amendments made this (re-)connection to the nation-state form explicit. Linking the card to a permanent residence permit and a fast track to Polish citizenship after 1 year of residence in Poland on the basis of that permit turned the *Karta Polaka* into a temporal bridge from non-resident non-citizen status to full inclusion as a national resident citizen. Extending eligibility in 2019 to persons of Polish origin worldwide, irrespective of their current citizenship, globalised the addressee base of the policy and projected Polish nationhood beyond its immediate regional neighbourhood. In so doing, the Polish state mobilises the *Karta Polaka* as an instrument of global nation-building: it uses diaspora engagement to move empirically fragmented configurations of citizenship, territory and national belonging closer to the ideal-typical congruence that underpins the legitimacy of the nation-state form.

Conclusion

This article has argued that diaspora engagement policies are best understood not merely as instruments of foreign or migration policy but as constitutive practices of *global nation-building*. Moving beyond the typological focus of existing scholarship, which classifies such policies according to their aims or instruments, the article has proposed a conceptual shift: from analysing *why* states engage their diasporas to examining *how* these engagements reconfigure the core categories that sustain the nation-state form – citizenship, territory and national belonging.

Through the empirical lens of Polish diaspora politics – and particularly the *Karta Polaka* – this study has shown how global nation-building materialises in practice. By granting quasi-citizenship rights to individuals who are neither citizens nor residents of Poland, the *Karta Polaka* performs a paradoxical operation. It expands national membership beyond territorial and juridical borders yet, in so doing, reaffirms the Polish nation as an imagined political community. The policy thus embodies a transborder nationalism that challenges the Westphalian separation of domestic and international spheres while simultaneously reasserting the nation-state as the legitimate organiser of political belonging.

From a theoretical perspective, the notion of global nation-building captures this dual dynamic: the persistence of the nation-state form amid its continuous reconfiguration. The proliferation of diaspora engagement policies worldwide illustrates that globalisation has not dissolved the logic of national belonging but has, instead, prompted states to project it outwards, seeking new ways to maintain the symbolic and political congruence of their national communities. This process is neither accidental nor

temporary – it constitutes the contemporary mode through which nation-states sustain their global legitimacy.

Recognising diaspora engagement as global nation-building has several implications for international relations and political science. First, it foregrounds the constitutive, rather than derivative, role of diaspora engagement policies in shaping global order. Second, it invites comparative research into how different regional contexts – especially in the Global East and Global South – develop distinctive variants of transborder nation-statehood. Third, it reopens the question of sovereignty: not as a declining principle but as a flexible, continuously rearticulated foundation of the global political system.

In short, diaspora engagement policies such as the *Karta Polaka* are not marginal or exceptional phenomena. They represent a structural response to the enduring challenge of aligning nation and state in a globalised and continuously globalising world. Understanding them as practices of global nation-building allows us to grasp how the nation-state adapts, persists and reproduces itself within the evolving architecture of global politics.

Notes

1. Here, I follow Brubaker and Kim (2011: 22, fn. 3) in using the term ‘transborder’ rather than ‘transnational’. While both terms are often used interchangeably in the literature, diasporas as a constitutive element of global nations reflect an ‘intra-national’ membership in transborder nations.
2. This is the official English-language version by the Polish Ministry of Foreign Affairs (Ministerstwo Spraw Zagranicznych, MSZ). A more literal translation would be Department for Cooperation with the *Polonia* and Poles Abroad.
3. This emphasis on national diasporas tends to marginalise pre-nation-state diasporas such as the Jewish and the Armenian ones.
4. For Polish diaspora politics during the Second Republic, see Kicingier (2005) and Gabaccia, Hoerder and Walaszek (2007). For the period of the Polish People’s Republic, see Lencznarowicz (2001) and Maszkiewicz (2017).
5. At this point, a caveat is in order. As one reviewer pointed out, this article’s focus on the junction between diaspora engagement policies and the nation-state form, based on the fundamental tenets of citizenship, territory and national belonging, excludes cases of stateless diasporas such as the Kurdish, Palestinian and Roma diasporas, as well as certain forms of authoritarian state–diaspora relations. Both omissions are well justified. In this article, I investigate *state-driven* diaspora engagement policies, which has 2 consequences. First, because my argument centres on diaspora engagement policies enacted by states, I do not consider the case of stateless diasporas. Second, as I focus specifically on diaspora engagement policies, I omit practices by authoritarian states that are not aimed at *engaging* their diasporas.
6. To be sure, nationalism in this context does not mean the chauvinist ideology but the idea that nations organise in states. ‘Nationalism as an organising principle *of* [my emphasis; I would argue it is a principle *for*] political communities’ Mylonas (2012: 17).
7. Here, I follow Rogers Brubaker’s distinction between the nation-state as a model *of* and as a model *for* political organisation. ‘As an *analytical* ideal type, the nation-state is a model of political, social, and cultural organisation; as a *normative* ideal type, it is a model *for* political, social and cultural organisation. In the former sense, *nation-state* is a category of *analysis*, used to make sense of the social world. In the latter, it is a category of *practice*, a constitutive part of the social

world, a core term in the modern political lexicon, deployed in struggles to make and remake the social world' Brubaker (2010: 62).

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Hybrid Regimes and Transnational Practices: The Illiberal Turn in Hungary's Post-2010 Kin-State and Diaspora Engagement

Myra Waterbury* 

This article analyses the changes that have occurred in the nature of Hungary's transnational engagement with both its cross-border and wider global diaspora in the years since 2010. State actors and policymakers in Hungary have shifted towards embracing a 'global nation' framework that encompasses relations with long-established migrant diasporas, and coethnic Hungarian minority communities in neighbouring countries. This shift has created an increasingly complex institutional environment and changed how and why states like Hungary preferentially target or exclude members of their diaspora, with more focus on finding loyal diaspora members within communities rather than differentiating among different types of external communities. Hungary's diaspora engagement has become deeply intertwined with the Fidesz party's attempt to maintain and legitimise incumbent control through a widening menu of illiberal and non-democratic practices, which I term 'illiberal transnationalism'. This illiberal transnationalism has been produced, I argue, by the evolution of Hungary into a hybrid regime with highly constrained political competition. Almost 15 years of single-party rule since 2010 in Hungary has created a much more closed, more ideological, and less transparent policy system. The nature of the Hungarian political regime has, therefore, had a significant impact on the structure and content of its transnational practices, suggesting that scholars of kin-state politics and diaspora engagement need to pay more attention to regime type in their analyses.

Keywords: Hungary, kin-state politics, diaspora politics, hybrid regimes, illiberalism

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Introduction

Hungary has long been one of the most activist kin-states¹ in Central and Eastern Europe, with a long-standing commitment to help preserve and promote the communities of ethnic Hungarians living as minorities in neighbouring Romania, Slovakia, Serbia, and Ukraine and a series of intensifying cross-border projects in the years since 2010 (Bárdi 2020). The expansion of Hungary's policies towards its ethnic diaspora in the region has ranged widely, from the introduction of non-resident ethnic citizenship and voting rights (Pogonyi 2017; Waterbury 2014), to substantial subsidies in the areas of Hungarian minority cultural, educational, and media institutions, and finally, the economic sector (Kiss 2022). In addition, since 2010 Hungary has caught up to much of the rest of world and the broader region in developing specific policies to engage its broader global diaspora (Lesinska and Hejj 2021; Sendhardt 2021), with diaspora engagement now encompassing relations with established migrant diasporas, kin-minorities across the border, and 'post-accession' diasporas throughout Western Europe (Lesińska and Popyk 2021). For example, in March 2022 two Hungarian-government research institutes co-organised a conference titled 'Diaspora Policies in the 21st Century: New Answers for New Challenges', which brought together speakers from a variety of countries in the region to discuss support for and outreach to many different external national communities, from 'constituent Croats' in Bosnia, to Slovene national minorities, to 'autochthonous Serbs' in neighbouring countries, as well as to various emigrant and diaspora communities outside the region. In opening remarks, Árpád Potápi, the Secretary of State for Hungarian Communities Abroad, argued that the Hungarian nation had only been 'reunified' since the Fidesz government developed the first Diaspora Council after it came to power in 2010.² Other Hungarian representatives uttered the widely-used slogans that 'every Hungarian counts' (*'minden magyar számít'*), and that 'every Hungarian child is a treasure to the Hungarian nation'.³ Other Hungarian political actors have stated that 'there are no Category A and B Hungarian citizens... All Hungarians are equally important to us, wherever they live' (Tóth 2020).

This discursive and policy shift towards a global nation strategy occurred as emigration to West European countries has increased throughout the region, creating fears of demographic decline and as migration out of ethnic minority areas has increased, facilitated in part by access to kin-state citizenship (Pogonyi 2017). This has prompted kin-state policymakers to deal with – and attempt to mitigate – the mobility of national members beyond their borders and has made emigrating national minority members part of the kin-state diaspora in many cases. Most crucially, however, there is a growing awareness of the importance of diaspora engagement and the need for states to access and control the cultural, symbolic, lobbying, and economic resources represented by established diaspora communities throughout the world. States representing 'divided nations' in an increasingly mobile and demographically shifting region must deal with multiple types of external communities and can no longer give attention to only kin-minorities or one type of diaspora (Waterbury 2020b).

However, this unifying discourse also masks a number of tensions and problematic outcomes that have emerged as Hungary's diaspora engagement practices have developed and its cross-border engagement with its minority communities has intensified since 2010. The first surrounds whether the diaspora communities are seen as partners in shaping transnational relations or as passive recipients of the state's largesse. As Gamlen (2019) argues, states may 'embrace' and 'tap' the diaspora as resources by actively trying to cultivate economic and political ties that would benefit the homeland as well as the diaspora members. Conversely, the state may see its role more paternalistically and use its resources to 'help' diaspora communities by providing resources with little space for open discussion of how those resources are used, and what the diaspora might offer in return. The research I conducted in 2022

suggests that Hungary's policies favor the latter approach of keeping more control of support given to the diaspora without discussing the expectation of concrete 'returns' on its investment. This is despite the fact that some diaspora members would like to be seen more as partners in this transnational relationship.⁴ This paternalistic approach by the Hungarian regime has also allowed it to expand its illiberal views and clientelistic networks into the Hungarian minority communities in neighbouring countries, leading to what some critics have called the 'diasporisation' of the cross-border communities (Kerényi 2024). Diasporisation in this case constitutes a critique levelled at the Hungarian regime's increasingly heavy-handed influence in the Hungarian minority communities, often by members of those communities, that Hungary now seeks to 'govern' its coethnic diaspora, rather than seeing them as partners in the struggle for minority cultural rights and political representation at home.

The second aspect relates to how transnational policies and practices construct and reproduce 'differential treatment (...) of various communities within a diaspora' (Délano Alonso and Mylonas 2019: 475). In order to develop a more nuanced understanding of the targeting of different segments of the diaspora, we need to better understand what kind of diaspora the state is seeking to promote and construct, the types of transnational projects the state is promoting, and the tools it uses in its diaspora engagement. State policies and approaches are not being parsed just between cross-border kin communities versus global diaspora communities, but between elite versus everyday diaspora members, those with varying levels of cultural and linguistic knowledge, those with or without access to political patronage networks, and those willing or not to 'perform' national identity in the manner preferred by the homeland state government. As I explain in more detail in the final section of the article, the Hungarian government since 2010 has intensified its political and ideological penetration into the cross-border Hungarian communities, using three primary tools: 1. The co-optation of Hungarian language media; 2. Increasing levels of financial support in a growing number of areas, from culture to language to economic development; and 3. The construction of organisations and institutions that function as tools of political socialisation. Together, these tools construct a robust network of transnational clients dependent on the Hungarian government, and orient public opinion and political discourse within the ethnic diaspora communities to align with the priorities of Budapest. This clientelistic, centralised, and state-centric approach to the cross-border diaspora has then been replicated to some degree in the development of Hungary's increasing engagement with its global migrant diaspora outside of Europe. Programmes privilege those segments of the diaspora that display identity and political loyalty to Hungary, and the specific needs of different diaspora communities are largely subsumed to the broader goals of the Hungarian government.

The article argues that this illiberal transnationalism – the increasingly illiberal and non-democratic practices that have come to characterise Hungary's diaspora engagement – has been produced by the evolution of Hungary into a hybrid regime with highly constrained political competition. Almost 15 years of single-party rule since 2010 has created a much more closed, more ideological, and less transparent policy system. As I argue below, the nature of the Hungarian political regime has had a significant impact on the structure and content of its transnational practices, suggesting that scholars of kin-state and diaspora engagement need to pay more attention to regime type and the political context of the policy process in their analyses. The next section lays out the relationship between regime type and diaspora policies in the literature, focusing on the specific characteristics of hybrid regimes and the types of transnational policies and practices they tend to produce. In the final sections I draw upon research conducted in Hungary in 2022 and subsequent analysis of Hungary's kin-state engagement and global diaspora outreach to illustrate how the policies produced by Hungary's hybrid regime has

impacted its engagement towards ethnic Hungarian communities in neighbouring countries, as well as its broader approach to global diaspora management.⁵

Hybrid Regimes and Transnational Practices

Regimes of all types, be they more or less democratic or authoritarian, seek to engage their diaspora populations. Different kinds of regimes instrumentalise diasporas and increasingly seek to ‘govern’ them through institutions of transnational outreach, offering special benefits, and expanding external citizenship and enfranchisement (Umpierrez de Reguero, Yener-Roderburg and Cartagena 2021) in exchange for political and financial remittances. More or less democratic regimes may also ‘securitise’ diaspora populations, seeing them as either threats or under threat, and therefore in need of protection by the state (Abramson 2024). There are important differences, however, in how different types of regimes engage their diasporas. In democratic regimes, we would expect there to be more pluralism, competition, and transparency in diaspora policymaking. Democratic political competition brings policy debates into the open, provides more transparency about what kinds of programmes and which diaspora actors are being funded, mitigates against policy capture by one set of political actors, and provides more space for political voice and participation by diaspora members (Gherghina, Tap and Soare 2022; Paarlberg 2019). Together, these factors make extremism, patronage, and corruption in diaspora policymaking less likely or at least less impactful. While some political actors will want to co-opt and use diaspora engagement and transnational networks for their own strategic ends, real political competition ‘will constrain the most dangerous forms’ of instrumentalising external kin communities (Waterbury 2010: 3). On the other end of the spectrum, we know from the growing literature on diaspora engagement by authoritarian regimes that ‘extraterritorial authoritarian practices’ (Glasius 2017) involve a much higher degree of co-optation, enforcement of ideological hegemony, and repression of external populations. Diaspora members that are willing to support and legitimise the regime, either through the enforcement of loyalty or in exchange for patronage are lauded by the regime (Orjuela 2023), while those who are critical face a range of ‘transnational repression’ techniques, including surveillance, threats, coerced return, coercion-by-proxy, lethal retribution, and disappearances (Moss 2016; Tsourapas 2019).

Hybrid regimes possess aspects of both authoritarian and democratic regimes, but also include some unique characteristics. Hybrid regimes have democratic rules in place and allow elections to be conducted, but those rules are frequently and systematically violated or partially replaced with ‘hypermajoritarian strategies’ (Levitsky and Way 2020), leading to unfair political competition and weak, poorly functioning liberal institutions (Bozóki and Hegedűs 2018). In addition, leaders of hybrid regimes are more likely to utilise populist and ethnonationalist strategies (Levitsky and Way 2020) to justify the weakening of liberal institutions, limits on majoritarianism, and the curtailing of competitive politics while legitimising continued governance by the incumbent. Hybrid regimes may also rely increasingly on patronalism and clientelism to maintain incumbent hegemony (Magyar and Madlovics 2020) by limiting spaces of ‘autonomous existence’ and encouraging dependence on the regime, what Enyedi (2024) has called ‘paternalist populism’. The existing literature provides less guidance on how the unique characteristics of hybrid regimes translate into diaspora governance and other extraterritorial strategies and outcomes (Karabegović 2024). Drawing on the parameters of hybrid regimes described above and recent work done by scholars of cases such as Turkey and Hungary, I highlight below the three aspects of hybrid regimes that are most impactful in terms of how they engage diasporas and coethnics in neighbouring countries.

The first involves attempts to limit political and ideological competition through institutional policy capture, curtailing independent press and media, remaking electoral rules and districts to favour incumbents, and weakening independent civil society organisations. Hybrid regimes may place diaspora engagement policymaking out of the reach of legislatures by locating it under new cabinet positions or the control of the MFA or the Prime Minister's office. These institutional moves prevent access by opposition parties to diaspora policymaking, further reinforcing messages that external outreach is 'owned' by the incumbent party and is too important to be subject to partisanship. These messages are then amplified in the 'politicized state media and the co-opted private media' (Levitsky and Way 2020) as well as in diaspora media sources that are tied to and funded by the regime. Gerrymandering and the manipulation of electoral rules to benefit the incumbent may also be applied to external voting, with pro-incumbent diaspora populations given easier voting access than those more likely to support the opposition. While hybrid regimes still conduct elections, this policy capture combined with limited access to independent media at home and abroad and differential external voting access can shut out opposition parties from competitive campaigning in key diaspora communities. For example, Turkey's AKP party has been the main recipient of external votes in European diaspora communities (Adamson 2019; Yabanci 2021), and Hungary's Fidesz received over 90 per cent of the votes from the Hungarian minority communities in neighbouring countries in the 2022 election (Waterbury 2025). Finally, the regime may try to control and manipulate 'diasporic civic spaces' by cutting funding or isolating and discrediting NGO leaders, then flooding the space left by them with regime-controlled or dependent NGOs (GONGOs) (Böcü and Panwar 2022; Şenay 2022; Yabanci 2021).

The second aspect is the establishment of ideological hegemony and the reframing of governing legitimacy by the hybrid regime. This is done through the use of populist, illiberal, and ethno-nationalist narratives, the dissemination of those narratives through regime-captured media, and the creation of 'regime-friendly publics' in the diaspora through programmes of political and ideological socialisation. Hybrid regimes may be characterised by 'populist diaspora engagement' that utilises a 'civilisationist discourse' to construct the idea of a homogenous people abroad as well as a polarising discourse that pits them against 'enemies abroad' (Böcü and Panwar 2022) and enemies within (Waterbury 2020b). In practice, transnational populism as diaspora engagement often seeks to construct an 'expansive' conception of a global diaspora through homogenising narratives and state institutions that encompass different types of diaspora communities within the same framework in an attempt to prevent 'intra-diasporic politics' from rising to the surface (Adamson 2019). Populist and illiberal regime narratives and disinformation are then exported into diaspora and minority-language media (Political Capital 2023), which over time can shift public opinion within the diaspora to align more with the external regime. The homogenous 'people abroad' must also be made into loyal subjects through projects of 'public pedagogy and political spectacle' (Şenay 2022), such as homeland educational and internship trips (Abramson 2017; Kantek, Veljanova and Onnudottir 2021; Molnár 2023), the creation of political, cultural, and social capacity-building projects within the diaspora, and performative and ritualised interactions between regime and diaspora actors (Şenay 2022). These ideological narratives also relate to the foreign policy interests of hybrid regimes. Hybrid regimes such as Hungary engage in 'populist argumentation' to justify its revisionist and often illiberal foreign policy goals, often targeting Brussels and West European states as enemies to state sovereignty while courting closer relations with Russia, China, and Turkey (Visnovitz and Jenne 2021). These regimes may use expansionist diaspora engagement to stake a claim as a key player in a broader region, often tied to historical narratives of past greatness, such as Turkey's neo-Ottomanist vision (Adamson 2019; Şenay 2022), Hungary's neo-Carpathian narratives (Balogh 2021), and Russia's 'Russian World' concept (Laruelle 2015), or to civilisationist discourses around shared religious

traditions or commitments to anti-liberal and strongly statist political traditions (Böcü and Panwar 2022; Enyedi 2024). In this way, the regime can use its influence in the diaspora as a form of soft power to support its broader foreign policy goals.

The third aspect centres around the clientelism and patronage politics that drive funding and policy decisions by the regime. As a result, we see that diaspora policymaking in hybrid regimes may be characterised by high degrees of centralisation, top-down decision-making, and a lack of transparency surrounding who is making decisions about policy priorities and resource distribution. We are likely to see benefits and perks provided to political allies of the regimes within the diaspora, and the withholding of resources for those not closely allied with the regime incumbent (Şenay 2022; Yabancı 2021). As other scholars have shown, the promise of entitlements to incumbent 'clients' before an election and public threats related to losing those entitlements as the election nears, often framed as the punishment for letting the opposition gain ground, has been a key electoral strategy in Hungary's hybrid regime (Mares and Young 2018). This is also a pattern that we can see during campaigning for external votes (Waterbury 2025). Unlike fully authoritarian regimes, kin-state outreach and diaspora policy-making in hybrid regimes may also rely on the work of dedicated bureaucrats and researchers, who maintain some autonomy in shaping and implementing policies, as long as they do not criticise the incumbent regime too harshly or too publicly.

The election of the Fidesz-led government in 2010 in Hungary gave the party super-majoritarian powers, which the party and its leader, Prime Minister Viktor Orbán, have used to erode liberal democratic checks on majoritarianism and ensure incumbent victory in every subsequent election. Since 2010, the packing of the constitutional court, the *de facto* limits on opposition media access, the manipulation of electoral rules to benefit the incumbent, the corrupt use of EU money to support political patronage networks, and the discursive, ideological, and institutional commitment to 'illiberalism' has shifted Hungary from a democratic to a non-democratic regime that still maintains some of the trappings of democracy (Bozóki and Hegedűs 2018; Enyedi 2024; Levitsky and Way 2020). The scholarly consensus is that Hungary is no longer a democracy, but not quite yet fully authoritarian or autocratic. Freedom House categorises Hungary as a Transitional or Hybrid regime⁶ and V-Dem has considered Hungary to be an 'electoral autocracy' since 2019, with one of the 'steepest' democratic declines in the world in recent times (V-Dem Institute 2024). The Fidesz-led regime also combines discourses and strategies employing populist nationalism (Waterbury 2020b) or ethnopopulism (Jenne 2018), as well as illiberal populism (Bozóki and Hegedűs 2018) and civilisationist discourses (Enyedi 2024). Connecting the changes in Hungary to the key transnational aspects of hybrid regimes outlined above, I argue that Hungary's diaspora engagement has come to be characterised by 'illiberal transnationalism', the exporting of illiberal regime practices and ideologies into diaspora communities through attempts to establish media, ideological, and political hegemony. This is accomplished through the dissemination of illiberal ideas through regime-captured media, the co-optation of diaspora actors via cross-border patronage networks, and the establishment of organisations and institutions at home and abroad that support regime-friendly socialisation. In the next section, I explore in more detail how this has played out in practice in Hungary's relationship with both its cross-border ethnic diaspora and parts of the wider global diaspora.

Hungary's Illiberal Transnationalism in the Cross-Border Diaspora Communities

The first aspect of Hungary's illiberal transnationalism that has played an increasingly large role in Hungary's cross-border ethnic communities in neighbouring Romania, Slovakia, Serbia, and Ukraine is control of Hungarian-language media by the Hungarian regime and its allied parties and organisations across the border. This is done through the buying up and funding of the diaspora media space, the suppression of independent Hungarian-language journalism, and the exporting of illiberal propaganda and disinformation into Hungarian minority communities through traditional and social media. Market acquisition of traditional media that requires significant and ongoing financial support, such as print and television, by regime-allied actors has led to the co-optation and transformation of formerly independent media outlets, which has further marginalised and pressured the remaining outlets for more critical and independent journalism (Political Capital 2023). It has also given editorial and financial control over major Hungarian language media sources in the diaspora communities to the minority political parties and organisations most loyal to the Hungarian regime. They then have the power to remove more independent-minded editors and journalists, to shape content to match that coming from Hungarian state media, and to amplify the regime's preferred messaging on a range of key issues, such as criticism of the EU and more pro-Russian positions on the war in Ukraine.

For example, in Serbia Hungarian institutions such as Hungarian-language television and newspaper are largely funded by a foundation that was created to distribute funds coming from the Hungarian state and which is controlled by VMSZ, a Hungarian party closely aligned with Fidesz. The Fidesz regime and its allies have used this power to remove independent leaders from the main television station and independent editors from the main Hungarian-language newspaper (*Magyar Szó*), and shut out opposition voices from the traditional media, forcing non-regime aligned actors to turn to internet portals and other less visible platforms (Gál 2020). In Slovakia, critical voices within the diaspora have described a 'coup' in Hungarian-language media (Political Capital 2023), with those supporting the Fidesz-aligned parties taking up more and more room in the media space, and Hungarian-language television dominated by Hungarian state-controlled stations (Czímer 2023). In Romania, ownership of Hungarian-language media has become consolidated in the hands both a regime conglomerate and one controlled by the regime-allied minority party, RMDSZ (Political Capital 2023). In addition, Hungarian government subsidies to the RMDSZ-controlled media association have increased since 2021, allowing them to construct an 'alternative world' supporting Hungary's illiberal messaging (Vig and Babos 2022). Fidesz MEPs have also used diaspora visits to criticise critical journalists, even calling them out and threatening them by name, as happened in the run up to the 2022 Hungarian state elections (Vig 2022a).

The conglomeration and homogenisation of Hungarian language media spaces in the diaspora communities matters not only because it suppresses and silences alternate voices, but also because of the illiberal messages and disinformation it allows to be transmitted. The ideological vision coming from Budapest includes a 'sovereigntist' conception of nationalism and legitimacy that favours alliances with Russia and China and pits Hungary and its ideological allies against Brussels/EU and the West, with particular disdain for liberal protections against sexual orientation and gender-based discrimination, the international obligations of asylum processing and refugee protection, and the role of NATO and the United States in 'pushing' Russia to war in Ukraine and not forcing Ukraine to the negotiating table (Kerényi 2024; Székely 2023; Vig 2022b; Vig and Babos 2022). Fidesz's rhetoric also creates an alternate conception of minority protections, one in which only a strong, sovereigntist, unabashedly statist regime can protect the broader nation and its diasporas abroad; where the liberal ideals of human rights protections and supranational rights frameworks within the EU have failed to protect the collective

rights of deserving cultural minorities, those representing 'traditional', Christian, and fundamentally 'European' cultural groups (Kerényi 2024; Kertész 2022; Kiss and Toró 2023; Vig and Babos 2022).

These transnationalised illiberal messages and the broad influence they are having in shifting public opinion in the diaspora communities present numerous dilemmas for political actors in the ethnic diaspora communities. Hungarian researchers in Romania have described the situation as follows: 'Fidesz's campaign machine has seeped into Transylvania, shaping Transylvanian Hungarian public opinion in its own image on issues such as relations with the EU, migration, or the Russian-Ukrainian war. Research has shown that Hungarians in Transylvania are moving further and further away from the Romanian social consensus and are aligning themselves with Fidesz propaganda' (Kiss and Toró 2023). This public opinion research has found more vaccine scepticism, more pro-Russia views, more anti-immigrant views, and less support for Ukraine among the Hungarian minorities than most Romanians, all findings that mirror propaganda transmitted from the Hungarian regime (Kerényi 2024; Lengyel 2023). This in turn has complicated the position of some minority political representatives, particularly those in Romania and Ukraine, who still need to bargain with majority political actors. They have had to walk a line of trying not to alienate the more liberal majority, while at the same time not straying too far from the increasingly illiberal views of their own constituents, a process some have referred to as 'double speak' (Kiss and Toró 2023).

Further deepening these difficult dynamics for minority political parties, the second aspect of Hungary's illiberal transnationalism is the cross-border co-optation of diaspora actors through Hungary's 'support policy'. The dramatic increases in cross-border funding by the Hungarian regime through processes lacking in transparency and dialogue with stakeholders has worsened clientelism and increased the dependence of minority political actors and institutions on the regime. Internal critics of these dynamics argue that Fidesz and its non-democratic practices have been able to establish a significant degree of hegemony and control over the minority political elite, first, through financial support conditional on political loyalty. Key minority elites engaged in 'loyalty competition' for resources coming from Hungary and entered into a dependency relationship with the regime based on continued access to patronage (Gál 2020; Kiss and Toró 2023; Nagy 2022; Vig 2023; Vig and Babos 2022). Fidesz has also funded and constructed political and cultural institutions in the diaspora that are socialising a new generation of minority elites and non-elites within Fidesz's world views, creating another layer of dependency that extends to the everyday lives of those in the minority. The Fidesz regime has funded sports teams and constructed training facilities across the border (Pavalasc 2022); renovated historic buildings (Vig and Babos 2022); elevated the status of rural elites (Nagy 2022); and created political training academies and networks, such as the Mathias Corvinus Collegium, as a way to disseminate regime-friendly ideas across the border and across time to the upcoming generation of diaspora leaders (Kiss and Toró 2023).

This dependency and co-optation undermine the political agency of the ethnic diaspora communities, as they have become more passive actors in a process of 'diasporaisation' through which they are being governed by Budapest, rather than being supported in their own identity- and community-building projects. As one analyst described the situation facing the Hungarians in Romania: 'Under pressure from Hungary's ruling party, it [RMDSZ] gradually abandoned its own goals and became a weightless, marginal player in national political strategy. The future of Hungarians in Transylvania is now determined by Budapest, which may further deepen the identity crisis and collective sense of failure of the RMDSZ' (Levente Salat, quoted in Vig 2024). In addition, as some critics have argued, Hungary is increasingly 'subsuming' the interests of the ethnic diaspora communities to Fidesz's geopolitical ambitions and 'geopolitical sovereignty building' (Kerényi 2024; Nagy 2022). For example, Hungary did

not lodge complaints against Slovakia's new law that forces NGOs to register as 'foreign-funded organisations', even though this law could create additional burdens for Hungarian groups there, because Hungary's controversial 'Sovereignty Protection Office' does the same.⁷ At the same time, Hungary has resisted Ukraine's attempts to move towards EU membership, arguing that the hesitancy is about Ukraine's treatment of its Hungarian minority, while members of the Hungarian community there have asked Hungary to support Ukraine's accession (Loustau 2025). The irony, though, is that more Hungarian Ukrainians have fled to Hungary since the beginning of the war, and the community there has shrunk considerably.

Hungary's Illiberal Transnationalism in the Wider Global Diaspora

Moving to Hungary's approach to its wider global diaspora, particularly communities in North America and incipient diasporans in Western Europe, we see some similar patterns, but also some key differences. Institutionally, Hungary's global diaspora outreach is characterised by the proliferation of programmes and conduits of funding, many of which appear to compete or provide parallel services, reflecting clientelistic networks and a lack of transparency about how and why new programmes and institutions are created (see Nowak and Nowosielski 2021 on Poland). At the same time, global diaspora policy and the approach to recent emigrants is subsumed and deprioritised in relation to Hungary's kin-state commitments (Waterbury 2018) and in relation to the Fidesz regime's existing ideological priorities, such as 'family friendly' pro-natalism, demographic nationalism, and the construction of a global network of regime defenders. Hungary's broader diaspora engagement also relies on political patronage networks to determine who gets funding, who shapes policies, and who speaks for diaspora communities. Access to programmes and funding of diaspora programmes is heavily weighted to those with proven membership in a core set of politically loyal and culturally conservative institutions, such as church-related groups and the Hungarian Scouts. Hungary's diaspora engagement also privileges symbolic belonging and cultural identity performance through programmes that construct a unified sense of Hungarian identity in line with Fidesz discourse and priorities. However, the regime lacks the kind of direct pathways to diffuse its illiberal ideas that it uses for the cross-border ethnic diasporas, so the levels of regime dependency and co-optation in the migrant diaspora communities of North American and Western Europe are much more limited.

To understand the compromised institutional position of Hungary's broader diaspora engagement, I first highlight the existence of two research and policy institutes funded by the Hungarian government that deal with external national communities, the NPKI (*Nemzetpolitikai Kutató Intézet* – Research Institute for Hungarians Abroad⁸) and the NSKI (*Nemzetstratégiai Kutatóintézet* – Research Institute for National Strategy). Both are clearly institutionally grounded in cross-border kin-state outreach, research, and policy but have taken mandates to address wider diaspora research and policy as well. There are also unclear institutional and policy territory boundaries between two, raising questions about why the NSKI, which answers to the Deputy Prime Minister's Office, was created and funded while the NPKI, which is under the auspices of the State Secretariat for National Policy, had already been established. The vice-director of the NSKI explained to me that the NPKI has a more public political role, while the NSKI does more practical, 'scientific' research.⁹ However, questions remain as to why Jenő Szász, a former Hungarian Romanian politician close to Fidesz, was given his own institute. NPKI also seems to have a larger diaspora politics and policy portfolio than NSKI, though the latter has done some research among the West European diaspora communities, including among members of the more recent emigrants in the UK. In another example, while there are some programmes specific to the needs

of Hungarian communities in Western Europe, such as the funding of Hungarian-language weekend schools, recent emigrant communities continue to be marginalised by the regime because they are seen as less likely to vote for Fidesz (Waterbury 2025; Kovács 2020). It is notable that Hungary only recently created a 'Homecoming portal' for diaspora members in November 2023, which now exists as a website 'created to support and provide information to those returning to Hungary'¹⁰ after years of failed return programmes and promises to create an 'emigration and diaspora center' that never materialised (Semjén 2019).

Another interesting example is Kopp Institute for Demography and Families (KINCS), a research institute created in 2018 to support the Fidesz government's emphasis on 'family policy' that has also entered the diaspora policy realm by making existing pro-natalist benefits accessible to diaspora Hungarians. According to Balázs Molnár, the VP for Strategy and Coordination for KINCS, they had made it easier for emigrant Hungarians to access pro-natalist benefits such as the Baby Waiting (*Baby Varó*) loan programme as way to incentivise return, and had created the 'Umbilical Cord Programme', which gives minor one-time payments and a baby bond to families that have Hungarian babies outside the borders of the state.¹¹ KINCS includes both global diaspora and kin-minority communities in its portfolio but offers primarily symbolic benefits, targets a very specific type of Hungarian in the diaspora, and is based on a key component of the Fidesz government's programme and brand of conservative ideology that has become part of its domestic and global brand (Fodor 2022). The Umbilical Cord Programme and the presentation of a 'Baby Box' of supplies to families with new babies, for example, are both highly touted as symbols of 'recognition and assistance' to Hungarian families on both sides of border and the value to the nation of those babies, though the actual value of that assistance is fairly nominal. More significant family policy benefits are only accessible for those who pay into the Hungarian state employment system, but importantly this is not tied specifically to long-term residence in Hungary. This aspect, then, is supposed to appeal to Hungarian emigrants working and living in Western Europe, who would have additional economic incentives to finish up their adventure abroad and come home in order to start building a large family, buy a house, and settle down.¹² The existing pro-natalist framework substitutes for a more robust and diverse programme that would engage emigrants as flexible 'citizens of the market' (Paul 2014).

An example of the institutional complexity and political patronage seeping into Hungary's diaspora engagement programmes is the overlap between different organisations that offer scholarship and birthright programmes to Hungarians from the diaspora, and also that send Hungarians into the diaspora to help teach language and culture and preserve diaspora archives. While the cross-pollination between different parts of the global Hungarian nation seems admirable, there appears to be some tension between the support for programmes created specifically to target diaspora engagement (e.g. ReConnect Hungary), and those created primarily for connections between Hungary and the Carpathian Basin that have now extended into the diaspora (e.g. *Rákóczi Szövetség*/Rákóczi Association). ReConnect Hungary is a type of birthright programme that is administered by the Hungarian Human Rights Foundation (HHRF), a US-based diaspora advocacy organisation, but relies on Hungarian government money as well as private donations to help subsidise trips for young adults (18+) of Hungarian background. The Rákóczi Association functioned primarily to run camps that would bring together youth from Hungary and the Hungarian minority communities in the neighbouring countries, to foster connections and understanding. However, the Association then started a Diaspora Programme in 2018, which brought younger diaspora members to Hungary to experience the camps with other Hungarian youth from the region. In addition, the Balassi Institute, in addition to its work supporting weekend schools and Hungarian language pedagogy in diaspora communities (Papp, Kovács and Kovács 2020),

runs a Hungarian Culture and Language Studies programme that targets future diaspora leaders as a form of 'soft power' (Kantek *et al.* 2021). Finally, there are programmes like the Kőrösi Csoma Sándor programme, which sends Hungarians to assist diaspora organisations, and the Hungary Foundation's Visiting Research Fellowship for Hungarians to gain experience at US research institute and think tanks.

On one hand, we can see that these different programme target different populations, with ReConnect focusing on engaging young adults that may want to learn more about their Hungarian background in the hopes they become more committed diaspora members (Abramson 2017; Molnár 2023), the Rákóczi Association targeting diaspora children with some level of Hungarian language knowledge to improve and reinforce their Hungarian cultural belonging, and the Balassi Institute targeting committed diasporans involved in Hungarian linguistic and cultural organisations to shape them into future diaspora leaders who will 'safeguard' Hungarian national identity (Kantek *et al.* 2021). In practice, however, we can see that these various programmes are often competing for the same piles of funding and institutional support. For example, the Rákóczi Association Diaspora Programme brought 1,000 diaspora members to Hungary in 2019, while ReConnect Hungary only was able to fund 20–30 for its programme per year, reflecting both different levels of funding and institutional support, issues that might have been resolved through coordination and more bottom-up initiatives by diaspora organisations.¹³ There have also been tensions around the process for deciding who gets slots for the Balassi programme in Hungary, as well as for the Kőrösi Csoma Sándor programme and Hungary Foundation fellowships in the US, with some working in the diaspora critical of the political patronage networks that seem to drive these decisions.¹⁴ The Hungary Foundation also now offers scholarships to live and study in Budapest to carefully selected Western scholars, most of whom are generally conservative and appear empathetic to the regime and its perspective.¹⁵ This is another form of using mobility and exchange programmes as a way of legitimising the Hungarian regime and creating a global network of defenders.

Conclusion

This article has explored in depth the interaction between changes in Hungary's political regime since 2010, the state's approach to engaging cross-border Hungarian minority communities and the wider global Hungarian diaspora, and the potential impacts on those external communities that maintain ties to Hungary. While discursively Hungary has deployed a more inclusive global nation framework, under conditions of democratic backsliding and the consolidation of a hybrid regime the incorporation of more types of external communities into the state's transnational outreach has created the conditions for fine-grained targeting and marginalisation not only *between* different diasporas but *within* those diasporas. More importantly, the development of Hungary into a hybrid regime has brought with it the expansion of transnational networks, programmes, and practices that attempt to export aspects of its illiberal domestic and foreign policy goals into the cross-border minority communities as well as the wider global diaspora.

Taking these developments seriously, this article offers an analysis of how we should think about diaspora engagement under conditions of decreasing democratic competition. I argue that hybrid regimes are likely to be characterised by a set of specific transnational practices, including co-opting and controlling political and social organisations in the diaspora through curtailing opposition access and expanding patronage networks; establishing ideological hegemony in the diaspora through media and political socialisation; and encompassing the diaspora into the regime's populist, illiberal, and nationalist ideologies and geopolitical goals. I then outlined the specific character of these practices in the Hungarian hybrid regime, which has been characterised by 'illiberal transnationalism'. Finally, I highlighted

some of the ways in which these practices have been transmitted into the Hungarian minority communities in Romania, Slovakia, Serbia, and Ukraine, and how they have impacted Hungary's broader diaspora engagement. While the longer term impact of these developments remains to be seen, over time this form of transnational engagement may result in what Rovny (2024) calls 'illiberal cross-pressures' on democratic stability and majority-minority bargaining in the neighbouring countries. While this is a far less likely outcome in the wider diaspora communities, we could imagine that the political 'ownership' of external engagement policies by one party over time could lead to other detrimental outcomes, such as entrenched clientelism, mistrust of the homeland state government, and more significant politicisation of diaspora cultural programmes.

Notes

1. I define a kin-state as 'a state that represents the majority nation of a transborder ethnic group whose members reside in neighbouring territories' (Waterbury 2020a: 799). Kin-state engagement refers to the set of transnational policies that a state uses to protect and promote members of that trans- or cross-border ethnic group, which can also be considered a type of 'accidental' diaspora (Brubaker 2000).
2. The conference was organised by the Ferenc Mádl Institute of Comparative Law and the Research Institute for Hungarian Communities Abroad, with the support of the Gábor Bethlen Fund (the main conduit for kin-state and now diaspora policy funding and programming). <https://mfi.gov.hu/en/events/diaspora-policies-in-the-21st-century-new-answers-for-new-challenges/>
3. Balázs Molnár, KINCS (Kopp Institute for Demography and Families) at the Diaspora Policies conference. This is also a play on words as 'kins' in Hungarian means 'treasure'.
4. See statements by Zsolt Szekeres, the president of the Hungarian Human Rights Federation and founding member of the Hungarian American Coalition, during the Q&A portion of 'Diaspora Policies in the 21st Century: New Answers for New Challenges', March 28, 2022. <https://mfi.gov.hu/en/events/diaspora-policies-in-the-21st-century-new-answers-for-new-challenges/>
5. This research was conducted while I was a US Fulbright Scholar generously hosted by the Institute for Minority Studies, Centre for Social Sciences, Budapest, Hungary. I also analysed debates and discussions from more independent Hungarian-language media over the last four years, primarily from online media sources that are willing to publish interviews with critical scholars and investigative journalists.
6. <https://freedomhouse.org/country/hungary/nations-transit/2024>
7. Henry Barrett, The Sovereign Protection Office as the Tip of the Iceberg, *Verfassungsblog* (March 15, 2024): <https://verfassungsblog.de/tip-of-the-iceberg/>
8. Though a more accurate English translation would be Research Institution for 'National' Policy, reflecting its pedigree as the reincarnation of earlier research institutes focused primarily on Carpathian Basin Hungarians.
9. Márton Péti, interview with author, April 25, 2022.
10. <https://hazavaro.gov.hu/>. See report of announcement of programme to Diaspora Council here: <https://hungarytoday.hu/government-welcomes-back-hungarians-from-diaspora/>
11. Interview with author, April 19, 2022.
12. B. Molnár, interview with author.
13. Conversation with Zsolt Szekeres of HHRF (April 13, 2022), and Balázs Tárnok (April 21, 2022), who has worked with the Rákóczi Association.

14. Anonymous interview with member of Hungarian diaspora organisation based in the United States (April 13, 2022).
15. See the list of current and past fellows here: <https://www.hungaryfoundation.org/budapest-fellowship-program/>

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Diasporic Mobilisation and Repositioning: The Ukrainian World Congress' Responses to Critical Junctures and Events

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This paper explores the evolving engagements with the homeland by the Ukrainian World Congress (UWC), the leading organisation representing the Ukrainian global diaspora. Using Maria Koinova's concepts of critical event and critical juncture, the study examines the UWC's modes and types of involvement with Ukraine and its repositioning, identifying 4 distinct periods before and during the ongoing war with Russia. The paper also investigates the UWC's persistent campaign for the recognition of multiple citizenship. To this end, it draws on a qualitative content analysis and link analysis of Congress' official website and public Facebook page. This exploration from a top-down perspective demonstrates the repositioning of the UWC alongside the changing prevalence of symbolic, political, organisational and procedural types of involvement. The findings reveal that, despite the Russian existential threat to its homeland, the UWC has not resorted to radical or 'transgressive' rhetoric and actions.

Keywords: diaspora, Ukrainian World Congress, critical juncture, repositioning, Russo–Ukrainian war

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Introduction

Conflict in the homeland is a significant factor affecting the ways in which diasporas operate, engage with their countries of origin and mobilise support for their causes. However, as pointed out by Maria Koinova (2018a), the relationships between diasporas and conflicts are not unambiguous, as conflicts are often blurred, repetitive and of a complex nature. The ongoing Russo–Ukrainian war may serve as an example of such a complex conflict, as it has evolved from internal non-violent resistance to the policies of the Viktor Yanukovich regime to a full-scale interstate war. Arguably, the responses to these developments by Ukrainian diasporas and the ways in which they are being affected constitute an essential field of study. There is an emerging body of literature exploring recent mobilisations (Fihel, Homel, Jaroszewicz, Lesińska and Bentz 2025; Özgür and Deniz 2024; Trzeszczyńska and Demel 2025a, b) that predominantly focuses on the individual level of diaspora entrepreneurs. However, diasporic responses on the collective level of organisations and within a top-down perspective remain under-researched. To address this gap in scholarship, this paper examines diasporic engagements with the homeland and the effects of the escalating conflict on diaspora–homeland relationships, focusing on the leading Ukrainian diaspora organisation, the Ukrainian World Congress (UWC).

Having prioritised its support for democratisation and the European integration of Ukraine, the UWC demonstrates a reconfiguration of its efforts to participate in Ukraine’s development and the shifting of its political stances in response to the changing situation. Michel Laguerre (1999) previously defined such diasporic actions as *reshaping* and *repositioning*. The reshaping involvements with the homeland can be differentiated into symbolic, political, organisational and procedural types (Kozachenko 2019). The repositioning refers to the ways diasporas strategically relocate themselves politically, socially, symbolically *vis-à-vis* homeland, host society or transnational networks. Notably, dramatic changes in the homeland may constitute *critical junctures* (Koinova 2018b) that are manifested in institutional change in diasporas, the state and the society of the homeland – and ultimately reconfigure the relationships between them. Such changes also have the potential for diaspora radicalisation (Beaugrand and Geisser 2016; Koinova 2018a, b; Smith and Stares 2007). Considering these ideas, this paper addresses 2 primary research questions. First, how did the UWC respond to critical junctures in the homeland? Second, did the conflict escalation make the UWC ‘transgressive’ in its rhetoric and actions? Considering that new media have become a key means for diasporic organisations to mobilise support, represent their political interests and promote their agendas (Alonso and Oiarzabal 2010; Krasynska 2015), this study examines the UWC’s engagement through its online presence. It draws on qualitative content analysis (Bryman 2004) and link analysis of the UWC’s website and public Facebook page.

Given that different types of crisis or conflict in the homeland cause varied responses, modes of operation or use of channels by diasporas (Koinova 2018a; Smith and Stares 2007; Sökefeld 2006), this study scrutinises 4 distinct periods: a non-violent conflict (2010–2013) with opposition to the policies of President Viktor Yanukovich; the Euromaidan Revolution (2013–2014); the initial stage of the Russo–Ukrainian war with elements of secessionist conflict (2014–2022); and a full-scale war (2022 and ongoing). The examination of these periods reveals that, despite facing escalation phases of the conflict, the UWC has demonstrated increased mobilisation but has not resorted to a radical or ‘transgressive’ rhetoric or mode of engagement. This paper also argues that the election of Yanukovich, the Euromaidan Revolution and two phases of the Russo–Ukrainian War constitute critical junctures (Koinova 2018b) with evident institutional changes.

In developing these arguments, this paper is organised into 4 main sections. The first deals with the conceptualisation of diaspora and mobilisation in response to different types of crisis in the homeland. It also outlines the differences between critical junctures and critical events. The second section addresses the role of diasporas in the nation-building and democratisation processes in Ukraine and specifies the case of the UWC. The third section outlines the research methods and data that form the empirical basis of this study. The findings on the reshaping and repositioning of the UWC and its responses to critical events and junctures are presented in the fourth section. Then the conclusions are provided. Having pointed this out, it is necessary to outline the conceptual framework of this study.

Diasporas, homeland conflicts and mobilisation

Rogers Brubaker (2005) emphasises the significance of claim-making in diasporic politics, where claims are made to the homeland – such as demands for the right of return or recognition of multiple citizenship – to host countries and transnationally. The dynamic and changing nature of a diaspora is reflected in his definition of it as a ‘category of practice, project, claim and stance, rather than as a bounded group’ (Brubaker 2005: 13). This paper adopts this definition of a diaspora as it underscores articulations of claims and stances as a crucial part of diasporic practices.

The understanding of a diaspora as a process rather than a stable community is well reflected in the studies of diaspora mobilisation (Fihel *et al.* 2025; Kennedy 2022; Koinova 2018a, c; Özgür and Deniz 2024). One of the pioneers of this approach, Martin Sökefeld (2006), proposes introducing elements of social movement studies into research on diasporas: opportunity structures, framing, mobilising structures and organisations. The ideas on framing and organisations are particularly relevant here. Framing not only plays a key role in the motivation for collective action (McAdam, McCarthy and Zald 1996) but it also allows the presentation of causes and goals as universally relevant and significant. Diaspora organisations, similar to social movement organisations (Della Porta and Diani 2006), facilitate the connection of different groups and the mobilisation of resources and ideas.

While there are various definitions of a diaspora (Brubaker 2005; Cohen 1997; Vertovec 1997), the crucial role of ‘imaginings’ or the myth of the homeland (Safran 1991) in the making of diasporic identities and shaping engagement practices is commonly acknowledged. Benedict Anderson (1992) describes the efforts of *émigrés* or exiles to shape the homeland by their specific imaginings as long-distance nationalism. He points out that a safe distance may lead to a lack of accountability and support for reckless or radical initiatives (Anderson 1992). Moreover, the mechanisms and modes of diasporic involvement with the homeland, based on either nationalist or citizenship principles, constitute a crucial area in diaspora studies. Arguably, citizenship manifests both belonging and entitlement to the full rights to participate in the polity (Yuval-Davis 2006) and may be prioritised by diasporas in their relationships with a kin-state.

Laguerre (1999) defines diasporic efforts to change the homeland and the processes of adjusting the diaspora’s position *vis-à-vis* it as *reshaping* and *repositioning*. These concepts reflect the changes that occur both in the state to which they are related and within diasporas themselves, allowing for the tracing of interactional relationships between 3 key elements: state transformation, diaspora influence on the homeland and the transnational nature of state–diaspora relationships (Laguerre 1999). Diasporic involvement with the homeland can be differentiated into 4 main types: *symbolic*, *political*, *organisational* and *procedural* (Kozachenko 2019: 113). Symbolic involvement pertains to the efforts to shape the homeland’s ‘imagined community’ (Anderson 2006) by introducing and amplifying certain narratives and symbols. Political involvement encompasses participation in political campaigns and the

formation of political parties. Organisational involvement refers to the creation of institutions, legislation and organisational structures in the homeland. Finally, procedural involvement is related to the support of the procedural aspects of democracy (Koinova 2009) – notably, dramatic changes in the homeland can fundamentally alter the characteristics and balance of different types of diasporic involvement.

As pointed out by Koinova (2018b), *critical junctions* and *events* directly affect the modes of diasporic mobilisation and engagements with the homeland and may ‘feed’ radicalism. Critical junctures transform international and state institutions, ultimately reconfiguring diaspora–state relationships. For instance, it may move the diaspora strategic centre – a core location for coordinating its activities – from abroad to the homeland and *vice versa*. In contrast, critical events may manifest in a change in scale or magnitude of mobilisation without substantive transformation and may be part of a critical juncture (Koinova 2018b). Moreover, Sökefeld (2006) argues that homeland conflict not just mobilises diasporas but can also create them – as in the case of the Kashmiri diaspora in the United Kingdom. The importance of the conflict in the homeland is reflected by the concept of a ‘conflict-generated diaspora’ as being the one formed by individuals or their descendants who escaped violence or persecution (Koinova 2018a). Terrence Lyons (2007), who coined this concept, argued that this type of diaspora plays a leading role in framing the issues related to the homeland conflict. Depending on these specific connections and other contextual factors, diasporas are thought to have either more moderate (‘contained’) or radical (‘transgressive’) modes of diaspora mobilisation (Koinova 2018a: 312). ‘Moderate’ pertains to the use of state-based and institutional channels, non-violent activities and advocacy, whereas ‘radical’ involves confrontational approaches, maximalist goals and the support of violent and/or repressive means to achieve them. This may include supporting discriminatory policies and militant groups.

Different types of homeland conflict (crisis of democracy, non-violent/violent, successionist/irredentist, internal/interstate, etc.) prompt different diasporic responses. Koinova (2009, 2018c) stresses the crucial role of the *contested sovereignty* of kin-states as a fundamental factor that defines the ways and magnitude of diasporic mobilisations. Diasporas are often capable of constituting a strong opposition to authoritarian regimes in their countries of origin. Recent scholarship has focused on transnational contestations during the Arab Spring (Beaugrand and Geisser 2016; Kennedy 2022; Moss 2022). Claire Beaugrand and Vincent Geisser (2016) emphasise that diasporas may rapidly radicalise, noting that certain pro-democracy diaspora groups have later shown support for radical Islamist ideologies. Thus, it is essential to investigate whether radical goals have replaced positive, initial pro-democratic ones over the course of mobilisation and conflict escalation. The eruption of violence and subsequent transition from non-violent to violent conflict can be seen as a fundamental division here. Discussing internal conflicts, Hazel Smith and Paul Stares (2007) argue that diasporas can contribute to it during the escalation phase. They also point out that diasporas tend to play the role of ‘peace-makers’ when the political line of their homeland aligns with their own and their aspirations for statehood are fulfilled. Notably, interstate conflict often constitutes a critical juncture that leads to profound changes in both the diaspora and the homeland. It is necessary to reiterate Koinova’s idea that different types of conflict can overlap, as seen in Kosovo. In this case, a secessionist conflict overlapped with the interstate one between Serbia and NATO (Koinova 2018b) and had a galvanising and radicalising effect on Albanian diasporas in Western countries. Koinova also stresses that the existence of diasporic organisations is necessary for radicalisation. In sum, considering these ideas on diasporas and mobilisation for different types of conflict, it is essential to highlight the politics, mobilisations and involvement with the homeland of Ukrainian diasporas, discuss previous research and contextualise the case of the UWC.

Ukrainian diasporas, democratisation and the case of the UWC

Before Russia's full-scale invasion, the Ukrainian overseas population was estimated at 6.1 million, placing it 8th in the world in terms of diaspora size (UN DESA 2020). While a significant portion of this population resided in Russia, it was largely silenced by censorship, with the aggressive assimilationist policies and consistent political pressures undermining its subjectivity and preventing the development and empowerment of diasporic organisations. In contrast, Ukrainian diasporas in Western countries demonstrate a high degree of institutional completeness – the level of development of institutions by ethnic groups to further their goals and interests (Satzewich 2002). These diasporas have been actively involved in representing Ukraine within a transnational setting and have significantly contributed to the nation-building and democratisation of their homeland. Their symbolic involvement with the homeland is particularly notable, with diasporas playing a significant role in the construction of national narratives, participating in memory politics and protecting the Ukrainian language (Koinova 2009; Kozachenko 2019). Historians from the diaspora such as, *inter alia*, Ivan Lysiak-Rudnytsky, Omelian Pricak, Orest Subtelny and Serhii Plokhly, played a key role in developing and popularising the Ukrainian historical canon. One of the key achievements of diasporas is the research on and campaign for the recognition of the *Holodomor* – the artificial famine of 1932–1933 in Soviet Ukraine – as a genocide against the Ukrainian people. Similar to the diaspora campaign for the international recognition of the Armenian genocide of 1915, Ukrainian diasporas played a crucial role in lobbying for such recognition in the homeland and worldwide. Since the late 2000s, the *Holodomor* has become a central element of Ukraine's national symbolism of martyrdom, effectively challenging discourses and narratives based on nostalgia for the Soviet Union (Kozachenko 2019). Diasporas also played a key role in amplifying the narrative on the Ukrainian nationalist struggle during the Second World War (WWII). This pertains particularly to the Organisation of Ukrainian Nationalists (OUN) and Stepan Bandera, leader of its radical OUN(b) faction, the Ukrainian Insurgent Army (UPA) and the Ukrainian 14th Waffen SS Division. Per Rudling (2024: 1323) defines such diasporic involvement as 'repatriating and edifying the past', stressing the promotion of uncritical narratives and silencing the discussion on the participation of these formations in the Holocaust and the ethnic cleansing of Poles in Volhynia. He also blames diasporas for the reintroduction of far-right ideology connected to wartime nationalism in Ukraine (Rudling 2024). However, he acknowledges the limited outcomes of the direct political involvement of diasporic right-wingers. The most prominent political party, founded by representatives of the diaspora – the Congress of Ukrainian Nationalists – won a maximum of 8 seats in the Ukrainian Parliament in 1993 and only 1 seat in 2019. A key illiberal achievement of diasporas, according to Rudling (2024), was the successful lobbying and adoption of the 'Decommunisation laws' in 2015. These laws criminalised Nazi and Communist ideologies, provided the list of fighters for Ukraine's independence that included WWII nationalist organisations and penalised the 'disrespect' of them. Thus, in this case, symbolic and organisational types of involvement overlap. As noted by Volodymyr Kulyk (2016), this achievement can be attributed to the Russian aggression. Arguably, the ongoing war may further strengthen this trend.

A positive role in the democratic development of Ukraine is also commonly acknowledged in the contemporary literature on Ukrainian diasporas (Dunin-Wąsowicz and Fomina 2019; Korzh, Kovalchuk and Marshall 2022; Krasynska 2015; Lapshyna 2019; Oleinikova and Bayeh 2019). Olga Oleinikova and Jumana Bayeh (2019) point out that Ukrainian diasporas served as a crucial resource for the democratisation of the homeland. Diasporic positive impact is particularly pronounced by the organisational and procedural types of involvement. Such prominent figures from the diaspora as

Bohdan Krawchenko and Bohdan Hawrylyshyn came to the late Soviet Ukraine and served as advisors to the Parliament of the Ukrainian Socialist Republic. Their contributions were instrumental in shaping the future architecture of the Ukrainian independent state (Kozachenko 2019). Halyna Chomiak – a Professor of Law at the University of Alberta and mother of the former Deputy Prime Minister of Canada, Chrystia Freeland – played an active role in drafting the Constitution of Ukraine. Diasporic procedural involvement helped to educate Ukrainian politicians and officials – including election monitors – and sent representatives of various diasporic organisations to ensure that Ukrainian elections met democratic standards. This support substantially contributed to the development of Ukraine's democratic system and political pluralism. It is necessary to mention 2 critical junctures in this context: the Orange Revolution (2005) and the Euromaidan Revolution (2014).

The Orange Revolution was a protest against fraudulent presidential elections that saw a mass mobilisation of diasporas. They managed to generate a very positive response to it in the West (Koinova 2009), demonstrating the effectiveness of both activism and creative framing. This revolution was peaceful or 'contained' and led to the creation of several organisational initiatives in the West (Dunin-Wąsowicz and Fomina 2019; Koinova 2009). The eventual victory of the pro-Western Viktor Yushchenko also increased the acceptance of diasporas by the Ukrainian state, particularly in terms of memory politics. However, the subsequent lack of progress in democratic development and reforms brought substantial disillusionment and demobilisation in the post-2005 period. In contrast to the Orange Revolution, the Euromaidan caused a much more profound change for the Ukrainian state and diasporas. In line with Sökefeld's (2006) study, which documented the formation of diasporic organisations following mobilisations, the Euromaidan Revolution led to the emergence of a network of new organisations and sustainable initiatives. Organisations like *Razom* and *Global Ukraine* have participated in the largest coalition of initiatives pushing for reforms in post-Euromaidan Ukraine (Korzh *et al.* 2022; Kozachenko 2019). Iryna Lapshyna (2019) documented the emergence of 'Euromaidan London' and 'Euromaidan Warszawa' resulting from the revolution. She stresses, however, that diasporas achieved limited influence on the Ukrainian state and were not considered by it as an important development actor (Lapshyna 2019). Roch Dunin-Wąsowicz and Joanna Fomina (2019: 104) provide a more upbeat evaluation pointing at the positive impact of the 'diasporic civil society' on Ukraine's democratic and institutional development. They acknowledge, however, that repelling the Russian aggression in Donbas has taken a lot of resources from diasporic organisations. Ukrainian diasporic mobilisation in the wake of the full-scale war is the focus of the emerging body of literature (Fihel *et al.* 2025; Özgür and Deniz 2024; Trzuszczńska and Demel 2025b). These studies focus predominantly on the individual perspective and consider new diasporic organisations.

The UWC, however, has a long history and can be considered as the 'old' organisation. The UWC was established in 1967 in Canada as the Congress of Free Ukrainians and adopted its current name in 1993. As the largest and most influential Ukrainian diasporic organisation, the UWC is recognised by the United Nations. Its headquarters are based in Toronto and it claims to represent 'the interests of over 20 million Ukrainians in the diaspora, unite Ukrainian communities and organisations in over 60 countries and work to support a democratic, prosperous, European Ukraine'.¹ In analysing the case of the UWC, Victor Satzewich (2002) points out that, despite its global scale, it is profoundly influenced by several North American diasporic organisations. During the Cold War, the UWC actively opposed the Soviet regime. Little doubt that Ukraine's independence was a critical juncture for the UWC and diasporas in general, signifying the switch from stateless to diasporas with a state. The appreciation of one's own state even had some negative consequences. Koinova (2009) points out that, in the 1990s, the *derzhavnyki* (statists) faction of the UWC was not eager to openly criticise the semi-authoritarian

rule of President Leonid Kuchma (1994–2005), fearing that this might destabilise a newly independent state. Thus, the UWC did not always act as an unequivocal defender of democracy. Notably, in the 1990s, the UWC resisted the integration with the Ukraine-based Ukrainian World Coordinating Council as it would have made it too dependent on the Ukrainian state (Satzewich 2002). Thus, the critical juncture of independence has not led the UWC to move its strategic centre to the homeland. Its procedural involvement with the homeland was very significant, with its electoral monitors, normally numbered in hundreds, participating in all Ukrainian elections (Kozachenko 2019). It must also be emphasised that the UWC can be considered as a conflict-generated diaspora, as it is formed mainly by people descended from participants in the Ukrainian independence struggle during WWII. Moreover, since the 1980s, it has had the leadership originating from the radical OUN(b) faction (Rudling 2024) and, thus, it might be seen as prone to radicalisation. Building on these ideas and previous studies, this paper examines the UWC's involvement with the homeland and its repositioning and reshaping activities through the following methodology.

Methods and data

This study draws on data from the UWC's official website and public Facebook page. The website of the UWC has English and Ukrainian versions and includes official statements manifesting its stances and claims. The website features several sections: one with general information about the organisation and its international network, a news section that features both original news and reposts from other sources and a section dedicated to its programmes and campaigns (such as an educational programme, a network on *Holodomor*, the memberships committee, fundraisers such as 'Stand with Ukraine', etc.). The UWC's Facebook page had 47,000 followers at the time of data collection. It is mainly in Ukrainian and provides somewhat different data, featuring more reposts from news portals, various public Facebook pages and accounts and governmental websites. While it also allows for comments and reactions, it is notable that the posts rarely spark online debates and discussions.

The online materials from these platforms were analysed using qualitative content analysis (Bryman 2004) and link analysis. While the former was applied as both the research method and as an analytical tool with which to explore the thematic content of posts and entries, the latter focused on reposts and shared materials. Based on the elements of social network analysis, link analysis defines the UWC as a central node (Nguyen 2023) and examines dyadic relationships between its webpages and other groups and websites. It is aimed at providing insights into the broader online networks and dissemination strategies of the UWC. The qualitative analysis focused on the entries related to areas suggested by Laguerre (1999: 636): 'efforts to influence the homeland and reactions to state transformation, including instances of contested sovereignty' and those that signify 'critical junctures or events' (Koinova 2018a, b). This focus enabled the identification and analysis of 407 entries that matched these criteria. To those entries, deductive coding was applied to group them into moderate ('contained') or radical ('transgressive') modes of mobilisation (Koinova 2018a) and symbolic, political, organisational and procedural types of involvement with the homeland. The main body of data was collected in the spring of 2024, with some updates made in the spring of 2025. Relevant online materials encompassed not only contemporary posts but also those dated from 2010 onwards. This starting point was selected due to, arguably, a critical juncture – the election of Viktor Yanukovych as the President of Ukraine. Ethical approval (CMR/EC/II/2024) from the Ethical Committee of the Centre of Migration Research, University of Warsaw, was obtained before the data collection. The deployment of these research techniques has yielded the following insights.

The UWC's responses to critical junctures and events

The analysis reveals dynamic processes of repositioning by the UWC in response to critical junctures and events (Koinova 2018b). The identified junctures delineate 4 periods: increasing opposition to the Yanukovych regime from 2010 to 2013, followed by active support for the Euromaidan Revolution; mobilisation efforts aimed at protecting the homeland during the initial stage of the Russo–Ukrainian war (2014–2022); and an even greater mobilisation in response to the full-scale Russian invasion, during which the UWC made an extensive effort to amplify the official narratives of the Ukrainian state. It is evident that, during the first period, the UWC primarily demonstrated political, symbolic and organisational types of involvement, relying mainly on transnational channels. The Euromaidan was a critical juncture that set the UWC in complete opposition to the Yanukovych regime. This was followed by another critical juncture – the Russian aggression, with the elements of secessionist conflict. The UWC responded with initial active procedural involvement, followed by predominantly symbolic and, to a lesser extent, organisational involvement. The full-scale war constitutes another critical juncture, causing institutional change, the repositioning of the diasporic strategic centre and the greater integration of diasporas into the Ukrainian polity. This is due to the success of the campaign or ‘claim’ to recognise multiple citizenship. Symbolic and organisational types of involvement dominate during this ongoing period. These distinct periods illustrate nuanced repositioning and involvement strategies by the UWC and require a detailed discussion.

Non-violent conflict and anti-authoritarian efforts

A critical juncture marked the beginning of the period of non-violent conflict: the election of Viktor Yanukovych as President of Ukraine in 2010. The UWC was procedurally involved in these elections and acknowledged their fairness and transparency. The analysis suggests that, after the elections, the UWC tried to establish a rapport with the Yanukovych government, but these attempts were short-lived. At his first meeting with Yanukovych, the UWC President Eugene Czolij outlined the main concerns: the extension of lease agreement for the Russian military fleet in Crimea, the diversion from European integration, the elevation of Russian to the *de facto* second official language, the change in memory politics with the rehabilitation of Stalin, lesser attention paid to *Holodomor* commemoration and ‘unsubstantiated accusations of the Organisation of Ukrainian Nationalists led by Stepan Bandera’.² For the next 3 years, the symbolic involvement of the UWC was focused on these geopolitical concerns,³ a resistance to the use of Soviet symbols and the defence of a positive narrative on the OUN and UPA.

The UWC's organisational involvement was mainly related to attempts to block rather than implement specific policies. A critical event here was the elevation of the status of the Russian language. A new law by the ruling *Party of Regions* granted official status to the Russian language at the regional level. On 3 July 2012, despite the resistance of political opposition and diaspora organisations, the Ukrainian parliament passed this law. Not only the UWC itself but also its affiliated organisations worldwide expressed their profound disappointment. Despite numerous appeals, Yanukovych signed this law, further deepening the rift between the diaspora and the Ukrainian government. Link analysis shows that, in this period, the UWC actively shared critical posts by diaspora organisations worldwide. These developments suggest that diasporas had a limited impact on the state, primarily utilising transnational channels (Koinova 2018a). Furthermore, the UWC President Czolij repeatedly mentioned the issue of selective prosecution in Ukraine at various official events. Since the end of 2012, the intensifying tensions between the UWC and the increasingly authoritarian government have become

very pronounced. Throughout 2012 and 2013, the UWC released a barrage of statements criticising the Ukrainian state's political trajectory. Most notably, these included criticism of the raids by the Ukrainian tax police on the independent TV channel TVi⁴ and the imprisonment of opposition politicians.⁵

Despite an openly critical position towards Yanukovych and his ruling party, the UWC supported their campaign for European integration. For instance, in April 2013, the UWC hailed the pardon and release from prison of 2 opposition politicians. In its statement, the UWC framed this development as a positive step towards Ukraine's European integration.⁶ The hopes for European integration, however, were compromised by Yanukovych's refusal to sign a Ukraine–EU Association Agreement in November 2013.

Violent conflict and the Euromaidan Revolution

The UWC swiftly expressed its support for the Euromaidan protests and consistently condemned the efforts to suppress them. The brutal beating of the protesters in Kyiv on 30 November and 11 December seems to constitute critical events. It pertained to the switch from non-violent to violent conflict and resulted in the severing of ties between the UWC and the Ukrainian state. On 16 December 2013, the UWC issued its last direct address to Yanukovych, urging him not to sign the Customs Union Agreement with Russia:

*The UWC calls upon the governing authorities of Ukraine to act in accordance with the law of Ukraine on the principles of foreign and domestic policies and, listening to the will of the Ukrainian people, demonstrate, as quickly as possible, with concrete actions, the renewal of preparations for signing the EU–Ukraine Association Agreement instead of moving toward the Customs and Eurasian unions which constitutes a revival of the Soviet Union.*⁷

This address manifests an attempt to prevent Ukraine from falling into Russia's sphere of influence and also highlights a symbolic dimension related to the negative memory of the USSR. The cessation of direct communication between the UWC and the Ukrainian state was a dramatic repositioning of the former, as it moved into opposition to the regime. Over the next months, the UWC amplified the voices within its associated network of Euromaidan protests worldwide. Link analysis indicates constant reposts from the pages of the UWC's partner organisations as well as from news portals like the 'Voice of America'. It also expressed its frustration with the adoption of repressive legislation in January 2014. The so-called 'Dictatorship laws' were passed with blatant violations of parliamentary voting procedures. The adoption of these laws escalated violence in Kyiv and led to the death of 2 Euromaidan protesters.

In response, President Czołij called on the international community to impose individual sanctions on those responsible for 'the killing and kidnapping of Euromaidan activists, as well as brutal attacks and shooting on journalists and peaceful protesters'.⁸ While this call focused on sanctioning specific individuals, the escalation of violence eventually led to calls by the UWC to advocate for blanket sanctions against the 'Ukrainian governing authorities'.⁹ The harshening of rhetoric indicates a widening gap between the UWC and the kin-state. At the final stages of the Euromaidan protests, the UWC's priorities matched the inward goals described by Laguerre (1999) – the change of the government in the homeland. The collapse of the Yanukovych regime in February 2014 and the first signs of the Russian military aggression marked a new phase in the UWC's repositioning.

Resistance to the Russian aggression and secessionism (2014–2022)

The Russian occupation and annexation of Crimea and the subsequent war in Donbas constitute a case of contested sovereignty and, arguably, are a part of a critical juncture that caused a profound institutional change. At the initial stage of the conflict, the UWC actively defended the legitimacy of the Ukrainian state by immediately recognising Oleksandr Turchynov as the Acting President and calling on the international community to protect Ukrainian sovereignty.¹⁰ The UWC also showed procedural involvement, first in the presidential and then in the parliamentary elections. It increasingly relied on state-based channels (Koinova 2018a). This was coupled with efforts to bolster the activities of its affiliated organisations worldwide. On 22 March 2014, Czolij met with Turchynov in Kyiv and assured him of the UWC's support for the new Ukrainian government, congratulated him on the victory of the Euromaidan and voiced the hope that Ukraine would successfully resist Russian occupation.¹¹

In its articulated statements, the UWC framed the war in Donbas not as a secessionist conflict with self-proclaimed Luhansk and Donetsk republics but as an interstate one – the Russian aggression against Ukraine. Thus, its mobilisation was aimed at repelling external aggression. The separatist forces were addressed exclusively as 'armed Russian-backed provocateurs'. The UWC consistently framed the conflict as a universal threat to Europe and called for a United Nations peacekeeping mission to be deployed to Ukraine.¹² There is no evidence to suggest that the UWC presented the residents of Donbas or Russian-speakers as a threat to the state. Furthermore, since the occupation of Crimea, the UWC has consistently shown support for the Crimean Tatar minority.

The May 2014 presidential elections resulted in the unprecedented first-round victory of Petro Poroshenko. The UWC sent 230 monitors and declared the elections to be 'truly democratic'.¹³ Following this, Czolij personally congratulated Poroshenko on his victory. Shortly after the elections, Poroshenko met with the UWC leadership in Kyiv, pledging to strengthen ties with the 'Ukrainian overseas community'.¹⁴ During Poroshenko's presidency, the relationships between the Ukrainian state and the UWC markedly improved. This period witnessed a repositioning of the UWC, shifting from its opposition to the Yanukovych regime to a highly favourable stance towards the Poroshenko government. This latter even featured two diaspora returnees engaged in transition reforms: Ulana Suprun – serving as Health Minister and Natalie Jaresko, serving as Finance Minister. The opening of the UWC's permanent mission in Ukraine in 2015 is a significant indication of an institutional change and closer alignment between the kin-state and diasporas.

The 'Decommunisation laws' were created with direct diasporic involvement (Rudling 2024), thus encompassing symbolic and organisational involvement. Some academics raised concerns about these laws, suggesting that they might limit academic freedom and insufficiently accommodate the heritage of Ukraine's ethnic minorities (Marples 2018). The decommunisation policies, which resulted in the dismantling of Soviet-era monuments and the changing of Soviet-era toponyms across Ukraine, were evidently appreciated by the UWC.

Another crucial development hailed by the UWC was the establishment of an independent Orthodox Church. On 6 January 2019, the ceremony of Tomos of Autocephaly being granted by the Ecumenical Patriarch Bartholomew was attended by the new UWC President, Paul Grod.¹⁵ This event was branded as a milestone in Ukraine's history, stating that it 'returns Ukrainian Orthodoxy to its historic roots, restores historical justice and strengthens the dignity of all faithful in Ukraine'.¹⁶ Such appreciation comes from a greater autonomy and distancing from Russia. Another of the UWC's pronounced concerns was the protection and promotion of the Ukrainian language. Following the Euromaidan victory, the Yanukovych-era language law was annulled, creating a need for new legislation. A new law was adopted

in April 2019 – just 4 days after Poroshenko lost to Volodymyr Zelenskyy in the second round of the presidential elections. The UWC praised this development:

[in Ukrainian] *We congratulate all Ukrainians around the world with this historical decision – the adoption of the law ‘On the Provision of the Functioning of Ukrainian as the State Language’! The Ukrainian language is the symbol of our nation, all Ukrainians, irrespective of their place of residence. Our language unites us and binds us together!*¹⁷

After the law was adopted, the UWC regularly shared materials from the Facebook page of the Ukrainian State Language Protection Commissioner, a new government role. The Commissioner’s role is crucial for ensuring the efficient implementation and enforcement of the law. The UWC’s attention to this issue, evidenced by 28 such shared posts, underscores the significance of the Ukrainian language for it. Overall, symbolic involvement by the UWC dominated over other types during most of Poroshenko’s term in office. Notably, criticism of Poroshenko’s administration was virtually absent. This absence, considering Poroshenko’s mixed record on reforms, particularly in addressing corruption, can be attributed to 2 primary factors. First, the persistence of the UWC’s rationale, highlighted by Koinova (2009), where criticism from the diaspora was perceived as damaging for Ukraine. Arguably, this was even more the case in the face of escalating conflict with Russia. Second, although Poroshenko’s reform efforts were limited, he consistently pursued policies related to memory politics and national symbolism aligned with the priorities of the UWC. After the 2019 presidential and parliamentary elections, the UWC followed its established pattern in seeking constructive relationships with the new government. However, it expressed concerns that Zelenskyy would roll back symbolic policies and seek a rapprochement with Russia. For instance, the UWC criticised Zelenskyy’s idea of a referendum on a peace deal with Russia¹⁸ and defined concessions to Russia in the Minsk negotiations as ‘red lines’.¹⁹ Whether peace could be achieved through these negotiations is open to discussion; this stance of the UWC corresponds, at least partly, with the role of ‘peace-wrecker’ (Smith and Stares 2007). The UWC, however, supported a radical move by Zelenskyy to ban several openly pro-Russian TV channels, stating:

*The UWC does not consider this decision a violation of freedom of speech and freedom of expression in Ukraine. Amid the ongoing military aggression of the Russian Federation, it is critical to combat disinformation, propaganda and information on the war of the aggressor state against Ukraine. The UWC supports Ukraine’s efforts to counter Russian manipulations, fake news and influence in order to defend national sovereignty and security.*²⁰

In the period preceding the full-scale invasion, the UWC called for greater pressure on Russia and further democratic reforms in Ukraine. Its symbolic involvement focused on protecting previous achievements rather than introducing new initiatives. For instance, it issued several statements warning against the ‘russification of Ukraine’²¹ and called for more-active protection of the Ukrainian language. While the UWC continued to rely on state-based channels, its organisational and political types of involvement were limited in this period. Mobilising support for the homeland was at the centre of the UWC’s activities in the months before the full-scale invasion.

Effects of the full-scale Russian invasion

The full-scale war constitutes another critical juncture. While it caused a fundamental mobilisation of diasporas, the institutional change was somewhat delayed. In its attempts to prevent the invasion, the UWC organised rallies worldwide to showcase diasporic solidarity and support for the homeland. The UWC also commemorated the 'Heavenly Hundred' protesters who were killed during the final days of the Euromaidan Revolution, demonstrating symbolic involvement and underscoring their sacrifice for Ukraine's European and Euro-Atlantic future. The UWC's statements indicate the organisation's seriousness in anticipating the Russian invasion and its swift response to this critical juncture. On the day of the invasion, the UWC published an official statement, a section of which reads:

*The Ukrainian World Congress calls on the international community to stop the Kremlin's premeditated atrocious war against Ukraine, against Europe and against the international rules-based order. We urge all peace-loving nations to act with unity and resolve now and support Ukrainian peoples' right to statehood and independence.*²²

In the same statement, the UWC called for the disabling of the SWIFT payment system in Russia, providing more support for the Ukrainian army, removing Russia from international organisations and banning Russian ships from entering seaports. Following these appeals, the UWC engaged in numerous activities related to international advocacy for Ukraine. During the initial stage of the invasion, a significant portion of Congress' activities involved transnational channels and promoted participation in protests and marches worldwide. Photo reports often followed these events. Thus, the UWC served as an important element of diasporic mobilising structures (Koinova 2018a). Furthermore, President Grod provided numerous reports from meetings and summits where he advocated for the necessity of continued support for Ukraine. Another critical aspect of the UWC's repositioning in response to the full-scale invasion was the amplification of the voices of Ukrainian government officials. This was particularly evident in the frequent reposting of President Zelenskyy's daily video addresses across UWC's online platforms, which underscored solidarity with the leadership of Ukraine. Furthermore, the UWC displayed framing efforts, presenting the attack on Ukraine as an attack on democracy, Europe and the West. The UWC also framed the war as 'genocidal' after the atrocities in the town of Bucha were revealed. Even with such framing, the UWC has not employed radical rhetoric or gone beyond the calls to defend Ukraine.

Before discussing the UWC campaign for the recognition of multiple citizenship, it is essential to address the highly damaging situation. During an unannounced visit by President Zelenskyy to Canada on 22 September 2023, an incident at the Canadian Parliament sparked widespread controversy. Speaker Anthony Rota acknowledged the service of Jaroslav Hunka, a Ukrainian veteran of WWII, prompting a standing ovation from those present. It was quickly revealed that Hunka had served in the Ukrainian Waffen SS division during the war, leading to a scandal and Rota's subsequent resignation. This incident was quickly exploited by Russian propaganda to help its portrayal of Ukrainians as Nazis. As was pointed out earlier, the UWC always placed symbolic involvement high on its list of priorities. However, this time, the UWC did not issue any official statement on this situation or try to reframe it. This silence was met with criticism, as commentators on its Facebook page openly questioned the lack of response. Apparently, it was decided not to engage in public debates on this issue. Only in January 2024 did the UWC share a booklet by a Ukrainian-Canadian scholar, Lubomyr Luciuk, *The Galicia Division: They Fought for Ukraine*.²³ This publication denied that its soldiers embraced Nazi ideology and

stressed that charges of war crimes were never substantiated. The promotion of this booklet served as an indirect response of the UWC to the scandal. Having pointed this out, it is necessary to address Congress' broader efforts to make diasporic political participation more substantive.

Campaign for multiple citizenship recognition and institutional change

The campaign for the recognition of multiple citizenship has been a long-standing priority for Ukrainian diasporas. In the early 2000s, Satzewich (2002) noted that the desire of diasporic subjects in Canada to obtain Ukrainian citizenship primarily had symbolic drivers. Arguably, such a symbolic dimension may manifest some form of 'return' to the homeland (Safran 1991). However, behind this symbolic dimension, obtaining Ukrainian citizenship has practical aspects such as full rights to participate in the homeland's polity. Previously, this recognition had faced resistance from the Ukrainian state, largely due to Russia's expansive approach and granting citizenship in breakaway territories like Transnistria, South Ossetia and Abkhazia. The Russian law allowed individuals with vague connections to the former USSR or Russian Empire to apply for Russian citizenship (Shevel 2010). In light of this, the Ukrainian authorities have been reluctant to recognise multiple citizenship, fearing that Russia might use it to assert political influence over Ukraine.

Many aspects related to multiple citizenship remained unregulated. While those with multiple citizenships were not supposed to take up governmental jobs, this was often not adhered to. The UWC and other diaspora organisations have argued that appropriate legislation should be developed to provide effective mechanisms. Representatives of the UWC stressed that this would enable Ukrainians from Western diasporas to participate in Ukraine's political processes and contribute to its democratic development. Despite the UWC's persistent efforts, progress on this issue has been slow. The election of Zelenskyy has positively changed the situation. After just 1 month in office, he met with the UWC leadership and encouraged the organisation's participation in drafting the law on multiple citizenship.²⁴ In numerous statements, the UWC stressed that it has provided detailed recommendations for this law, recommendations which suggested signing bilateral agreements on citizenship recognition with Western countries that host Ukrainian diasporas. This approach, the UWC argued, would safeguard Ukraine from the risk of Russian interference by explicitly excluding Russia from such agreements.

In December 2019, a Draft Law No. 2590 'On amendments to certain laws of Ukraine on citizenship' was submitted to the Ukrainian parliament. It fell short of recognising multiple citizenship and was criticised by the UWC as not adequately protecting '(...) the rights of the diaspora representatives and further engage the global Ukrainian community in developing Ukraine'.²⁵ Zelenskyy (2021) reiterated his commitment to making diasporic subjects full members of the Ukrainian polity in his address to the Ukrainian Parliament:

[in Ukrainian] I know how important the question of multiple citizenship is for Ukrainians who live in the US, in Canada, in the EU. I will submit a draft of the appropriate law to parliament today. There are 65 million of us. For the first time, Ukrainians from around the world will feel themselves not as a diaspora, not just as people of Ukrainian heritage but as Ukrainian citizens with equal rights.

This statement was made shortly before the full-scale invasion that disrupted but did not stop the work on the legislation. After its beginning, the UWC urged the Ukrainian authorities to lift the restriction preventing foreign nationals to take up governmental jobs, in order that diasporic subjects can do more for their homeland. In 2024, the discussion of the law was renewed with the UWC President stressing:

[in Ukrainian] *When we feel like strangers in our own country, without the right to citizenship, it distinguishes Ukrainians living abroad from those living in Ukraine. Today, the world has become significantly more global and we see how many Ukrainians now reside beyond Ukraine's borders – creating all the conditions for us to work and feel like one Ukrainian nation is crucial. Citizenship is a key to that* (Grod 2024).

The UWC constantly emphasised the potential role of diasporas both in repelling the Russian aggression and in their potential for post-war reconstruction. Ukrainian citizenship, however, comes not only with rights but with duties such as military service. In December 2024, the Ukrainian parliament passed Law No. 11469 in the first reading and, after intensive work, passed it on 18 June 2025. The President signed it the following month. The UWC stated:

*The timing of the signing – on 15 July, Ukraine's Day of Statehood – is highly symbolic. With this step, Ukraine reaffirms its commitment to all who identify as Ukrainian – regardless of where they live – and welcomes them as active members of the global Ukrainian nation.*²⁶

This quote shows the perception of this law as changing not only the Ukrainian polity but also redefining the mere sense of the Ukrainian national belonging worldwide. Adamson and Demetriou (2007) describe such encouragement by states for diasporas to obtain citizenship as pragmatic. Thus, it is possible to assume that the progress made in the multiple citizenship domain is driven by the greater dependence of the Ukrainian state on its diaspora, hopes for diasporic returnees and a positive role in post-war reconstruction. These institutional changes show both mutual interest and a closer alignment between diasporas and the kin-state.

Conclusions

This paper has investigated changing diasporic relationships with the homeland in the context of escalating conflict by focusing on the leading Ukrainian diasporic organisation. The concepts of critical junctures and events provide an essential conceptual framework for the understanding of the analysed repositioning, modes of mobilisation and changing types of diasporic involvement. With its activities and claim-making, the UWC demonstrated consistency in its support of the European and Euro-Atlantic integration of Ukraine. The repositioning processes analysed in this paper's 15-year period highlight the changes in stance and claims by the UWC in its reactions to critical junctures and events (Koinova 2018b). The election of Yanukovich marked a critical juncture, prompting the UWC to rely on transnational rather than state-based channels, which eventually led to a stark opposition to the government of the kin-state. Its dedication to the symbolic involvement demonstrates its efforts to reshape or protect elements of an 'imagined community' which it deemed crucial.

Another critical juncture was the shift from non-violent to violent conflict at the beginning of the Euromaidan Revolution. The victory of the revolution and the subsequent Russian aggression constitute another critical juncture that has led to the repositioning of this leading diasporic organisation, with its 'strategic centre' partly moving to Ukraine. The establishment of the permanent mission is a key organisational development. The UWC helped to restore the legitimacy of the Ukrainian state with a procedural involvement. It refrained from criticising the slow pace of reforms or the persistence of corruption with an apparent intent not to undermine the state in the face of external aggression. Notably, it never recognised the secessionist traits of the conflict, framing it exclusively in interstate terms.

While not exhibiting levels of radicalisation comparable to those in some other cases of diasporic mobilisation (Beaugrand and Geisser 2016; Koinova 2018a, b; Smith and Stares 2007), the UWC supported restrictive legislation like the 'Decommunisation laws'. The UWC's cautious approach to the initiatives by President Zelenskyy and efforts to avoid, in its view, 'peace at any price' characterises it to some extent as a 'peace-wrecker'. Ultimately, the full-scale war has not made the UWC adopt radicalism. Despite the existential threat to its homeland, the UWC consistently practised contained politics. Finally, this study clearly indicates the UWC's willingness to enable diasporic subjects to participate more widely in political processes in Ukraine – the adoption of the law on multiple citizenship makes this possible. As current research indicates, Ukraine moved closer to integrating diasporas into its polity. This, if not entirely, can be attributed to the critical juncture of the full-scale war. However, the actual effects of this institutional change are something for future research to consider.

It is necessary to acknowledge the limitations of this study related to its methodology and to point out directions of possible investigation. While the UWC's online representation provides a sufficient basis for investigating its claims and stances, adding other data-collection techniques, such as interviews or participant observation, may expand our understanding of the rationale and context behind the organisational 'facade'. Moreover, future research can consider how the factors related to sociospatial positionality (Koinova 2018a) address how proximity to institutions, networks and resources shapes the mobilisation of the UWC and other Ukrainian diasporic organisations and groups. Finally, the effects of the grassroots dynamics within the UWC's networks constitute an important research topic. While much depends on the outcomes of the ongoing war, we may ask: Are we witnessing the emergence of a fundamentally new global Ukrainian nation? This is what future research definitely should consider.

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Conflict of interest statement

No conflict of interest was reported by the author.

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Notes

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— SPECIAL SECTION TWO —

Introduction: Informational Autocracy and the Moral Panic Button – Using Migration Discourse as Manipulation at Master Level

Miklós Rosta*, Endre Sik**

The articles in the special section concentrate on a particular form of governance (informational autocracy) and on its core technology to acquire hegemony for the ruling power over political communication (the moral panic button). The example is Hungary; Poland serves as a point of reference, and the Russian war against Ukraine provides the conditions of a natural experiment. The case studies demonstrate that the primary topic of MPB is migration as the ultimate threat, and how those actors accused of creating, maintaining, and using the migration flow to destroy the sovereignty of the Hungarian state are used as scapegoats.

Keywords: informational autocracy, moral panic button, Hungary, Poland, NLP, manipulation

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The 5 articles in the special section make for interesting reading for those who want to understand in more depth how a government manipulates public discourse to maintain its power. The example is Hungary; Poland serves as point of reference, and the Russian war against Ukraine provides the conditions of a natural experiment. This type of governance is called information autocracy (IA, Guriev and Treisman, 2019). The technology which the Hungarian government applies as the backbone of maintaining this modern form of autocracy is the so-called moral panic button (MPB). The essence of this opportunistic tool is to send signals to broad sections of society through the conscious manipulation of information to which citizens unconsciously respond and fear. Fear- and crisis-mongering and the generation of an image of the enemy (more precisely a circle of enemies) help the authorities to rally the population to a strong-handed, competent leader, i.e. a type of charismatic father figure. The 5 case studies also demonstrate that the prime topic of MPB is migration as the ultimate threat and those persons and organisations that create, maintain and use the migration flow to destroy the sovereignty of the Hungarian state diminish the Hungarian nation. Various and flexible forms of ideological messages are also applied by the MPB, i.e. this model can be conceptualised as the original IA theory.

The 5 articles of the special section apply various empirical exercises to illustrate the technology of MBP as a key element of the IA toolkit. Most of the research focuses on media representations and applies different types of text analysis. The lesson is that the Orbán government is a master of manipulation. Though it has not produced completely new techniques (except perhaps the specially designed form of push poll – the so-called ‘national consultation’). It is now a truism that the primary goal of the Orbán government is to hold on to power at all costs (see Kornai 2015, 2016). The adaptability of the information autocracy is a particularly fascinating issue: it reacts differently to the diverse migration situations (2015 and 2022), each in a way that reinforces the image it paints, which does not fully correspond to reality.

The way in which migration-related discourse is used by IA is as part of its post-truth ideological practice, which is lucidly shown by Rakovics and Boda’s (2025) article in this section. This technique fits well with the general operational rules of the Hungarian version of IA. For example, while Orbán describes Hungary as a Christian conservative state¹ and one of its major themes is ‘to defend the children’ from the woke ideology (and recently forbade the annual Pride street demonstration to be held), in recent times, Christian churches in Hungary have been shaken by serious crises that have led to a major crisis of confidence.²

Although Fidesz is losing strength and a new opposition led by Péter Magyar, a former Fidesz party *cadre* is on the rise, Fidesz is still the strongest party and Hungarians still consider Viktor Orbán to be the most competent leader. In each case, the government propaganda machine has handled these crises professionally and minimised the damage, distancing Orbán from the Fidesz *cadres* who have committed the ‘crimes’. Moreover, Trump’s winning presidency and the growing visibility of the right-wing political parties in the EU parliament strengthen the image of Orbán as an influential international actor of radical conservative thought.

The MPB has been used very often and effectively by the Orbán administration in recent years, partly because the opposition was unable to reach out to the broader sections of society and explain clearly why the government’s claims were false and untrue. For the first time in its history, the Hungarian government faced a new and powerful opposition actor in the 2024 municipal and European Parliament elections, with a voice that reached a much wider audience than the previous opposition. The exciting question is whether the MPB can be used effectively in this new political space. Public opinion polls in autumn 2024 and early 2025 show that the propaganda machine led by the headquarters of the MPB organisation within the Prime Minister’s Office lost its initiative once it failed to dominate the communication space and was forced to react to topics not created by themselves. The most recent

national consultation on the new economic policy ('economic neutrality') has barely affected public discourse and the response rate has remained relatively low.³

The strength of the special section is that, in addition to the Hungarian example, it also analyses the former Polish government's communication on migration. While, in the minds of the public, the two countries wore the same hat – i.e. both can be described as information autocracies – the volume clearly shows that Polish society had a significantly different approach to migration and the government itself framed the migration crisis in a different way, so that the rejection of refugees and xenophobia were much less characteristic of them. The comparison between the Polish and the Hungarian examples is particularly relevant now that the Kaczynski government, previously characterised by genuinely autocratic tendencies, has been replaced by a government trying to bring back the basic institutions and *modus operandi* of liberal democracy.

The direction of research that the editors and authors of this volume set out will be fruitful in the long run, because it is an approach that is particularly useful in the field of political science and political economy. It is important to see that the selection of information, the way it is transmitted and the production of content measured in a pharmacy balance is crucial in the case of non-democratic and non-totalitarian regimes and, therefore, the phenomena studied in this special section may be of interest to a wide range of researchers focusing on de-democratisation.

In the course of de-democratisation, it is crucial for the leaders of IAs to fight to maintain their popularity since, if this declines, they cannot maintain their power and the political system either moves back to democracy or slides into the historically familiar dictatorial regimes. The articles highlight how Viktor Orbán has been able to maintain his popularity since 2010 with the help of the MPB. It can be seen that he has always used the tools of the MPB and enemy-building in a highly ingenious way. This is quite an achievement, as Orbán's idols, Putin and Erdogan, have been unable to maintain their system of information autocracy and have become old-style dictators in recent years. Russia and Turkey are now characterised by total censorship and the imprisonment or even murder of dissidents; just think how often dissidents are thrown out of their windows in Russia or how many judges and university professors in Turkey have been imprisoned for their political opinions in recent years.

In addition to the dropout, another process can also be observed, namely the expansion of information autocracies worldwide (Northern Macedonia, Georgia, Serbia). This is no coincidence since Viktor Orbán is devoting considerable resources to employing the tools he has perfected in Hungary to make information autocracies sustainable and the institutional framework of the political system an international model. Hungary is happy to share its experience in building the system with new types of autocratic leaders, not only by sharing knowledge but often by providing financial support for the implementation of individual steps (think of the support for former Slovenian Prime Minister Janša or the Georgian Prime Minister Irakli Kobakhidze, who drew international attention for his use of brute force against young people protesting against him after his questionable election victory in October 2024). Hungary is also open to providing sanctuary to failed leaders in information autocracies who should be held accountable for their actions before the justice system; see Nikola Gruevski, former Prime Minister of North Macedonia or Polish Deputy Minister Marcin Romanowski. The Hungarian government has been extremely active in promoting MPB in the region. It supported its allies in Poland and Slovakia in introducing MPB but also intervened in other ways alongside its allies. For example, it provided a loan through an oligarch's bank for Le Pen's election campaign, interfered in Bosnia and Herzegovina's highly sensitive domestic political processes in support of its allied Serb leader and even sheltered the ousted Brazilian president at the Hungarian embassy for several days when needed.⁴

The research findings of this special section are not only important for our region – although their paramount importance here is unquestionable – but may also be of interest in Western Europe and even in the United States of America. The impact of messages that are entirely divorced from reality on voter behaviour has become a focus of social science around the world due to the populist turn, from the return of Trump as President of the US to the rise of Le Pen in France and to the continued rise of the AfD in Germany. The Hungarian Prime Minister and his colleagues are regular guests, even star guests, at the Conservative Political Action Conference (CPAC), while the Patriots for Europe group in the European Parliament has many radical right-wing parties from Western Europe among its ranks (with members from Austria, Denmark, Belgium, France, Italy, Portugal, the Netherlands, Spain and France). The German AfD is expected to join them soon. All this shows that the information autocracies are engaged in conscious and systematic international networking. These extremist parties are growing in strength and have already come close to political power in several Western European countries, so it is crucial to understand how the Orbán regime, which is the longest-standing ruling power in the European Union and one of the dominant organisations of the European far-right parties, maintains its power. Trump's recent efforts to abolish checks and balances in the US are also in line with de-democratisation processes.

Migration, to which the empirical research in this special section applies the theoretical framework, is part of the core CPAC discourse 'No migration! No war! No gender' (for the details see Sik and Krekó 2025, in this section). There is nothing new in treating migration as a threat (Wimmer and Glick Schiller 2002) and the serious consequences of doing it in contemporary societies have been pointed out by many (Benczes and Ságvári 2022; Castles 2004) but the political benefits and ways in which information autocracies do so are particularly intriguing. The special section suggests that, although the Polish and Hungarian cases differ significantly (as the differing trends of their discourse as a reaction to the mass migration after the beginning of the Russian–Ukrainian war show, still the migration issue is and remains a core element of every ongoing political propaganda. Surányi and Bognár (2025, in this section) illustrate how the Hungarian government's migration discourse has changed as a reaction to the coming of Ukrainian war refugees – i.e. without changing explicitly their main anti-migration narrative but adding to it the aspect of deservingness. Varga, Rakovics and Sik (2025, in this section) show the changes of the pro- and non-government narratives focusing on the labelling techniques (i.e. 'migrant' versus 'refugee'). Finally, Surányi and Sik (2025, in this section) demonstrate the different trends of the level of xenophobia in Poland and Hungary in the aftermath of the Russian–Ukrainian war, mostly due to the impact of the Hungarian anti-migrant propaganda.

Notes

1. Máté-Tóth and Rakovics (2023) show how the meaning of Christianity has changed in Orbán's speeches. They claim that Orbán's concept of Christianity is part of the permanent re-creation of the concept 'nation': 'The political emphasis on Christianity is related to the wounded collective identity of Hungarian society. The paper argues that, because of the collective woundedness, society requires an overarching narrative symbolising unity, of which Christianity is a key concept' (2023: 1).
2. For example, the case of the paedophile supporter who was pardoned by the former President of the Republic, Katalin Novák, for which Bishop Zoltán Balog, a former Orbán government minister, lobbied. Another example is the participation of a government-supported priest (Father Gergő Bese) in gay sex orgies or the case of József Szájer (a former EU representative of Hungary), who drafted a constitution embodying strongly conservative values, who left a gay sex orgy in Brussels during Covid with drugs in his backpack.

3. According to the research, 82 per cent of pro-government voters, 32 per cent of undecided voters and only 6 per cent of opposition supporters returned the questionnaire – overall, one-third of the respondents participated in previous consultations, 90 per cent of Fidesz-KDNP supporters, 47 per cent of undecided voters and 17 per cent of opposition voters answered the government's questions, resulting in an overall participation rate of 46 per cent. The higher-than-usual disinterest this time may have been due to the fact that, despite the government's propaganda campaign, only 45 per cent of respondents knew what the current national consultation was about, 15 per cent identified the wrong topic, while 40 per cent either did not know or did not answer. Nevertheless, as the survey showed, some people still filled out the questionnaire despite their lack of awareness (https://nepszava.hu/3179351_nemzeti-konzultacio-publicus-intezet-felmeres-orban-kormany).
4. Poland: <https://444.hu/2023/08/14/terjed-a-magyar-innovacio-a-lengyel-kormany-is-kamuk-erdesekrol-tartana-nepszavazast-a-valasztassal-egy-napon>, Slovakia: <https://444.hu/2023/12/08/szlovakiaban-is-futtatta-a-nyomaszto-videoit-a-magyar-kormany-a-valasztasi-kampanyban>.

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Hungary as an Ideological Informational Autocracy (IA) and the Moral Panic Button (MPB) as Its Basic Institution

Endre Sik*, Péter Krekó**

In this paper, we analyse the production, circulation and operation of narratives and the frames and themes of migration discourse through a case study in a bid to understand the role which the moral panic button (MPB) plays in creating simultaneous crisis- and fear-mongering campaigns against enemies (in our case, with the Soros phenomenon at the core) that are declared to be an existential threat to the 'Nation'. We argue that the creation and fine-tuning of the MPB is a crucial aspect of building the Hungarian version of informational autocracy (IA), i.e., a non-democratic regime in which the capture of the media and professional control of information are the central elements of the de-democratisation process and of maintaining in executive power.

Keywords: moral panic button, informational autocracy, Soros phenomenon, migration discourse, fearmongering

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Introduction

In this paper, we analyse the production and circulation of migration-related discourse, the operation of the moral panic button (MPB). This is the Hungarian government's institutionalised way of creating crisis- and fear-mongering campaigns against enemies that are declared to be an existential threat to the 'Nation', continuously. We argue that the creation and fine-tuning of the MPB is a crucial aspect of building the Hungarian version of informational autocracy (IA) – i.e. an autocratic regime in which the capture of the media and professional control of the information are the central elements of the de-democratisation process.

To explore how the MBP operates in practice, we employ both visual and discourse analysis following a traditional qualitative research approach. Specifically, we deconstructed the intended messages of the push-polls questionnaires and campaigns by systematically reading and viewing all of them between 2015 and 2024. Consequently, our analysis is not based on sampling but encompasses the entire corpus. This paper is organised as follows: in the first 2 sections we briefly introduce the concept of informational autocracy and the main characteristics of the moral panic button (MPB). In the next section we analyse the details of the operation of the MPB using the migration discourse, first to achieve its crisis-/fear-mongering goals and, second, to convince people that only the Fidesz-led government can save them from these dangers.

The informational autocracy

In previous years, Hungary has become a clear-cut example of de-democratisation. The most-often-emphasised elements of this process are political polarisation, the manipulation of the electoral system to the advantage of the ruling party and the domination of communication processes.

To illustrate how important the manipulation of information may be in the maintenance of power by contemporary rulers, we cite the authors of the concept of 'informational autocracy' or 'spin dictatorship':

(...) In the Peru of Alberto Fujimori, the Hungary of Viktor Orban, and the Russia of Vladimir Putin, illiberal leaders have managed to remove almost all constraints on their power while using relatively little repression and pretending to be democratic (...) their secret lies in the control of information. Instead of isolating their countries, imposing ideologies, or terrorizing citizens, such leaders achieve many of the same ends by manipulating public opinion. With the help of censored or co-opted media, they persuade citizens that they are competent and benevolent; their legitimacy rests on popularity rather than fear. (...) Instead of trying to reprogram people's thinking with a comprehensive ideology, they aim only to improve evaluations of their leadership (Gurieva and Treisman 2020: 1).

This is how the authors characterise 'spin dictators'¹ who are not hard-core dictators who rule using open repression and violence:

(...) They wear expensive suits and send their kids to college in the West. They claim to be democratic and hold elections. They allow some opposition media, so long as its audience remains small. They monopolise power like the old dictators, eliminating any effective checks and balances but they do so with much less violence. They do it rather by manipulating information – co-opting the media and presenting a distorted version of reality. Instead of terrorizing people, they fool them (Treisman 2022).

According to the original concept (Guriev and Treisman 2020), there are 4 main characteristics of informational autocracies (or 'spin dictatorships'): (1) the low level of violence applied against political opponents, (2) mimicking democracy, (3) relying on public support among the lower classes and the less-educated and much less on the elites and (4) an emphasis on competence over ideology. Informational autocracies are lookalike democracies where a professionally and continuously manipulated public opinion is relevant to the fear- or crisis-mongering power game.

The first 3 abovementioned criteria of informational autocracies apply well to Hungary (for a detailed analysis, see Krekó 2022). At the same time, the analysis of the operation of the Hungarian version challenges the fourth feature of informational autocracies. The either/or approach of competence/professionalism versus ideology-based governance seems to oversimplify the picture. The Hungarian version of informational autocracy (IA), while emphasising the competence of the government, uses various ideological narratives extensively and intensively, both domestically and internationally (Enyedi 2023; Krekó and Enyedi 2018) to create and maintain moral panics, stir moral emotions, and sustain legitimacy. This political strategy must be based on strongly defined ideological positions: to fuel moral panics, you need a clearly defined set of moral values.

This extension of the original concept of IA is crucial for our approach since it emphasises the role of ideological propaganda as the key element of governance – i.e. the role of artificially created moral panics as the means of dominating the informational and moral spheres of autocratic rule. The Hungarian IA operates using an almost unlimited budget and organisational capacity. During political campaigns, public spending runs particularly high: only in March 2022 (in the month preceding the 2022 general elections), the government, the ruling party and its proxies spent more than 8 million EUR only on public billboards – 8 times as much as the opposition parties spent together.² The narratives that are produced and circulated are construed of a mix of standard frames and scapegoats which – if necessary – are updated and tailored to the changing political climate while using ideological elements as well (e.g. referenda and campaigns against gender propaganda and LGBTQ) as well as stressing both the competence of the government and the charismatic features of Orbán (Polyák 2019).

Enyedi (2023) argues that the Orbán regime has always used strong ideological positions to establish its power, mixing the following ideological elements³:

- illiberal conservatism, which 'promotes traditional family structures, social order and religious (Christian) legacies (...)' (p. 12);
- civilisationist ethnocentrism, which 'combines the anti-globalist idea of national sovereignty with loyalty to the circle of white Christian countries that are ready to defend themselves against migration and cosmopolitan discourse' (p. 13); and
- paternalist populism. The central principles of liberal democracy, like checks and balances, state that neutrality, individual rights and non-discrimination are of no value to this 'father-figure-led' form of populism (p. 13).

The fact that Fidesz, since the 2010 national election, has come to dominate Hungarian politics and has already repeated its landslide victory 4 times, proves that the MPB as well as the dismantling of the democratic checks and balances, works (Kis 2019; Orosz, Faragó, Paskuj and Krekó 2022). A key element of the success of the Fidesz government is that it has managed to convince a substantial part of the population (about one-third of potential voters, which – because of the carefully crafted election system – is enough to obtain a two-thirds majority in parliament) that they are the only competent and public-spirited political alternative which can bring security, stability and wealth to the 'People' as well as defend the country's sovereignty and morality.

The operation of the MPB

The concept of the MPB heavily draws on the theory of moral panic developed by Stanley Cohen (2011[1972]). A moral panic should focus on a seemingly life-or-death threat and may have serious and lasting negative effects on society. It has to involve a person or group of wrongdoer(s) who can be blamed. The moral panic often involves specific language. For example, asylum-seekers are often described using metaphors involving water (floods or waves) or depicted as an invading army. As to the origin of the moral panic, it can be bottom-up – when rumour and gossip initiate and widen the concerns of a local problem – or the result of an idea that trickles down from the elite through the media. Opinion leaders of all sorts (editors, politicians, ‘moral entrepreneurs’, so-called ‘right-thinking people’) use these channels to diagnose the problem and to offer the remedy.

The MPB, however, is not a simple top-down version of a moral panic but a unique propaganda machine by which the Hungarian government continuously creates crisis- and fear-mongering campaigns against artificially created scapegoats that are accused of committing various malevolent actions against the “Nation” The MPB has been successful in strengthening the worldview which the government prefers, enhancing polarisation and exploiting fears. Therefore, it is the core element of the toolkit of the Hungarian version of IA. Of course, the Hungarian informational autocracy does not operate in an international vacuum but combines persuasion techniques and ideological elements imported from Western, democratic and Eastern, autocratic political systems.

A crucial component of an informational autocracy is its hegemony over the media. When the regime felt strong enough to consolidate its power, immediately after its first win, it changed the legal environment. After the second landslide victory, the government started to close or convert critical non-government media outlets (Polyák 2019). Later, the Central and Eastern European Media Foundation was established on the basis of a pro-government entrepreneur’s donation of their media assets to the foundation, which now owns hundreds of media outlets – over 470 (Bátorfy and Urbán, 2020) – and controls the whole system of county newspapers, providing centralised political content (Kovács, Polyák and Urbán 2021). The next step was the strategic redistribution of state advertising funds, which resulted in a flourishing pro-government and a struggling non-government segment. Around the early 2020s, 80 per cent of advertising revenue went to pro-government media outlets (Kovács *et al.* 2021). With the strategic distribution of state advertising, the pro-government media is flourishing, while the critical media is struggling to survive.⁴ As the final step in controlling the media, Fidesz turned its attention towards social media. As a result, a network of influencers and political commentators was built who use their own social media accounts to mediate centrally composed messages on various social media platforms (mainly Facebook).⁵

However, the hegemony of the government in the media is necessary but insufficient to achieve the ultimate aim: control over the attitudes of the targeted part of the population. The chart of the ‘history’ of the MPB (Annexes 1 and 2) shows that, since 2015, there have been 14 ‘pressings’ of the MPB (see the Roman numerals in the top segment of the chart), of which 5 were referenda and elections (Annex 1 – II, V, VII, XII and XIII) and the other 9 so-called ‘national consultations’⁶ – push-polls using manipulative questions filled out dominantly by the committed supporters of the regime to show that the ‘majority’ is behind the government.⁷ Through these 14 pressings of the MPB, propaganda has created moral panics directly for the entire population – even those who never read or watch the media are reached by the letters sent to every household with a member who is eligible to vote and everyone is exposed to the billboards.

The above-mentioned pressings were embedded into various media campaigns (see the Arabic numerals in the lower segment of Annex 1 and the second picture in Annex 2) which precede and follow

the pushing of the MPB and reinforce their messages. The essence of this propaganda technology is nothing new: crisis-/fear-mongering – i.e., attempts to increase the number of sympathisers and to mobilise them as voters by generating a sense of threat through providing them with the enemy(ies) and theme(s). In short, it is to create a herd of tamed and disciplined Fidesz believers and devoted followers of Orbán, the charismatic leader.

The foundation of the MPB involves a mix of think-tanks and government departments led by a core group of experts and politicians at the Prime Minister's Office; its propaganda machinery flexibly mixes fake, doctored and manipulated news. It also professionally tailors the combinations of various narratives and scapegoats to reach all social strata while applying simple messages in a highly repetitive and monotonous manner.

The 'history' of the MPB in Hungary started in early January 2015 during the aftermath of the Charlie Hebdo terror attack. On 11 January, the Prime Minister talked about the increasing threat which terrorism poses to Europeans' everyday lives and expressed his commitment to fighting this threat, stating that political correctness and the sclerotic EU are hindering the proper defence of Europe.

Soon, the spin doctors in the Prime Minister's Office discovered that the government's previously declining popularity had started to rise. The threat of migration combined with terrorism became the basis of further moral panics.⁸ The 'history' of the MPB shows that migration was the core theme selected for crisis- and fear-mongering in 2015 (Annex 1: I, 1 and 2) and has remained a core theme throughout the entire period. There were, however, different phases when the pressings were refreshed and extended by adding new themes and scapegoats:

- In 2016/2017, the anti-migration campaign was reinforced by an anti-EU referendum (Annex 1: II, 3 and 4) by introducing Soros as a 'grey eminence' in the background and introducing a new propaganda technique – flash news embedded into coverage of major sports events (Annex 1: 5).
- In 2017 Soros was in focus but migration was not forgotten either (the relocation quota – i.e. migrants plus the EU – Annex 1: III and IV and 6).
- 2018/2019 – the first election phase was peppered with pro-family and anti-UN propaganda while making sure that all these messages contained anti-Soros narratives as well (including Soros, as an octopus and the anti-CEU activities – Annex 1: V, VI, VII, 7–11).
- 2020/2021 was the COVID phase (Annex 1: VIII, X, XI and 12).⁹
- 2022/2023 – the election campaign combined 2 seemingly unrelated issues (child protection and sovereignty) and used the 'classic' enemy images (Soros and the EU) (Annex 1: XII–XIV, 15).¹⁰

Annex 1 does not contain the national consultations in 2024 and 2025. The first one focused on sovereignty, with the EU as the main scapegoat.¹¹ Various topics were deployed to prove the so-called 'anti-Hungarian' sentiment of the EU, which is manifested through reducing the sovereignty of Hungary and blocking the fight of the Hungarian government (the spearhead of the international patriotic movement) against war, LGBTQ and migration. The second national consultation used the EU and multinational firms as scapegoats and combined the 'classic' topics (migration, family and war) with the concrete plans of the Hungarian government in the coming years to kick-off the campaign to win the next election in 2026.¹² Annex 2 shows that the MPB declared the main theme of the next parliamentary election in 2026, i.e. a new combination of scapegoats: Ukraine and the EU leaders, Zelensky and the leader of the main opposition party Péter Magyar).

resorting to spreading conspiracy theories and misinformation with the aim of influencing the public's perception of socio-political issues (Boese, Lundstedt, Morrison, Sato and Lindberg 2022).

The perceptions of threats to national sovereignty have also been exacerbated by the gradual inclusion of the region's states into supranational organisations, which may also have contributed to the population experiencing a sense of political impotence (Gerő, Plucienniczak, Kluknavska, Navratil and Kanellopoulos 2017). Thus, Soros was an appropriate figure onto which fears resulting from the integration into global political structures could be projected.

The Soros phenomenon (George Soros himself, his network, his foundations – especially the CEU – and, recently, his son, Alex) has been targeted by the MPB as the core scapegoat from the very beginning and is still an element of it.¹⁷ This can be demonstrated lucidly by the visual presentation of George Soros himself. In Figure 1, we show the pictures that were used in the course of various MPB pressings between 2016 and 2024.

Figure 1. The visualisation of the Soros phenomenon*



* First row from left to right – 2017 (Annex 1: III and 6), 2018 (Annex 1: 8). Second row from left to right – 2019 (Annex 1: 9), 2021 (Annex 1: X), 2022), 2023 (Annex 1: 15).

Source: Compilation by the authors.

In 2017, the MPB found an article written by Soros that it used as the pretext for moral panic. Its essence was that Soros plans to import millions of migrants and, through this, 'endangers the culture of Christianity in Europe' (upper-left hand and Annex 1: III) and therefore has to be stopped. The traffic sign was invented (and in the same year used against the EU, Annex 1: IV) to send the message that the government is ready to fight. This pressing was embedded into an anti-Soros media campaign (upper-middle picture and Annex 1: 6). In this campaign, Soros was pictured as the Enemy laughing at the People.¹⁸

Since then, Soros has been portrayed as the mastermind hidden behind the scenes several times, for example:

- in the parliamentary election in 2018 (upper-right and Annex 1: 8), embracing the then-leaders of the Hungarian opposition parties (with cable-cutters in their hands and the message 'They want to demolish the border fence together' – i.e. let mass migration continue);

- in the lower-left picture, where we see 2 laughing men, Soros (again in the background) and Jean-Claude Juncker, former president of the European Commission, during the EU election in 2019 (Annex 1: 9). The message says: 'WHAT DOES BRUSSELS WANT TO DO? You have a right to know what Brussels is planning! They want to implement the mandatory settlement quota. They want to weaken member-states' rights to control their borders. They want to facilitate immigration with a migrant visa';
- the emoji (next to the lower-left picture) portrays Soros as an enraged bull, saying: 'Soros is again ready to attack us';¹⁹
- the picture (lower-second on the right) shows Soros hiding (and still laughing) behind the 'Brussels' sign, which shows the direction from where the opposition's candidate in the 2022 parliamentary elections gets his/her directives; and
- the last picture in the lower row repeats the previous message, i.e. Soros 'owns' the EU (Annex 1: 9) except, in this picture, the new generation of the Soros Empire stands behind the new leader of the EU (Annex 1: 15).²⁰

These images signify that Soros is always hidden in the background (his smile expressing the satisfaction of a sure winner, his arms resembling the tentacles of an octopus), which image is further reinforced by the frames of the texts. As a result of this campaign, by the autumn of 2018, an absolute majority of the Hungarian population had become convinced that George Soros was bringing refugees to Europe in the framework of a grandiose, secret plan (see Note 5).

The production and circulation of migration-related narratives in an IA/MPB system

Since both the media and the parliament are under the hegemonic rule of the government, the default situation is that the MPB provides identical narratives for both – in other words, concerning important issues, narratives are produced top-down and centrally coordinated in the Prime Minister's Office. Investigative journalists (Szabó and Pogonyi 2022) have illustrated this mechanism using the reaction of the MPB headquarters to the Russian attack as an example:

(...) hours after the outbreak of the war, the Chief of Staff of the PM's Office convened a meeting for the leaders of government departments and think-tanks responsible for the communication strategy and summarised the communication strategy of the government (official position, main messages, etc.). The narratives were already ready (developed on the basis of non-public pro-government research): peace, avoiding participation in the war and shipment of weapons. (...) In late March (i.e., a fortnight before the election) the MPB headquarter[s] added Zelensky to the standard list of scapegoats (Soros, the EU and the opposition).

According to an interview, the Orbán government regularly tests the concerns/fears/expectations of its potential voters, then makes decisions without any deliberation in parliament – the results are communicated to and by the media and put into practice by policy-making. In other words, the media and parliament do not have much influence over the government's decisions; they only channel the government's narratives and legitimise the decisions which it has previously made. The success of these narratives is usually immediately visible in the public opinion polls. For instance, research revealed²¹ that, before the 2022 elections, 86 per cent of voters in Hungary were exposed to claims stating that the opposition intended to deploy military forces to Ukraine, while 67 per cent encountered allegations that the leftist parties endorse sex reassignment surgeries. The public, too, manipulated for years by the MPB

propaganda machinery, often believes them to be true. Specifically, 60 per cent of respondents who were aware of the rumours about sending Hungarian troops to Ukraine in the case of an opposition victory regarded these claims as true. These statistics starkly illustrate the effectiveness of the government's disinformation campaigns, which are becoming increasingly reminiscent of Orwellian tactics.

The framing of the narratives is also determined by MPB experts at the top (operating within a network of think-tanks, spin doctors, journalists and politicians), therefore the priming and framing terminology is similar in the media and political spheres and mutually reinforcing.

There are no distinct policy narratives – i.e., either all policy actions are carried out without any policy discourse or, if there is any, they are identical to the simple 'translation' of the political decisions for the media and politics. More importantly, the government can tailor flexibly the production of migration narratives (and apply the potentially most effective frames) both to its short-term (even often *ad hoc*) economic and political interests and to its general ideology. Unsurprisingly, actual migration processes are less relevant than the political profit which IA can earn by applying such solely ideology-driven policies.

The main difference between the narratives of the migration process in 2015 and 2022 can be partly explained by the differences between the main characteristics of the migrants in the same period (Surányi and Sik 2025, in this section). Moreover, between 2015 and 2022, the strength of IA and the MPB as significant contributors to its power has increased enormously. First, IA had a much stronger impact on the media in 2022 than in 2015. The role of various MPB agencies has been tested several times and it now runs smoothly. The complex methodology of thematising and priming and the application of the tools (national consultations and special MPB language, etc.) has become almost automatic (Bátorfy and Urbán 2020). Consequently, the MPB in 2022 could immediately divide its operations, distinguishing between 'proper' and 'improper' migrants, to maximise the impact of 'refugee hypocrisy' (Pepinsky, Reiff and Szabó 2024) as part of its migration discourse. However, though the narratives were more diverse in 2015 than in 2022, the basic ideology upon which the narratives are built has not changed: the main purpose of the MPB narratives is to evoke fear and provide proper scapegoats. Conspiracy theories about George Soros, Brussels and their allies become the official, final, axiomatic explanations for all the problems which Hungary is facing, from high inflation to the low salaries of teachers. These campaigns are exploiting an inherent contradiction found in the empirical research on conspiracy theories. While these theories, as epistemic sense-making processes, can seemingly plausibly explain unexpected events to voters (van Prooijen and Douglas 2017), such as wars, viruses or mass migration, embracing these theories has been found to further induce the latter's fears and anxieties instead of reducing them (see, for example, Liekefett and Becker 2023). This explains why Soros-related conspiracies worked so well for the MPB in the migration discourse – for example, Soros imports millions of migrants, the Soros network recruits migrants and prepares them with mobile phones and information leaflets and Soros as a puppet-master influences EU leaders behind the scenes to pass pro-migration laws, etc.

A lucid example of how to combine the standard MPB themes and scapegoats (Soros, the EU, migration and gender propaganda) is provided in a speech by Orbán in July 2022:

There is less talk about migration now but, believe me, nothing has changed. Brussels, with its Soros army, simply wants to force immigrants on us. (...) we just want them to accept that, in our country, the father is a man, the mother is a woman and our children should be left alone and that they should make George Soros' army accept this.²²

In May 2023, at the annual CPAC (*Conservative Political Action Conference*) meeting in Budapest, Orbán framed the war somewhat differently, proudly declaring the regime to be the spearhead of the conservative attack against arch-enemies such as the left and the liberals and their worldwide conspiracy under the disguise of globalisation who actually only want to destroy nations, freedom and the basic morals of conservatism. The narrative contains the same themes and scapegoats (Soros, Brussels, migration, leftist liberals, gender and woke ideologists, NGOs, etc.) and was ‘updated’ for the post-COVID and war era: it uses a virus analogy and claims that Hungary is an incubator for testing the serum against the cosmopolitan/globalist attack on ‘normality’:

(...) Uncle Georgie [a derogatory nickname for George Soros] announced his resettlement programme. He mobilised his NGO army and set about implementing his grand plan. They flooded the Balkans with illegal migrants and built a people-smuggling route leading into the heart of Europe. Then they came up against Hungary. We gave the command to halt, we took up the gauntlet and we defended ourselves: we built a fence and we defended our country. (...) Today we can see that this virus has not simply escaped: it has been bred, it is being propagated and spread all over the world. Migration, gender and woke: these are all just variants – variants of the same virus. (...) The good news for everyone is that we need look no further for a serum for the progressive virus: it is here, in Hungary. (...) All that is needed, before the election, is to write, in huge, prominent letters on your flag: ‘No migration! No gender! No war!’²³

The official pro-governmental approach refers to the pro-refugee behaviour of the government in 2022 as proof that the government has never acted against migration in a racist way but only followed the principle that Hungary accepts refugees only when Hungary is the first safe country for them, which was not the case in 2015. However, the previously quoted excerpts of Orbán’s recent speeches prove that the basic MPB anti-migration rhetoric still dominates the ideology, though it is embedded in other themes and uses fine-tuned frames.

As we wrote earlier, the ‘Soros-network’ was referred to by Hungarian propaganda as the core actor since the first push polls and campaigns, in 2015/2016 up to now, uninterruptedly using migration as a tool to destroy the sovereignty of Hungary. The only changes were that while, at the beginning, the pro-migration messages were associated with the devilish smile of George Soros, now it is Alex Soros and Zelensky and the EU leaders can be seen on TV, on the net and on every corner of Hungarian streets.

Conclusion: Is Hungary an outlier?

The case study presented above, in line with the position of some renowned political scientists (Enyedi 2023), seems to indicate that the theory on informational autocracies needs revision in one particular aspect that informational autocracies (unlike, for example, the communist or fascist regimes of the 20th century) are not necessarily non-ideological. Messages on competence and ideology – the latter using fake news and conspiracy theories (in the present case, the almost continuous use of the ‘Soros-phenomenon’) whenever needed – may be well-combined and synergistically used to convince people to accept the rule of the ruling party. The excerpts also show the ability of the MPB to contribute to (and not replace) the original IA theory with the importance of ideologies (Enyedi 2023), identified as an essential, *sine qua non*, element of the MPB propaganda that ‘entertains’ voters via fuelling moral panics constantly.

The operation of the MPB: The Soros phenomenon

To illustrate the operation of the MPB (i.e. how the pressings of the button – usually push-polls¹³ – and the *à priori* and/or *ex-ante* media campaigns are combined), we briefly show how the Soros phenomenon (overlapping with the migration discourse) has been used in the propaganda.

Soros seems to be a ‘perfect’ candidate for a position at the centre of a global conspiracy theory.¹⁴ The basis for his candidacy involves the following (intertwined and equally important) characteristics: he is a speculator, a multibillionaire, a cosmopolitan, committed to democracy and civil society and runs worldwide NGO networks. Moreover, under certain regimes and according to various political actors, further characteristics of Soros have been added to this image: Soros as an immigrant and/or a major donor to the Democratic Party in the US, a Jew in Hungary,¹⁵ a US citizen in Russia and a supporter of Palestine in Israel.

There are, however, certain conditions beyond Soros’ characteristics, which may further facilitate the spread of the ‘Soros phenomenon’. McLaughlin and Trilupaityte (2013) argue that globalisation gave birth to the international diffusion of narratives and ideas, as well as created transnational linkages between NGOs that pose a threat to political actors oriented towards nationalism and protectionism. This was especially the case during and after the disintegration of the socialist regimes, when political elites looked to nationalism to fill the ideological vacuum left by Marxism–Leninism and used it to grab onto and retain power.

Soros makes for an interesting case study in the international circulation of political attacks. Soros’ reputation evolved differently in varied regions of the world, as his unique career as a currency speculator, philanthropist and political actor changed over time. (...) Serbian dictator Milošević tried to evict Soros’ foundation from his country by closing its offices in Belgrade (...), and Belarus’s dictator Lukashenko threatened criminal investigations against staff involved in Open Society activities, forcing the closing of the institute. Soros was a metaphor for the unjustness of capitalism, elite manipulation and shady American intervention in local politics... starting from the middle of the 1980s, the KGB was actively trying to link Soros with the CIA in order to discredit him (McLaughlin and Trilupaityte 2013: 432).

In societies with a weak economy and an unstable political situation and/or experiencing rapid and unexpected changes – such as the collapse of a regime, a revolution, a war or a pandemic – the image of Soros as a mastermind orchestrating major socio-political events may ‘come in handy’ as an antidote to citizens’ failure to grasp the underlying processes that cause these events (Douglas, Uscinski, Sutton, Cichocka, Nefes, Ang and Deravi 2019). Since the second part of the 20th century, globalisation has significantly increased the various forms of flows of capital, knowledge, people, etc., traversing nation-state borders and resulting in novel governance structures with high complexity levels. Recently, with transformations in the flow of information (the World Wide Web) and communication (social media), the decreasing cost of travel and the emergence of the post-truth worldview, the receptivity of the public opinion towards the simple explanations offered by conspiracy theories (including those with Soros at the core) have become widespread (Tanguay 2021).¹⁶

Disillusionment with the dominant political institutions and established political parties since the 2008 recession has led to the ascent of radical and right-wing regimes across the globe which seek to quell popular unrest through a strong opposition to globalisation, pluralism and diversity (Bonanno 2020; Morlino and Quaranta 2016; Öniş and Kutlay 2020). These regimes have been increasingly

To put the Hungarian version of IA (and the role of the MPB in it) into a comparative perspective, we should emphasise that, while none of the techniques used in the construction and operation of the Hungarian IA were invented by Hungarian experts, a compact experiment, a ‘laboratory of post-truth’²⁴ was developed and fine-tuned in Hungary. As Orbán has claimed, Hungary is ‘the anti-virus laboratory of the conservative world’. At the same time, while this paper focuses only on experiences regarding the informational autocracy developed in Hungary, it is logical to assume that informational autocracies are typically ideological. Without a clear set of moral goals and principles, it would be impossible to fabricate (and then name, shame and blame) the enemies of these regimes and to exclude them from the political community – an approach which is typically and inevitably applied by such regimes to silence, intimidate and, often., chase away opponents, as the inventors of the IA theory (Guriyev and Treisman, 2022) have argued.

Notes

1. Estimated by the authors to be about 40 per cent of the non-democratic leaders in the 2000s.
2. K-Monitor: Governing Parties Spent 8 Times More on Billboard Campaigns Than Opposition <https://hungarytoday.hu/government-fidesz-dominance-campaign-billboard-opposition-election/> (accessed 1 September 2025).
3. It is embedded into various socio-political and historic/cultural characteristics of contemporary Hungary such as anti-empire nationalism, ethnocentrism, chauvinism, irredentism, resentment towards the ‘West’, post-peasant (primordial) nationalism, etc. (Melegh 2016; Sik and Melegh 2017).
4. According to a report published around the early 2020s, 80 per cent of advertising revenue went to pro-government media outlets (Kovács *et al.* 2021). With the strategic distribution of state advertising, the pro-government media is flourishing, while the critical media is struggling to survive.
5. See, for example, an analysis of Political Capital Institute: https://politicalcapital.hu/hirek.php?article_read=1&article_id=3338 (accessed 1 September 2025).
6. The Hungarian version of a national consultation does not serve as a first step toward a consultation process since it does not allow room for any further discussion or debate. The only goal of the national consultation is to set the political agenda (i.e. its results are used to demonstrate that the entire Hungarian nation agrees with the government) and legitimise (*à priori* or *ex-ante*) the legal and political actions of the government. For example, in the first push poll (National Consultation on Immigration and Terrorism in 2015 – Annex 1: I), the framing of the questions and the response items proves that the questionnaire is not intended to identify public opinion but to shape it – according to what the manipulator intends us to believe in (Bognár, Kerényi, Sik, Surányi and Szabolcsi 2023).
7. Which is a lie and abuses basic statistics since, while the MPB headquarters always informs the population that the overwhelming proportion of those who answered the questionnaires agreed with the questions (in the 2024 national consultation, 99 per cent), only a minority of potential voters (15–20 per cent) usually return the questionnaires.
8. There are various explanations as to why migration is a common source of moral panic, including socio-biological (invasion as a primal threat to human beings) and socio-psychological reasons (Stephan and Stephan 1996). The sociological model of methodological nationalism also

- explains why migration is unavoidably a threat for an ‘imagined community’ such as the nation (Wimmer and Glick Schiller 2003).
9. The spring consultation in 2020 (Annex 1: IX) was cancelled due to the unexpected arrival of COVID.
 10. We consider the campaign in relation to the Russo-Ukrainian war in 2022 (Annex 1: 13–14) as an action which was not a pressing of the MPB since the crisis was not artificially generated by it.
 11. <https://444.hu/2023/11/17/brusszel-magyarorszagon-is-migransgettot-akar-letrehozni-itt-vannak-az-uj-nemzeti-konzultacio-kerdesei>.
 12. <https://kormany.hu/hirek/hetfotol-indul-a-nemzeti-konzultacio-ime-a-kerdesek>.
 13. ‘AAPOR defines a “push poll” as a form of negative campaigning that is disguised as a political poll. “Push polls” are actually political telemarketing – telephone calls, disguised as research, that aim to persuade large numbers of voters and affect election outcomes, rather than measure opinions (<https://www.archive.aapor.org/Standards-Ethics/Resources/What-is-a-Push-Poll.aspx>).
 14. George Soros was perhaps first subject to conspiracy-like political attacks when he was labelled a CIA agent by Chinese party members in the mid-1980s (McLaughlin and Trilupaityte 2013).
 15. Soros has been a well-known figure in Hungary since the late 1980s and there have been conspiracy theories about him from the very beginning. They emerged in the years following the collapse of socialism, when nationalist movements, capitalising on the resurfacing of ethnic tensions as well as a long history of antisemitism in the region (Astapova, Colacel, Pintilescu and Scheibner 2021; Bustikova 2015), painted a picture of Soros as the leader of a worldwide Jewish conspiracy aiming to undermine the nation’s newly gained independence (Kalmar, Stevens and Worby 2018; Langer 2021).
 16. Moreover, increasing social inequality also facilitates the spread of conspiracy theories (Casara, Suitner and Jetten 2022), i.e. the radical increase in inequalities between employers and employees, skilled and non-skilled labour, urban and rural areas, global and domestic producers, as well as between regions and sectors with differing levels of economic development triggered by globalisation may also explain the success of the Soros phenomenon (Rodrik 2018).
 17. The first attempt by the Orbán government to arouse anti-Soros sentiment was an article in 2014 that claimed that the Open Society Foundation, although having officially ended its activity in Hungary in 2007, actively supported human rights organisations linked to the opposition – or indirectly supported activists and movements critical of the government. The campaign resulted in an anti-NGO act, essentially a copy of the one enacted in Russia not much earlier.
 18. This picture subsequently led to a debate regarding the image’s potential antisemitic connotations. The Ambassador of Israel in Hungary criticised this portrayal in a *communiqué* and asked the Hungarian government to stop hate-mongering. However, as the result of the smooth cooperation between Netanyahu and Orbán, the next day the Israeli Prime Minister got the *communiqué* annulled (<https://24.hu/kozelet/2017/07/10/izraeli-hatraarc-soros-ugyben/>).
 19. Migration appears as an angry face emoji with the message ‘Are you outraged because of illegal migration?’ https://hvg.hu/itthon/20210707_emoji_reklam_kormany_nemzeti_konzultacio.
 20. The original idea, however, was to put Zelensky instead of Alex Soros, <https://www.lakmusz.hu/az-eredeti-terv-szerint-nem-alex-soros-hanem-zelenszkij-emelte-volna-fenyetoen-a-kezet-a-nemzeti-konzultacios-plakatokon/>.
 21. ‘What has been proven by the Hungarian election results?’ *Dimenzió Média Alapítvány*, 31 July 2022, https://www.dimenziomedia.hu/hir/What_has_been_proven_by_the_Hungarian_election_results-144.

22. <https://miniszterelnok.hu/orban-viktor-eloadasa-a-xxxi-balvanyosi-nyari-szabadegyetem-es-diaktaborban/>.
23. <https://miniszterelnok.hu/en/speech-by-prime-minister-viktor-orban-at-the-opening-of-the-cpac-hungary-conference/>.
24. <https://vsquare.org/hungary-is-a-post-truth-laboratory-peter-kreko/>.

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Conflict of interest statement

No conflict of interest was reported by the authors.

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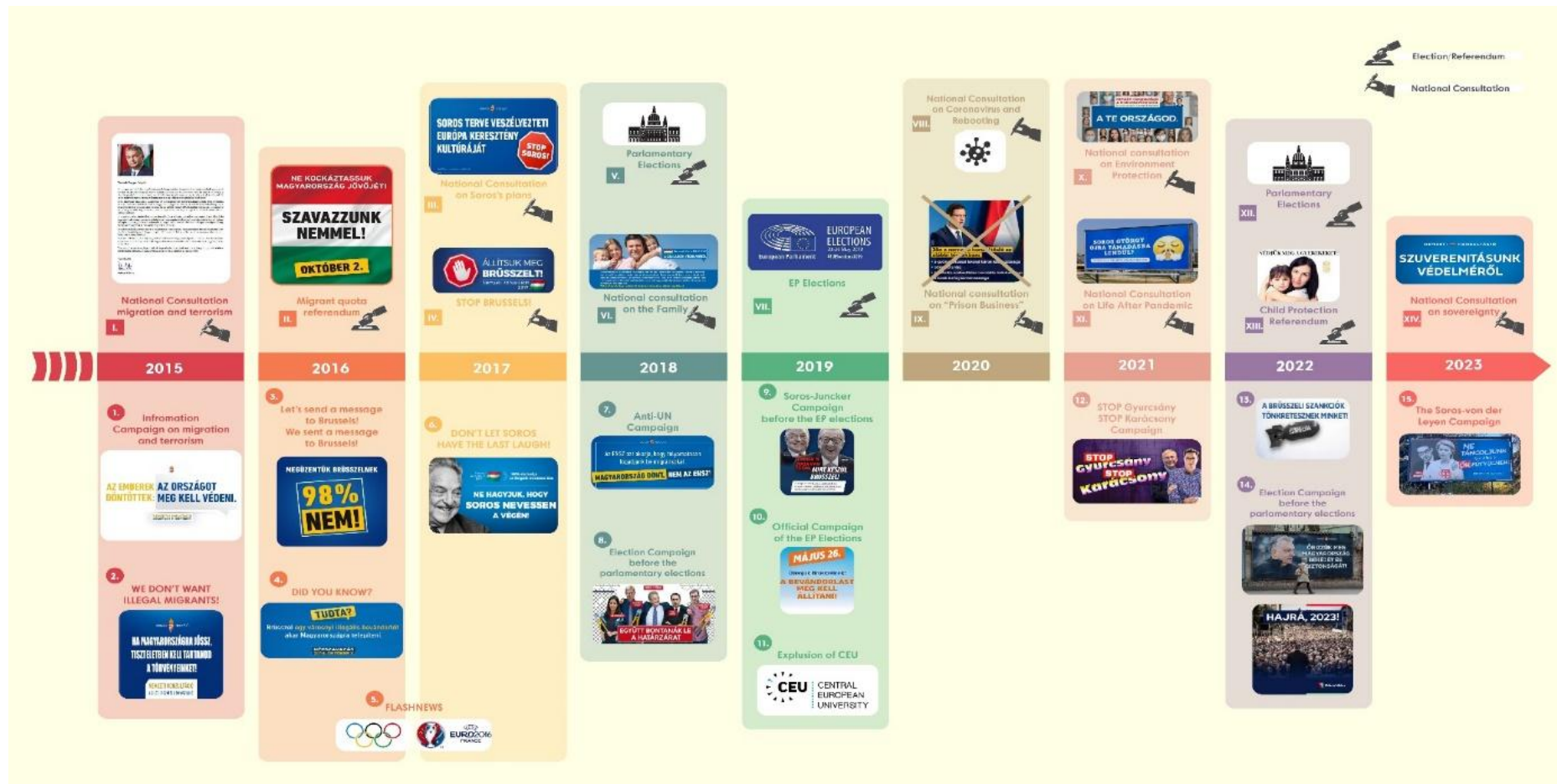
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Annex 1

Figure 1. The ‘history’ of the moral panic button, 2014–2023



Source: Created by the authors.

Annex 2. The 2 most recent (2025) pressings of the MPB



They would invite Ukraine to join the EU – but we would pay the price!



Like 2 eggs: Zelensky and the Hungarian Zelensky (Péter Magyar, the leader of the Tisza Party – at the moment more popular than Fidesz).

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Similar but... The Trend of Xenophobia in Hungary and Poland

Ráchel Surányi*, Endre Sik**

In 2015, immigration became a major source of concern (and perhaps fear) both for Hungary and Poland and for the EU at large. It then declined continuously until 2022, before starting to rise again in 2023. Concerning the fear of migration in relation to one's own country, both the Hungarian and Polish trends deviated from the general pattern: while, in Hungary, the fear of immigration remained slightly more salient until 2018, in Poland, the fear of immigration was constantly (and, until 2022, significantly) below the EU average. However, like in Hungary and other EU countries, it increased again in 2023. In this paper, we compare these 2 countries in terms of xenophobia using Ipsos data which have not yet been examined by others in this regard. We looked first at attitudes and then at behaviour (i.e. activism immediately after the Russian invasion of Ukraine and then 1 year later). We also examined the differences between the socio-demographic variables in both groups.

Keywords: refugee hypocrisy, xenophobia, attitudes, Hungary, Poland

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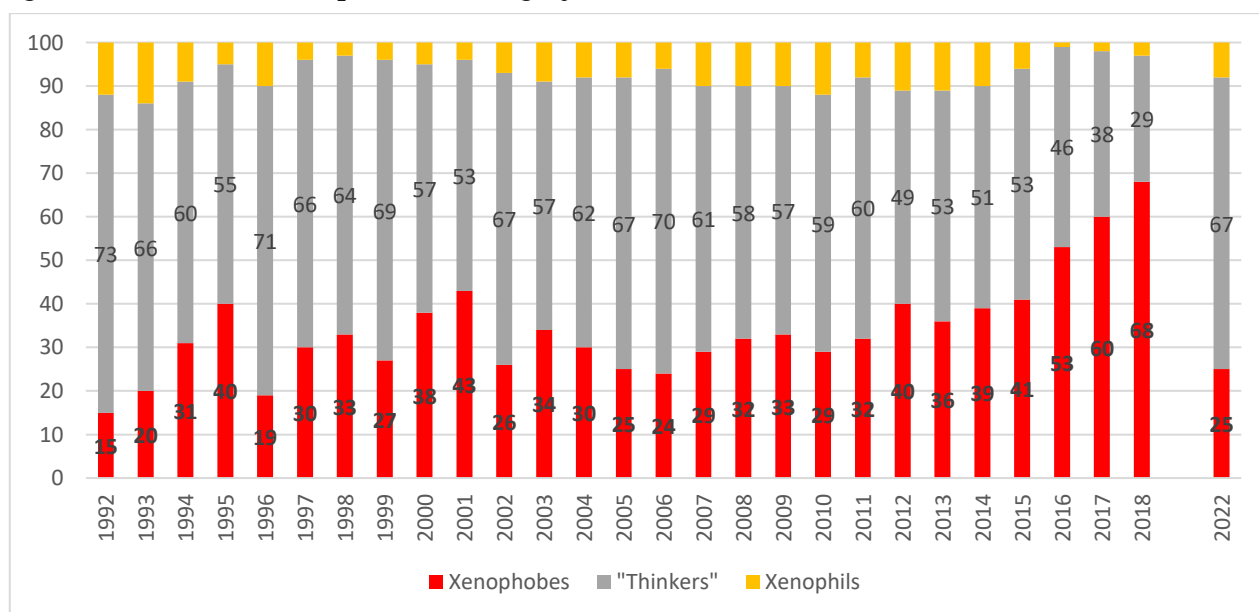
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Introduction

In this paper, we analyse and compare xenophobia in 2 countries – Hungary and Poland. Our empirical research is based on data¹ acquired from Ipsos.^{2,3} Use of the term ‘xenophobia’ to refer to prejudice against legally and socially different groups of mobile people (refugees, migrants, asylum-seekers) is likely to conflate different attitudes (see, for example, Abdelaaty and Steele 2022). However, we would argue that respondents are hardly aware of the difference between the latter terms since, in both countries, government propaganda has deliberately blurred the distinction between ‘refugees’ and ‘migrants’ (and has hardly ever used the term ‘asylum-seeker’), mainly using the term ‘migrant’ with its more negative connotations (for Hungary, see Gerő, Pokornyi, Sik and Surányi 2023 and, for Poland, see Hargrave, Homel and Dražanová 2023). Furthermore, the Ipsos questionnaire also used only the term ‘refugee’, as it was prepared to coincide with the World Refugee Day.

In Hungary, the level of xenophobia remained relatively stable between 1992 and 2010 (Figure 1). Until 2015, the majority of the population belonged to the category of ‘thinkers’ (grey segment – those who would give asylum to those whom they perceive deserve it⁴). The proportion of xenophobes (red segment – those who would reject anyone who asked for asylum) increased slowly between 2010 and 2015 and then rose sharply. However, according to a recent analysis (Pepinsky, Reiff and Szabo 2024), as a result of the moral panic button (MPB⁵), which has involved using a benign framing for refugees from Ukraine (‘proper’ refugees) versus those from non-European countries (‘improper’ refugees), Hungarian public opinion towards refugees became ‘bifurcated’, as the word ‘refugee’ took on different meanings (white, Christian, European, deserving) to its earlier counterparts (non-white, Muslim, non-European, undeserving). This shift has also been confirmed by other sources – the claim that the majority of Hungarian society think that Ukrainian refugees should be accepted, at least for a limited period of time or until the war is over (Tóth and Bernát 2022).

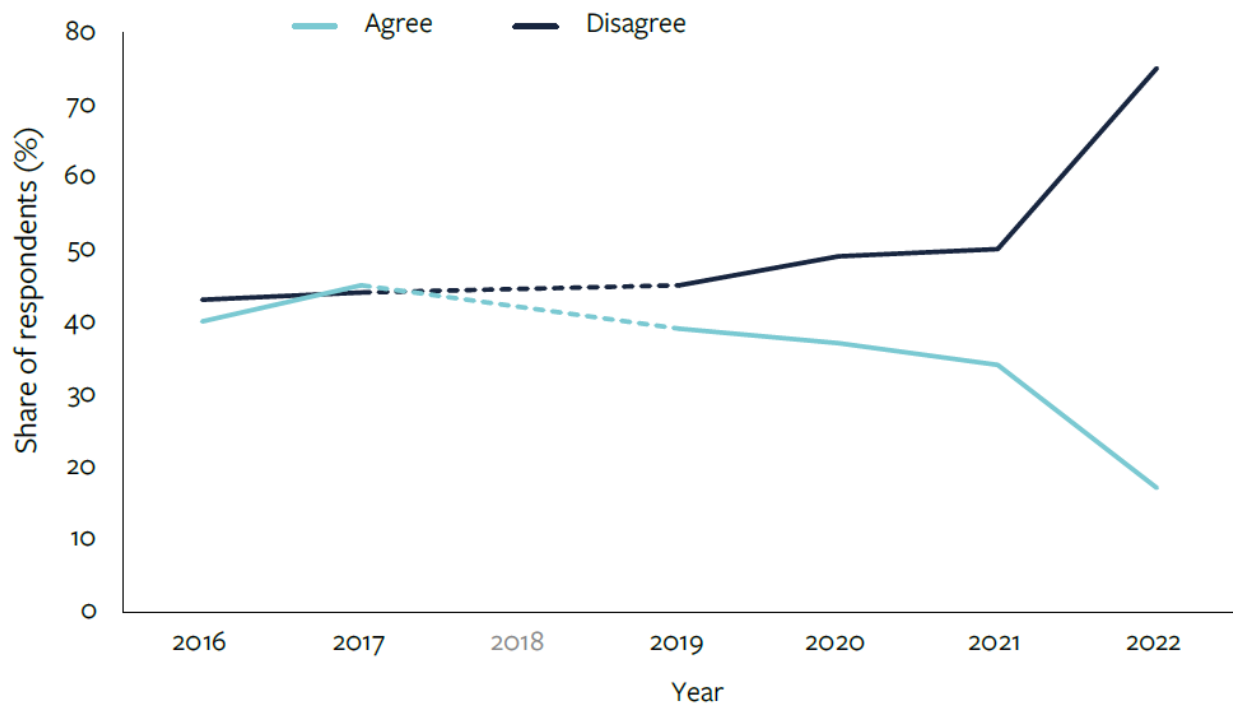
Figure 1. The level of xenophobia in Hungary, 1992–2022, %*



Source: Pepinsky *et al.* (2024); Sik (2016).

* ‘Xenophils’: would give asylum to everybody, ‘xenophobes’: would reject all asylum seekers, ‘thinkers’: would give asylum for certain people depending on their case.

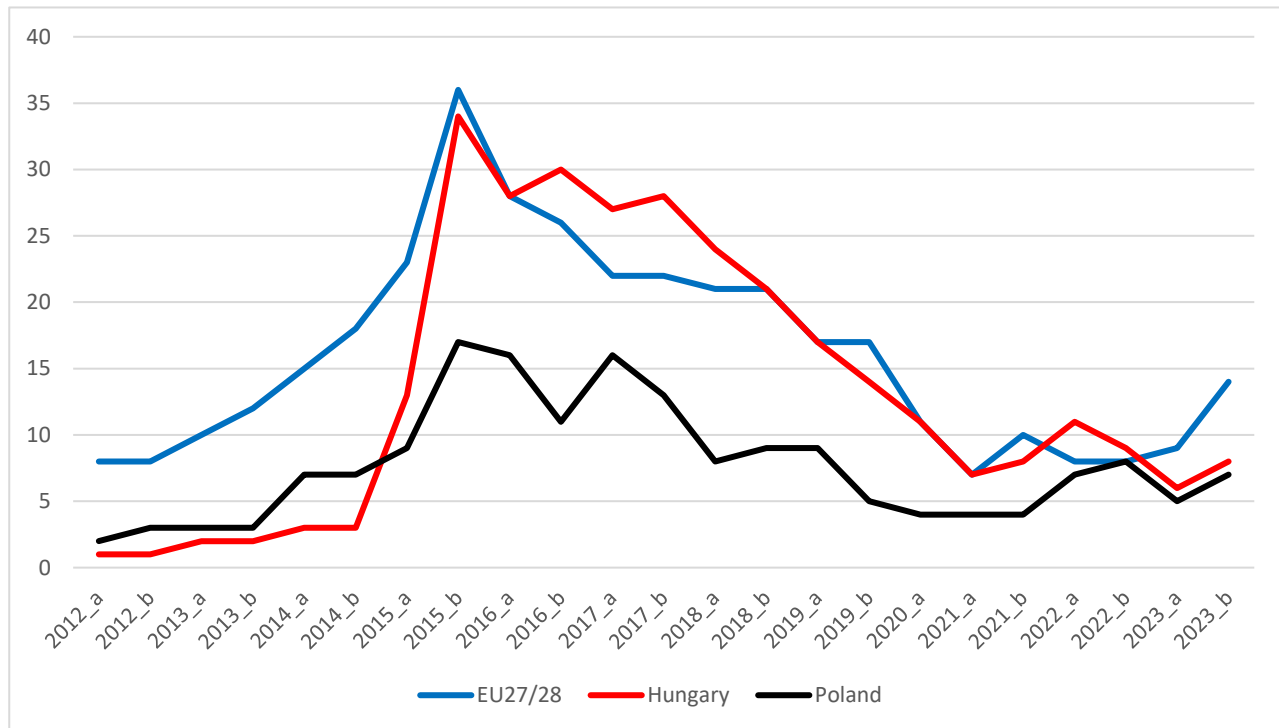
Figure 2. Polish opinion on closing borders to refugees, 2016–2022, %



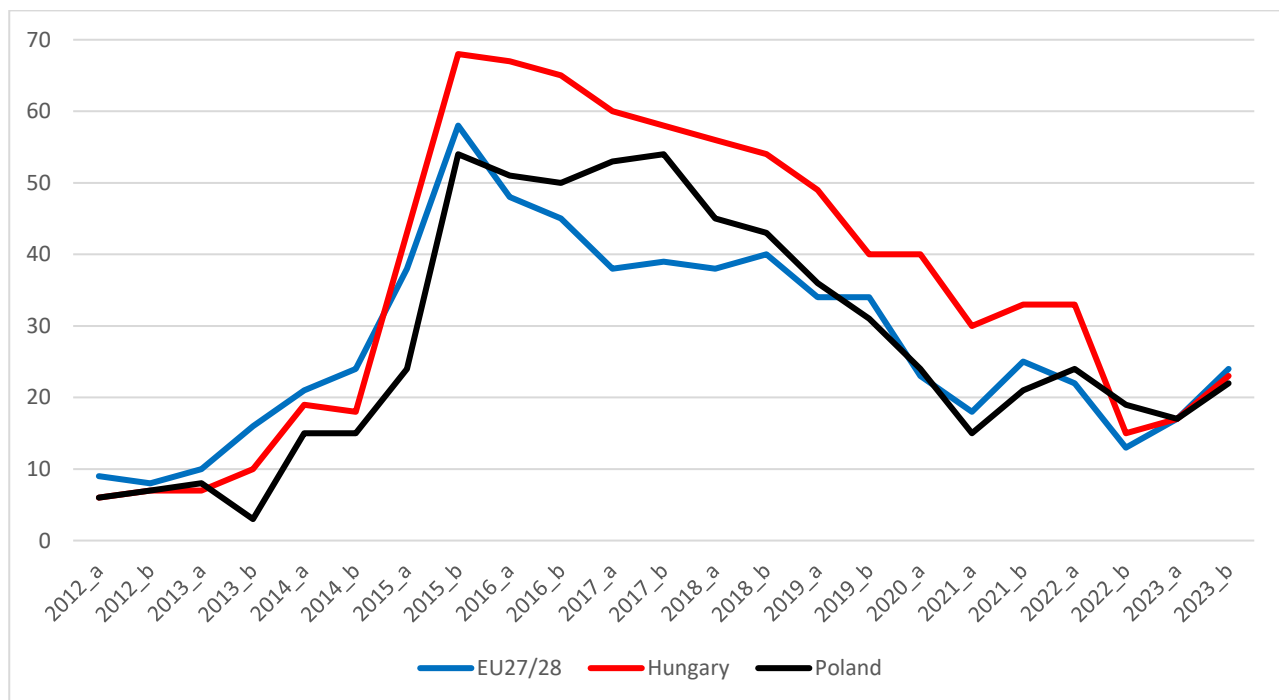
Source: Hargrave *et al.* (2023: 21).

The trend is clear from Figure 2: agreement with closing the borders originally increased and then started decreasing, followed by a sharp decrease in 2022.

We assumed that the sharp drop in the level of xenophobia which we observed in Hungary and Poland in 2022 was not the exception but the rule among EU countries. The Eurobarometer survey confirmed our assumption (Figures 3 and 4). In 2015, immigration became a major source of concern (and perhaps fear) both for the countries under analysis and for the EU countries at large and then declined continuously until 2022; it started to rise again in 2023. Regarding the fear of migration as applicable to their own countries (see Figure 3), both the Hungarian and Polish trends deviated from the general pattern: while in Hungary, the fear of immigration remained slightly more salient until 2018, in Poland the fear of immigration was constantly (and, until 2022, significantly) below the EU average but, like Hungary and other EU countries, it increased again in 2023.

Figure 3. The level of fear from migration for the country in Hungary, in Poland and in the EU, 2012–2023*

* The proportion of those who consider immigration as one of the two biggest challenges for the country in the Spring (a) and in the Fall (b). Own editing based on <https://europa.eu/eurobarometer/surveys/detail/3052>.

Figure 4. The level of fear from migration for the EU in Hungary, in Poland and in the EU, 2012–2023*

* The proportion of those who consider immigration as one of the two biggest challenges for the EU in the Spring (a) and in the Fall (b). Own editing based on <https://europa.eu/eurobarometer/surveys/detail/3052>.

As regards the level of fear of immigration for the EU (Figure 4), the trend is similar (but at a much higher level) than the country-specific tendency. While, in Hungary, the threat of immigration for the EU countries as a whole remained a major issue for almost the entire period (2015–2022), in Poland the trend was similar to that for all EU countries, except for a short period between 2015 and 2019.

Various comparative European data on xenophobia have shown that countries on the eastern and southern periphery have significantly higher levels of xenophobia than the core EU countries (and Scandinavia). Moreover, several ESS-based analyses have proved that the level of xenophobia in Hungary has always been higher than in other European countries and that, after 2015, it increased faster than elsewhere in Europe (Czymara 2021; Messing and Ságvári 2019, 2021). The heat map of the DEREK index (Demand for Right-Wing Extremism, see Map 1 in Annex 1) shows that the average level of prejudice and welfare chauvinism was much higher in Hungary than in Poland both before and during the refugee crisis; the trend of the ESS (migration) Rejection Index (Figure 1 in Annex 1) shows that the level of xenophobia has always been higher in Hungary than in Poland. The Ipsos dataset shows that, if we extend the trend to 2022, support for refugees and the concept of asylum in general has increased (Hargrave *et al.* 2023).

In this paper, we use Ipsos data to analyse the level of xenophobia in Hungary and Poland between 2020 and 2023. These surveys were part of an international study conducted in 28 countries. Approximately 500 individuals aged 16–64 in 2020 and 16–74 between 2021 and 2023, participated in the studies in Hungary and Poland each year via the Ipsos Online Panel. The fieldwork was conducted between 22 May and 5 June 2020, 21 May and 4 June 2021, 22 April and 6 May 2022 and 21 April and 5 May 2023. The samples in Hungary and Poland can be considered representative of their general adult populations under the age of 75. The precision of Ipsos online polls was calculated using a credibility interval, with a poll of 500 accurate to ± 4.5 percentage points. Our research questions were as follows: What are the similarities and differences between the countries with regards to the trend in the level of xenophobia before, during and after the Russian attack? Were these trends similar across the entire population or were there social groups whose levels of xenophobia changed either more or less than average? Since we do not have the data themselves,⁶ our aim is limited to presenting a descriptive analysis that compares the trend and the social basis of the level of xenophobia both before and after the Russian invasion of Ukraine.

We assume that, while the two countries share many similarities in terms of history and culture,⁷ their migration policies and current political contexts are very different. In another article in this special section, we first identify the MPB (Gerő and Sik 2020) as a basic tool deployed to transform Hungary into an informational autocracy (Sik and Krekó 2025, in this section), which did not exist in Poland, which was more like a democracy with autocratic tendencies at the time of the Ipsos polls. Secondly, while migrants have been used by the MPB as scapegoats in Hungary since 2015, no fully fledged anti-migrant propaganda has ever been constructed in Poland. There were only 2 periods when this topic was part of the agenda: first, after the 2015 refugee crisis in the parliamentary election campaign, which was the first time it had formed the subject of a national debate (Szczebanik 2018) and then, secondly, during the 2023 parliamentary election campaign, which served as a hotbed for disinformation about refugees (Neuberger 2023).

Hungary and Poland: Selection of the two cases

In terms of political context, both Hungary and Poland underwent political shifts to the right in the 2010s. The conservative turn in politics contributed to stronger anti-migration and EU skepticism in the

2 countries, both of which have experienced a rise in nationalist movements that emphasise the protection of national identity and cultural values (Sik and Melegh 2017).

Turning to their stance on immigration, as both countries share ‘a history which is filled with stories of “us” and “them” and recurring conflicts which threatened the countries’ autonomy’ (Davies 1981; cf. Goździak and Márton 2018: 127), it is not surprising that they both opposed the EU’s refugee solidarity policy during the first refugee crisis in 2015. Both countries have implemented policies to control immigration and have expressed concern about the potential impact of large-scale migration on their societies. There were also many overlaps in their migration narratives, such as the contrasting of ‘good’ and ‘bad’ refugees, the securitisation aspect (migrants as threats) and the aforementioned ‘othering’ (in Poland, see Goździak and Márton 2018; Hargrave *et al.* 2023; about the migration narratives in Hungary, see Surányi and Bognár 2025, in this section).

The 2015 refugee crisis had a significant impact on the 2 countries, shaping public opinion and political discourse. The fear of losing one’s national identity, together with security concerns, played a role in the negative attitudes towards immigrants and refugees, resulting in the phenomenon of ‘Islamophobia without Muslims’ (Górak-Sosnowska 2016), which resonates with the phenomenon ‘Antisemitism without Jews’ (also about Poland, Cała 2006). However, while Hungary adopted a more restrictive and anti-immigrant stance early on, exemplified by the construction of border fences and strict immigration policies, Poland did not implement such extreme measures at that time.

In their analysis of the impact of the 2022 refugee crisis, Moise, Dennison and Kriesi (2023) argue that Poland and Hungary share significant similarities, partly due to their historical experience of Russian occupation and their shared border with Ukraine, which makes them a first point of entry to Europe. The post-Soviet legacy also leads to ‘a suspicion concerning anything “foreign” and describing “Brussels” as the new equivalent of “Moscow”’ (Sik and Melegh 2017: 77). However, Poland has received hundreds of thousands of Ukrainian (and other) refugees since 2014, when the conflict between Russia and Ukraine started (Hargrave *et al.* 2023) – i.e. the refugee flow from Ukraine has been much more continuous there than in Hungary. Moreover, in 2022, Poland received among the most Ukrainians (after Russia and Germany) who wanted to stay in the country and asked for protection.

Recently, there has been a significant difference in the approach of the governments to Russia and Ukraine: while, in Poland, the government has shown clear disapproval of Russia, the Hungarian government is ‘hesitating’ (Madlovics and Magyar 2023). Furthermore, before the war erupted, Ukraine’s new Minority Law worsened the situation of (all) minorities in the country, exacerbating the already existing conflict between Ukraine and Hungary (Zsiborás 2023).

Regarding the impact of the political context on the level of xenophobia in 2022, we assumed that, in Poland, the level of xenophobia would decrease significantly because the aggressor (Russia) is an arch-enemy (although there are conflicts with allies – the EU) and the refugees are ‘real’ and historically close (though sometimes ‘bad’) neighbours. In Hungary, we assumed a milder decline in xenophobia because the government propaganda downplays enmity with Russia (while artificially exaggerating conflicts with allies – the EU).

We also assumed that, due to the strong inertia of values (Dennison and Geddes 2019; Kustov, Laaker and Reller 2021), the artificially increased level of xenophobia in Hungary would decrease less sharply than in Poland and rise again sooner, due to the weaker civil society and the waning of media and personal interest (Lorenz-Spreen, Bjarke, Hövel and Lehmann 2019). We further assumed that the trends in the level of xenophobia would be similar for the whole population, i.e. that there would be no relevant deviations between social groups, because calamities (such as an unexpected war) have more or less the same effect on the whole of society.

Taking into account the three aspects mentioned above, we assumed similar but not identical reactions in the 2 countries.

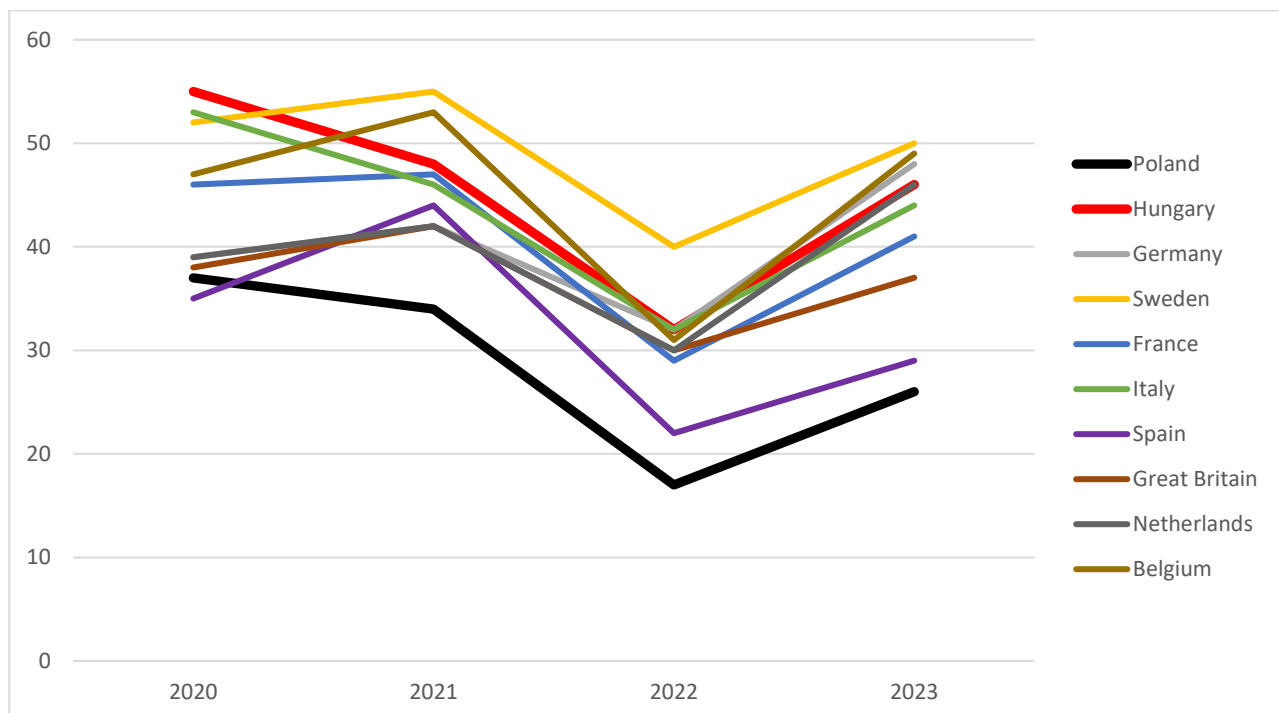
Trends in xenophobia in Poland and Hungary, 2020–2023

Both the unexpected decline in the level of xenophobia in 2022 in Hungary (Figure 1) and across Europe (Figures 2 and 3) – and, in the latter cases, its slow increase in 2023 – are lucidly visible in the new Ipsos global survey (Ipsos 2023). Regarding the trend in levels of xenophobia, Ipsos (2023: 2) concluded that:

While attitudes towards refugees became more positive in 2022 in the aftermath of the invasion of Ukraine, they have since dampened slightly in a number of countries. Nevertheless, overall public support for the principle of giving people refuge remains high at 74 per cent and is still more positive than in 2021 when the pandemic led to increased concern about borders.

Poland and Hungary fit perfectly into the general trend with the selected 10 EU countries (Figure 5). The proportion of respondents who would close the borders to refugees decreased significantly in all countries in 2022 – when the Ukrainian refugee crisis began – but this tolerant turn had evaporated by 2023.

Figure 5. The proportion of those who agree or strongly agree with the item when thinking about their country: ‘We must close our borders to refugees entirely – we can’t accept any at this time’ (%)



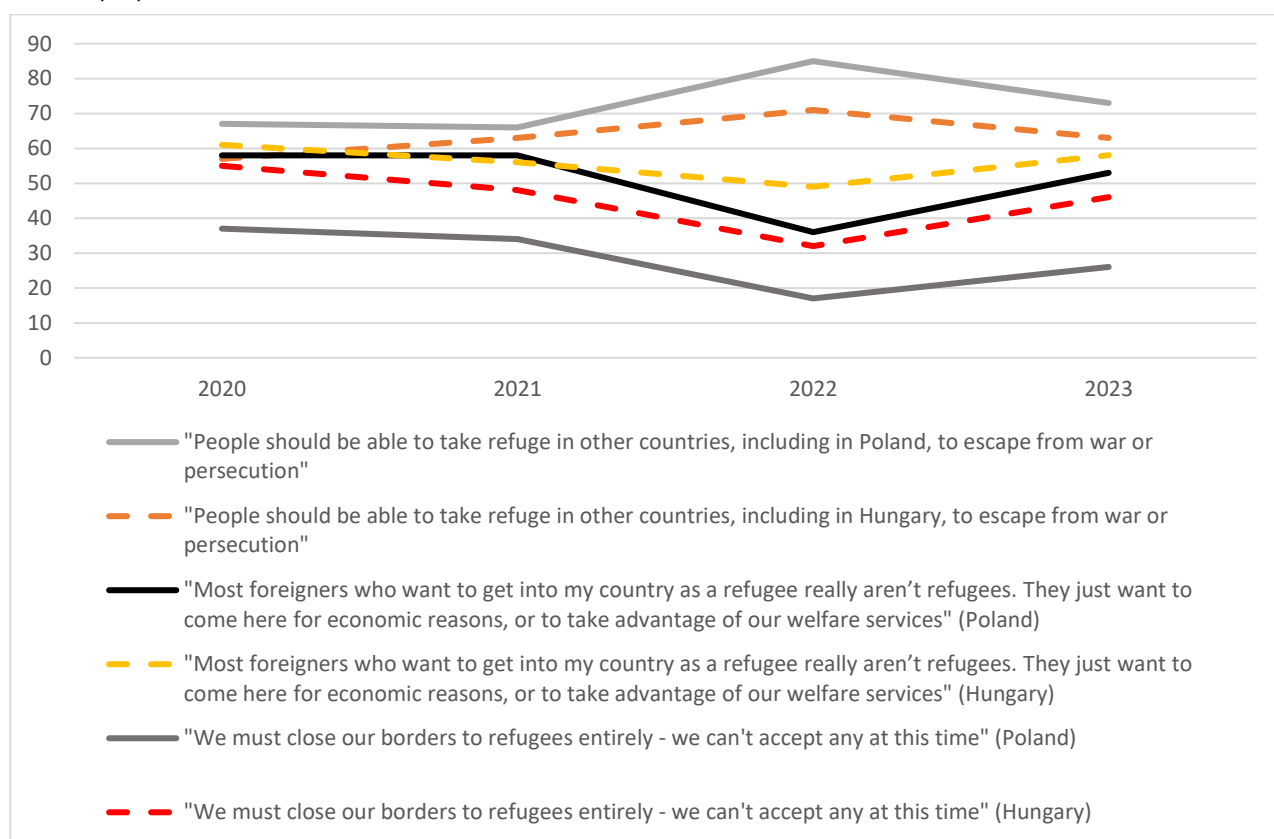
Source: Own drawing based on Ipsos World Refugee Day Global Advisor Online Survey, Belgium, Hungary, Poland, Netherlands, Spain, Sweden, 2020–2023, base 500–501; France, Germany, Great-Britain, Italy, base 500–1000, adults aged 16–75.

The trend in xenophobia was similar across Europe. Hungary and Poland were no exceptions but, in the latter country, it has always been well below average.

Figure 6 shows the development of 3 closely related aspects of attitudes towards refugees⁸ in Hungary and Poland. The trends are similar in both countries: agreement with the 2 negative statements (Refugees are 'fake' and There is a need to close the border) decreased in 2022 and agreement with the positive statement (People should be able to take refuge) increased in both countries at that time, while the opposite was the case in 2023. It is important to note, however, that, in Poland, the statement 'refugees are fake' was strongly accepted again in 2023, while the statement 'We must close our borders' was still much less accepted.

The Ukrainian refugee crisis changed all aspects of xenophobia but only temporarily: the population became less suspicious of refugees and would let slightly more refugees into their own countries and many more into other countries; however, these changes were only temporary. The findings are in line with those of Moise *et al.* (2023) who conducted surveys in 5 EU countries (including Hungary and Poland) in 2 waves in 2022 (March and July), examining attitudes towards Ukrainian refugees. We found that the support for accepting refugees slightly declined between the 2 periods.

Figure 6. The proportion of those who agree or strongly agree with the items in Hungary and Poland, %, 2020–2023



Source: Own drawing based on Ipsos World Refugee Day Global Advisor Online Survey, Hungary, Poland, 2020–2023, base 500–500, adults aged 16–75.

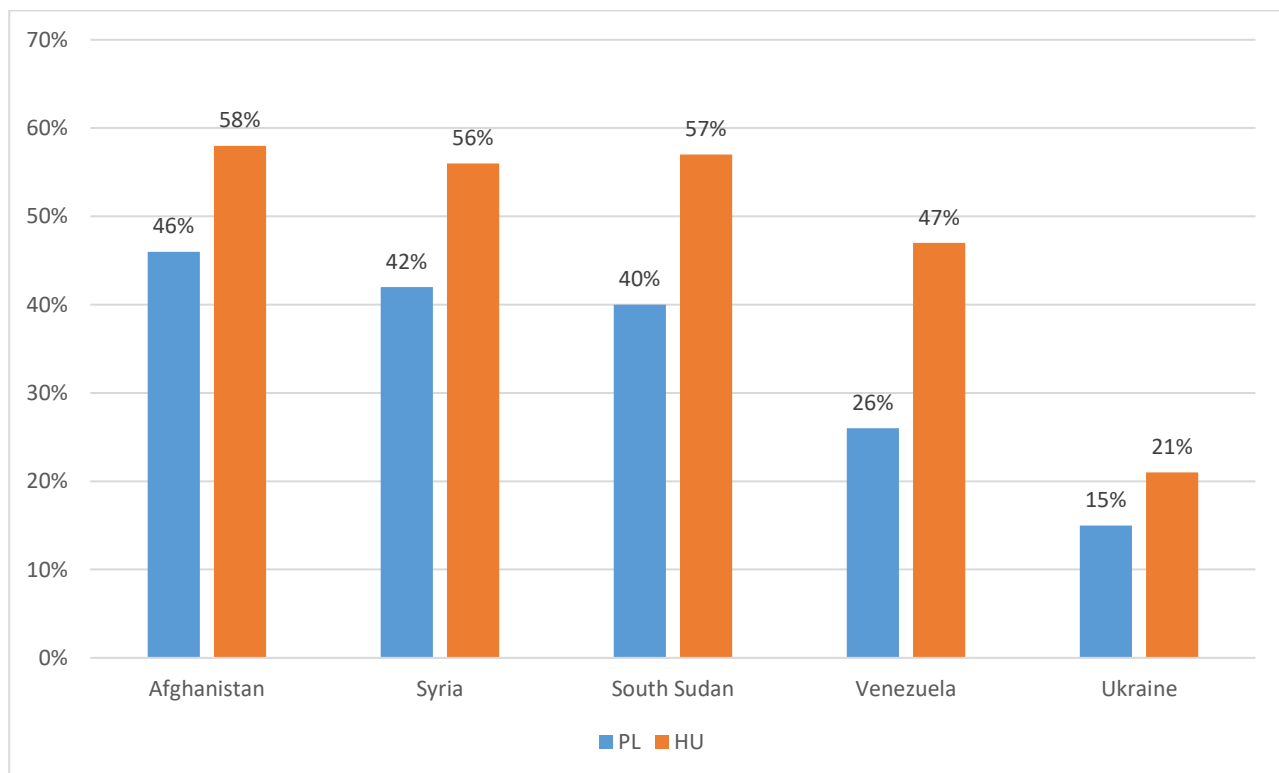
Regarding the differences between the 2 countries, the impact of the MPB is visible in Hungary, hence the more extreme figures. Both the themes 'We need to close our borders' and 'Refugees aren't really refugees' were the main narratives of the Hungarian government from 2015 onwards at varying degrees of intensity. It is also true that the 'fake refugee' narrative was popular in Poland in 2015, then again in

2018 during the elections and in 2021 in relation to the events at the Poland–Belarus border (see more in Hargrave *et al.* 2023). However, the decline in the proportion of those agreeing was much sharper than in Hungary, where the narrative was pushed more strongly and for longer. In the Polish case, we can grasp the impact of the perceptions of Russia as the aggressor and pro-Ukrainian attitudes, which are prevalent in the Polish migration discourse and stem from their historical experiences (Hargrave *et al.* 2023). Nevertheless, of course, this is a complex story: tens of thousands of ethnic Poles were killed by ethnic Ukrainians, which is still remembered (Hargrave *et al.* 2023).

Figure 7 illustrates the differences in attitudes in both Hungary and Poland regarding the country of origin of refugees in 2022. Refugees from Afghanistan, Syria and South Sudan were the least welcome in both countries and Hungarians were less tolerant than Poles about all of them. The difference in attitudes between refugees fleeing other countries and Ukraine is striking. This is most probably due to the cultural distance and perceptions of the root of the conflict (Moise *et al.* 2023). This finding – the non-acceptance of other refugees – contradicts those of Moise *et al.* (2023) concerning the so-called ‘spill-over’ effect: the latter found that positive attitudes towards Ukrainians were projected onto other refugee groups as well, at least for a certain period.

‘Refugee hypocrisy’ (Traub 2022), which refers to a certain double standard when it comes to refugees, characterises both countries but is somewhat stronger in Hungary. In Poland, the narrative of ‘us’ and ‘them’ was transposed, with Russia becoming ‘them’ and Ukrainians part of ‘us’ for a time: Ukrainians are ‘freedom fighters’ (like Poland has been in its history) against the ‘aggressor’ – Russia (Hargrave *et al.* 2023). This way, in Poland it is easier than it was in 2015 to accept refugees as ‘ours’.

Figure 7. The proportion of those who totally or somewhat oppose the statement: ‘To what extent would you support or oppose allowing more refugees into Hungary/Poland from ...?’ (%)



Source: Own drawing based on data from Ipsos World Refugee Day Global Advisor Online Survey, Hungary, Poland, 2022, base 500–500, adults aged 16–75.

The social basis of xenophobia and solidarity in 2020–2023

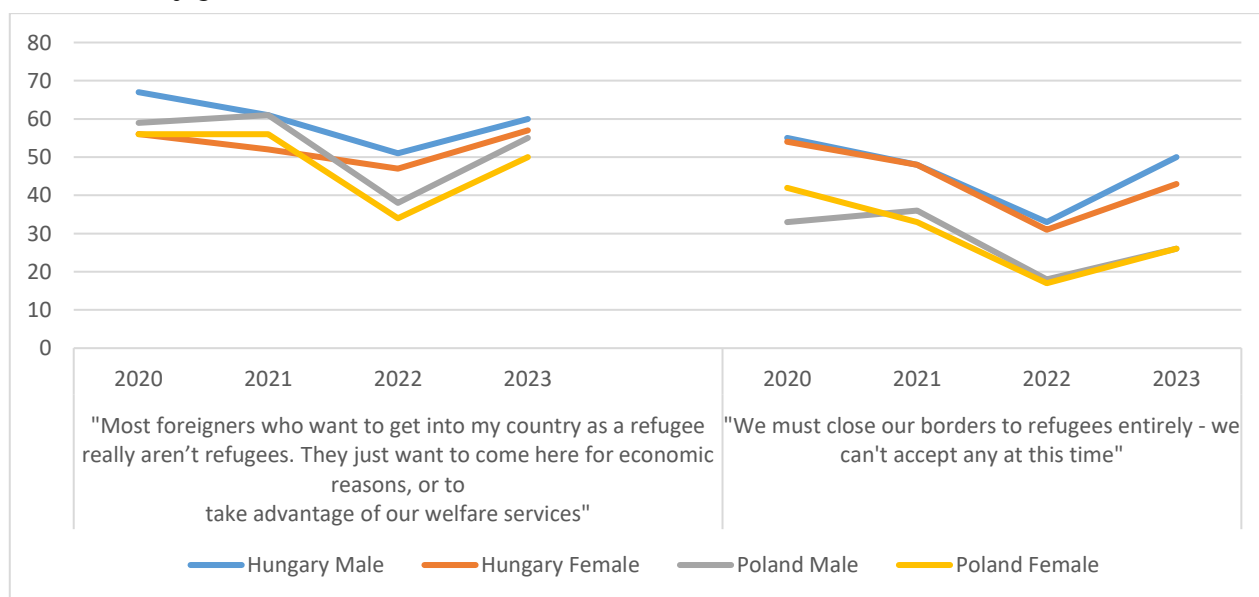
In this section, we describe the similarities and differences in the tendency towards xenophobia among various social groups between 2020 and 2023 in Hungary and Poland. The questions are: Do social groups react differently to the crisis (the war and the coming of refugees)? Do these reactions differ in the 2 countries? First, we focus on attitudes as a proxy for xenophobia and then briefly on the different forms of solidarity actions as a proxy for behaviour.

Attitudes

As described in this sub-section, we looked at 2 aspects of xenophobia. One statement was 'We must close our borders' and the other one claimed that 'Refugees are fakes'. While the former is designed to help identify respondents' *hostility*, the latter is more about *suspicion*. We use these terms when differentiating between levels of agreement with these statements.

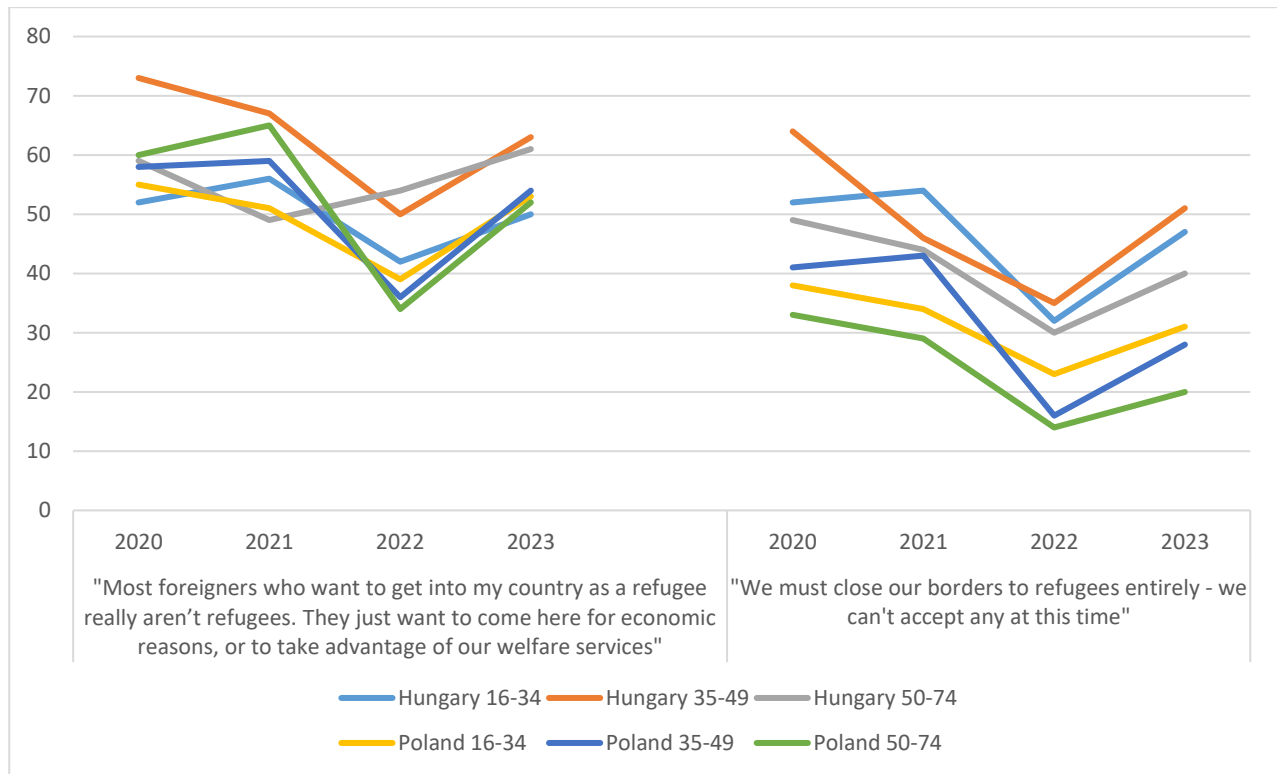
Figure 8 shows that, while males in Hungary were more suspicious than their female counterparts in 2020, the gap had almost disappeared by 2023. In relation to enmity, the gap opened up again in 2023, with males being more hostile. Previous research in Hungary on attitudes towards refugees found no significant difference between men and women (Sik and Szeitl 2016). In Poland, there was only a bigger difference in 2020 in terms of hostility but this had disappeared by 2021 – in this case, female respondents were 'stricter'.

Figure 8. The proportion of those who agree or strongly agree with the items when thinking about their country: 'Most foreigners who want to get into my country as a refugee really aren't refugees. They just want to come here for economic reasons, or to take advantage of our welfare services' and 'We must close our borders to refugees entirely – we can't accept any at this time', in Hungary and Poland, by gender, %, 2020–2023



Source: Own drawing based on data from Ipsos World Refugee Day Global Advisor Online Survey, Hungary, Poland, 2020–2023, base 500–500, adults aged 16–75; sub-sample sizes for Hungary (male–female in 2020–2023 respectively: 241–159; 234–266; 241–159; 227–274) for Poland (male–female in 2020–2023 respectively: 245–255; 245–255; 246–255; 248–254).

Figure 9. The proportion of those who agree or strongly agree with the items when thinking about their country: ‘Most foreigners who want to get into my country as a refugee really aren’t refugees. They just want to come here for economic reasons, or to take advantage of our welfare services’ and ‘We must close our borders to refugees entirely – we can’t accept any at this time’, in Hungary and Poland, by age group, %, 2020–2023



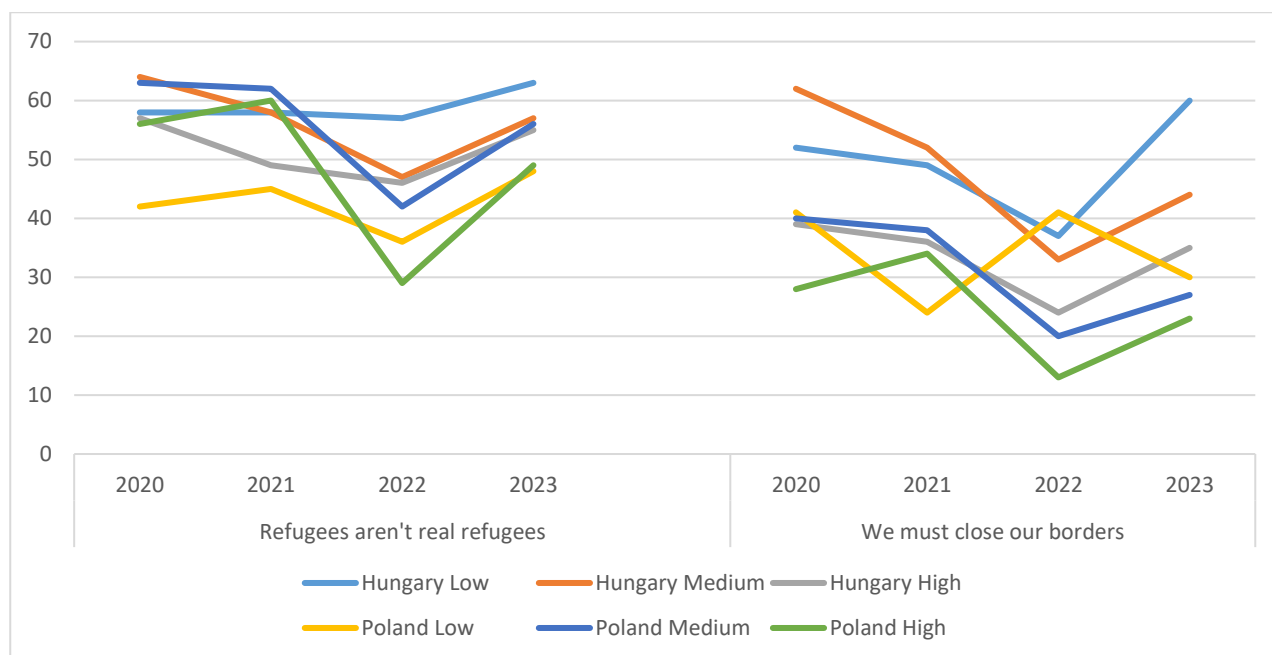
Source: Own drawing based on data from Ipsos World Refugee Day Global Advisor Online Survey, Hungary, Poland, 2020–2023, base 500–500, adults aged 16–75; sub-sample sizes for Hungary (16–34; 35–49, 50–74 in 2020–2023 respectively: 156–141–204; 156–160–185; 127–157–216; 145–164–192) for Poland (16–34; 35–49, 50–74 in 2020–2023 respectively: 174–156–170; 174–131–196; 153–148–200; 154–148–200).

Figure 9 shows that xenophobia differs more by age in Hungary than in Poland. In Hungary, the middle-aged cohort has (almost always) been the most xenophobic one and the youngest cohort the least suspicious (though still above 50 per cent), while the oldest age cohort has been the least hostile. These findings partly coincide with the results of previous research that finds that the middle-aged cohort has typically been the most xenophobic (Simonovits and Bernát 2016). The trend has not changed, which means that the crisis has not affected the feelings of the age cohorts. In Poland, however, there is no cohort which clearly stands out because the strength of feeling about these issues changes with time in both cohorts, which is not consistent with previous findings (CBOS 2022). While in 2020 and 2021, suspicion increased with age, by 2022 this relationship had almost reversed and hostility first varied across the age cohorts, before changing to a decrease in 2022. It seems that, in Poland, the 2022 refugee crisis changed the trends for the age cohorts: the oldest cohort became the least xenophobic and the youngest the most.

As it is widely accepted in the literature, we also assumed that higher levels of education (and as a close corollary, higher social status and income) are associated with greater support for refugees (Simonovits and Bernát 2016; Steele and Abdeelaty 2019). In Hungary, the level of xenophobia changed over time

within the different groups: while, in 2020 and 2021, the middle-educated were the most xenophobic, in 2022–2023, xenophobia decreased as we move from the lowest-educated to the highest-educated groups (Figure 10). In Poland, those with a mid-level education were the most suspicious throughout the years, while hostility decreased from the lowest to the highest educated – with the exception of the year 2021. We can conclude that the trends in the socio-demographic indicators are not clear-cut.

Figure 10. The proportion of those who agree or strongly agree with the items when thinking about their country: ‘Refugees aren’t real refugees’ and ‘We must close our borders to refugees entirely – we can’t accept any at this time’, in Hungary and Poland, by education, %, 2020–2023



Source: Own drawing based on data from Ipsos World Refugee Day Global Advisor Online Survey, Hungary, Poland, 2020–2023, base 500–500, adults aged 16–75; sub-sample sizes for Hungary (low-medium-high in 2020–2023 respectively: 124–281–96; 123–281–96; 97–227–176; 98–229–174) for Poland (low-medium-high in 2020–2023 respectively: 85–305–109; 85–306–109; low number–269–224; low number–273–211).

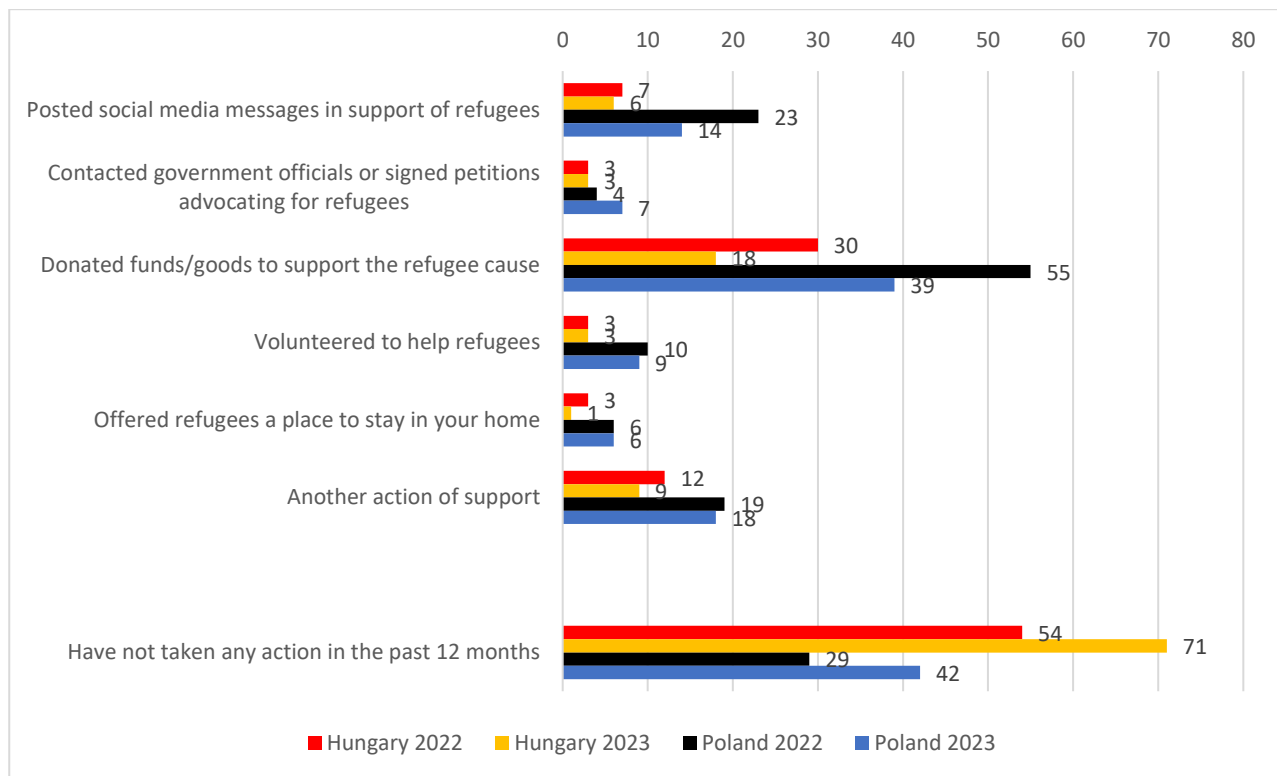
Behaviour

As Figure 11 illustrates, the proportion of those who – admittedly – did not help refugees at all in 2022 was almost twice as high in Hungary (more than half of the adult population) than in Poland (less than a third of the adult population). The level of – admitted – solidarity decreased in both countries in 2023 but the difference remained. The decreasing trend in solidarity is in line with other findings (MEDAM 2022; Nowosielska 2022; Theus 2022 for Poland, cited cited in Hargrave *et al.* 2023, and Zakariás, Feischmidt, Gerő, Morauszki, Zentai and Zsigmond 2023 for Hungary). Focusing on the different forms of assistance provided to refugees in both countries, donations were the most common form and this did not change over time. Regarding the differences between the 2 countries, as the attitudes towards refugees were more positive in Poland, the greater level of solidarity action is not surprising.

The most popular activities were the same in both countries: ‘donating funds and goods’ was the most popular, ‘another supporting action’ was second in much smaller proportions and the third, with

a more or less similar share, was 'posting on social media'. 'Volunteering to help refugees' was only popular in Poland.

Figure 11. Percentage of those who participated in various solidarity actions and of those who did not, 2022 and 2023 in Hungary and Poland (%)



Source: Own drawing based on data from Ipsos World Refugee Day Global Advisor Online Survey, Hungary, Poland, 2022–2023, base 500–500, adults aged 16–75.

Concerning the social basis of solidarity actions in the 2 countries, we found that:

- Regarding gender: in both countries, women were slightly more likely to act in both years (2022 and 2023). In Hungary, 49 and 31 per cent of women were involved in at least one form of solidarity action, versus 42 and 27 per cent of men. In Poland, the figures were 72 and 61 per cent for women versus 71 and 55 per cent for men. In both countries, the larger share for females is mainly associated with donation activity although, in Poland, volunteering is also relevant.
- Regarding the age cohorts: while in Hungary the middle-aged cohort acted the least in both years (42 and then 22 per cent), in Poland younger persons were the least active (64 and 55 per cent) (compared to 75 per cent for both in 2022 and 61 per cent for the middle-aged and 59 per cent for the oldest group in 2023). One would expect younger individuals to be more active on social media but this trend was reversed in 2022: in Poland, the middle-aged cohort was the most active in this field and in Hungary, the elderly were. Older people were more likely to donate and younger people were more likely to offer the use of their apartments.
- People with a lower level of education in both countries showed much less solidarity – in Hungary, 40 per cent in 2022 and then 20 per cent in 2023 compared to the 44 and 38 per cent of those with a mid-level education and especially the 59 and 44 per cent of those with a higher-level education;

in Poland, the figures were 59 and 42 per cent compared to 65/55 per cent and 55/64 per cent, respectively).

It is clear that solidarity with refugees is a complex phenomenon and needs to be broken down into different activities in order to identify which segments of society are the more active in different areas. In this respect, the year 2022 witnessed the overturning of some general trends.

Conclusion

In this paper, we have examined the level and trend of xenophobia in Hungary and Poland based on Ipsos data (2020, 2001, 2002, 2023). We chose these 2 countries because of their cultural, political and historical similarities as well as differences – namely, their approach to the refugee crises in 2015 and 2022. Our starting point was that (1) the level of xenophobia in Hungary has always been higher than in other European countries – including Poland; (2) the level of xenophobia in Hungary has been reinforced by the government's full-scale anti-immigrant and anti-refugee propaganda (Reményi, Glied and Pap 2023), by pressing the moral panic button several times over the last 10 years, which was not the case in Poland.

Our descriptive analysis showed that:

1. the Ukrainian refugee crisis decreased the level of xenophobia in both countries (and in Europe), but only temporarily;
2. in contrast to Hungary, where the level of xenophobia returned to its previous level in 2023, in Poland the level of xenophobia increased by 2023 but still remained below its average level;
3. in Poland, while the level of suspicion of refugees became high again in 2023, the level of hostility remained lower than before;
4. 'refugee hypocrisy' is strong in both countries: respondents differentiated between the country of origin when they were asked who should be accepted into the country in 2022 – while refugees from Afghanistan, Syria and South Sudan were much less accepted, Ukrainians were much more accepted; and
5. the level of solidarity was much higher in both countries in 2022 than in 2023 although, in Poland, people were more active than in Hungary, especially in terms of those claiming that they had helped by volunteering, donating or in any other way.

All in all, we believe that our assumptions at the descriptive level were correct: while the 2 countries have many similarities, there are differences as well. First of all, the level of xenophobia is higher in Hungary than in Poland because of the continuous anti-refugee and anti-migrant government propaganda campaign and second, the inertia of xenophobia is also likely to remain higher in Hungary due to a mix of political, historical and cultural effects

The limitations of the study are the following. All surveys that address attitudes towards refugees may over-represent positive answers since the focus is on the group in question and respondents may express different sentiments but not dare to share them honestly.

Notes

1. Technical notes on the Ipsos survey results used in this paper:

2020: This survey is an international sample of 17,997 adults: those aged 18–64 in the US, South Africa, Turkey and Canada and aged 16–64 in all other countries were interviewed. The fieldwork was conducted from 22 May–5 June 2020. Approximately 1,000+ individuals participated on a country-by-country basis via the Ipsos Online Panel with the exception of Argentina, Belgium, Chile, Hungary, India, Malaysia, Mexico, the Netherlands, Peru, Poland, Russia, Saudi Arabia, South Africa, South Korea, Sweden and Turkey, each with a sample of approximately 500+. The precision of Ipsos online polls is calculated using a credibility interval with a poll of 1,000 accurate to +/- 3.1 percentage points and of 500 accurate to +/- 4.5 percentage points. For more information on the Ipsos use of credibility intervals, please visit the Ipsos website. Data are weighted to match the profile of the population.

<https://www.ipsos.com/sites/default/files/ct/news/documents/2020-06/2020-world-refugee-day-ipsos.pdf>.

2021: These are the results of a 28-market survey conducted by Ipsos on its Global Advisor online platform. Ipsos interviewed a total of 19,510 adults aged 18–74 in the US, Canada, Malaysia, South Africa, and Turkey and aged 16–74 in 23 other markets between Friday 21 May and Friday 4 June 2021. The sample consists of approximately 1,000 individuals each in Australia, Belgium, Canada, mainland China, France, Germany, Great Britain, Italy, Japan, Spain and the US and 500 individuals each in Argentina, Chile, Colombia, Hungary, India, Malaysia, Mexico, the Netherlands, Peru, Poland, Russia, Saudi Arabia, South Africa, South Korea, Sweden and Turkey. The samples in the examined countries can be taken as representative of their general adult populations under the age of 75. The data are weighted so that each country's sample composition best reflects the demographic profile of the adult population according to the most recent census data.

https://www.ipsos.com/sites/default/files/ct/news/documents/2021-06/Ipsos%20World%20Refugee%20Day%202021%20report_1.pdf.

2022: The original survey was a 28-country survey conducted by Ipsos on its Global Advisor online platform. Ipsos interviewed a total of 20,505 adults aged 18–74 in the US, Canada, Malaysia, South Africa and Turkey and 16–74 in 23 other countries between 22 April and 6 May 2022. The sample consists of approximately 1,000 individuals in each of Australia, Brazil, Canada, mainland China, France, Germany, Great Britain, Italy, Japan, Spain and the US and 500 individuals in each of Argentina, Belgium, Chile, Colombia, Hungary, India, Malaysia, Mexico, the Netherlands, Peru, Poland, Saudi Arabia, South Africa, South Korea, Sweden, Switzerland and Turkey. The samples in the examined countries can be taken as representative of their general adult populations under the age of 75. The data are weighted so that each country's sample composition best reflects the demographic profile of the adult population according to the most recent census data.

https://www.ipsos.com/sites/default/files/ct/news/documents/2022-06/Ipsos%20World%20Refugee%20Day%202022%20Global%20Survey%20Graphic%20Report%20-%20Pt%201_0.pdf.

2023: The fieldwork was done between 21 April and 5 May 2023. For this survey, Ipsos interviewed a total of 21,816 adults aged 18 years and older in India, 18–74 in Canada, Malaysia, New Zealand, South Africa, Turkey and the US, 20–74 in Thailand, 21–74 in Indonesia and Singapore and 16–74 in all other countries. The sample consists of approximately 1,000 individuals each in Argentina, Australia, Brazil, Canada, France, Germany, Great Britain, Italy, Japan, Mexico, New Zealand, Spain and the US and 500 individuals each in Belgium, Chile, Colombia, Hungary, Indonesia, Malaysia, the Netherlands, Peru, Poland, Singapore, South Africa, South Korea, Sweden, Thailand and Turkey. Samples in Hungary and Poland can be considered representative of their general adult populations under the age of 75. The survey results for these countries should be seen as reflecting the views of the more ‘connected’ segment of their population. The data are weighted so that the composition of each country’s sample best reflects the demographic profile of the adult population according to the most recent census data.

<https://www.ipsos.com/sites/default/files/ct/news/documents/2023-06/ipsos-global-advisor-world-refugee-day-2023-full-report.pdf>.

2. We would like to thank Ipsos for the data we received via electronic correspondence.
3. Ipsos was responsible for the design of the survey, the fieldwork and the production of the survey data only. The analysis, interpretation and reporting within this paper are the sole responsibility of the authors.
4. ‘We call “thinkers” those respondents who selected the item: “It depends...”, i.e. they express a need for more information before making their decision and are inclined to evaluate the pros and the cons’ (Sik 2016: 41).
5. The moral panic button (MPB) has been the core propaganda machine of the Hungarian government since 2015 (Sik 2016). This is a technology combining media manipulation and push-polls to create fear from foreign enemies (first of all migrants who are used by a world-wide leftist/liberal elite) who seek to destroy the sovereignty of Hungary. The pressing of this button by government authorities aims to convince the population that only the ruling Fidesz government can defend them from these dangers.
6. We received only the excel tables but not the original datafiles.
7. According to the World Value Survey (WVS), both Hungary and Poland belong to the Catholic Europe group; however, in the 1990s and, in recent years, only at its fringe and far from each other, with Hungary having more secular and survival values and Poland more traditional and self-expressive values (Figure 1 and 2 in Annex 2).
8. The wording of the three questions was as follows: ‘People should be able to take refuge in other countries, including in [COUNTRY], to escape from war or persecution’; ‘Most foreigners who want to get into my country as a refugee really aren’t refugees. They just want to come here for economic reasons or to take advantage of our welfare services’; and ‘We must close our borders to refugees entirely – we can’t accept any at this time’. The figures cover those who agree or fully agree with the items.

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Conflict of interest statement

No conflict of interest reported by the authors.

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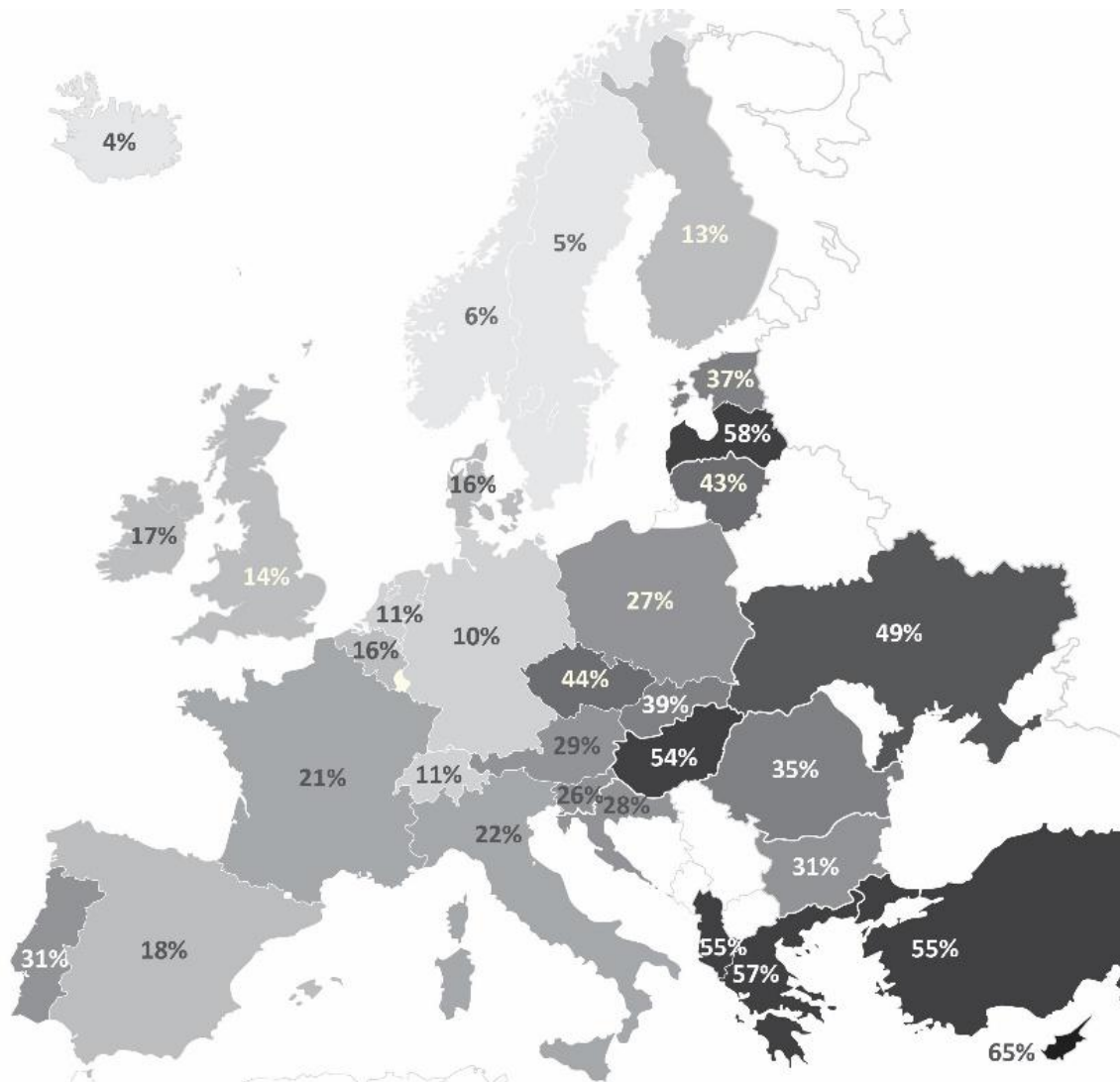
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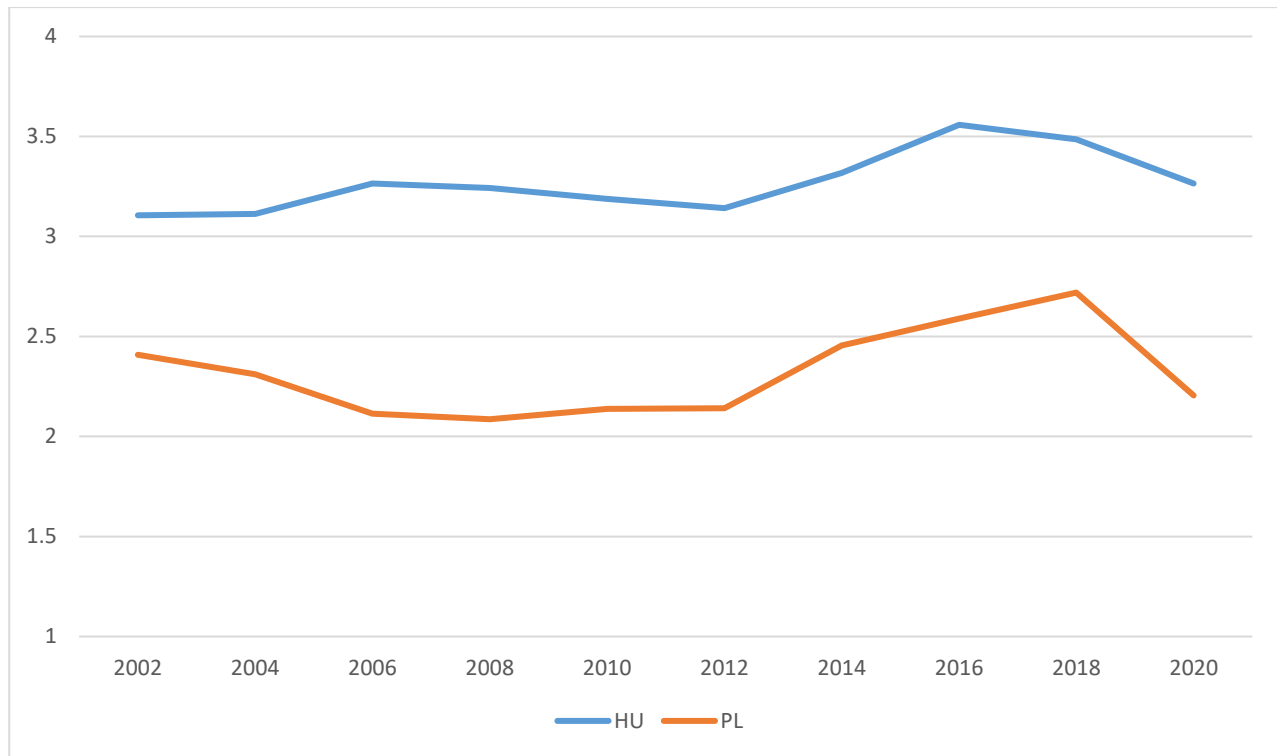
Annex 1

Map 1. The heat map of prejudice and welfare chauvinism



Source: In the mid-2010s (ESS 8).

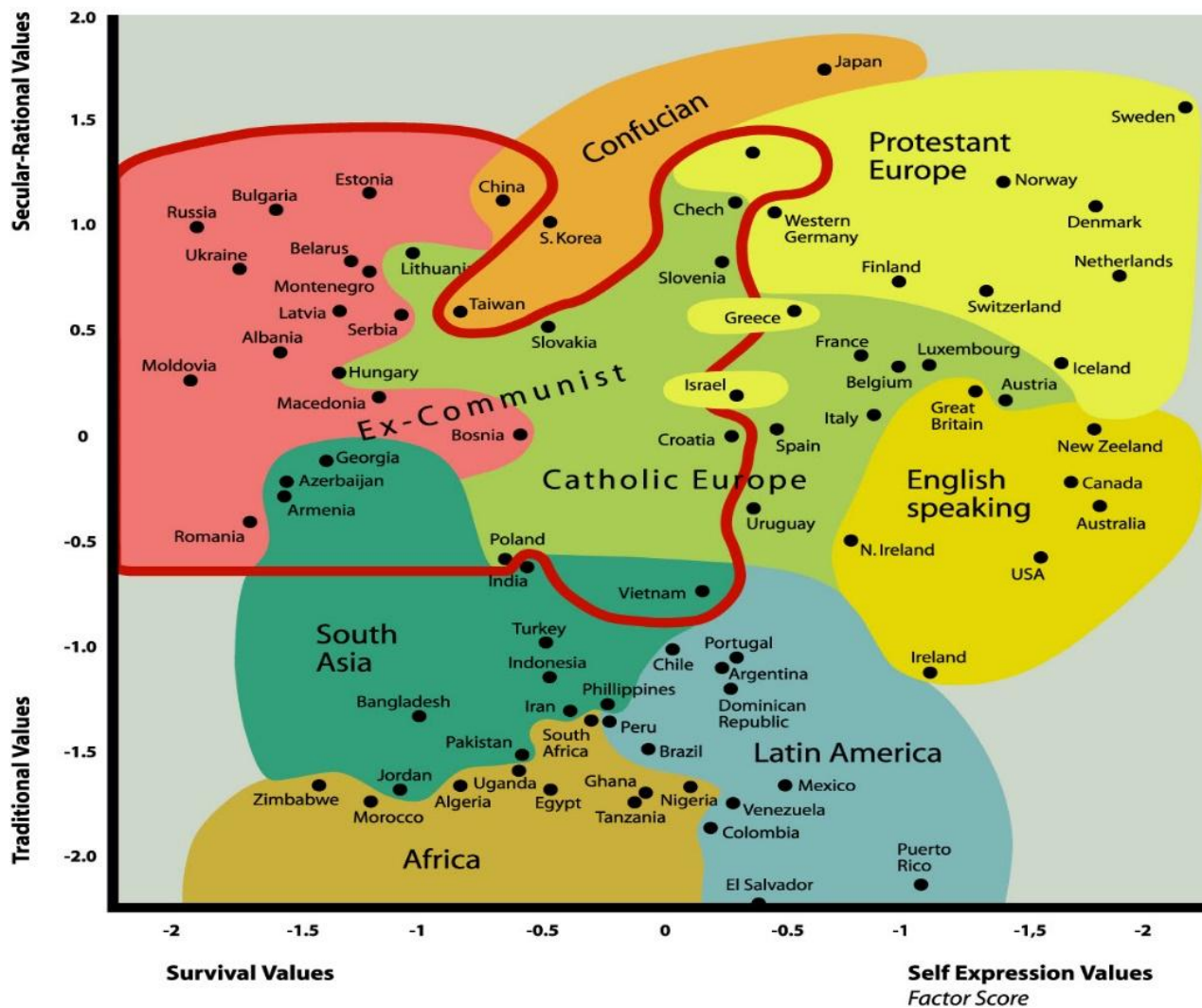
http://derexindex.eu/images/download/map_derex_cat1_prejudices_and_welfare_chauvinism_20180130.jpg.

Figure 1. Indicator of rejection in Hungary and Poland (average, 2002–2020, %)

Source: Authors' own elaboration. Mean values of responses to the question: 'To what extent do you think [country] should allow people from the poorer countries outside Europe to come and live here?' Scale: 1 (allow many) to 4 (allow none).

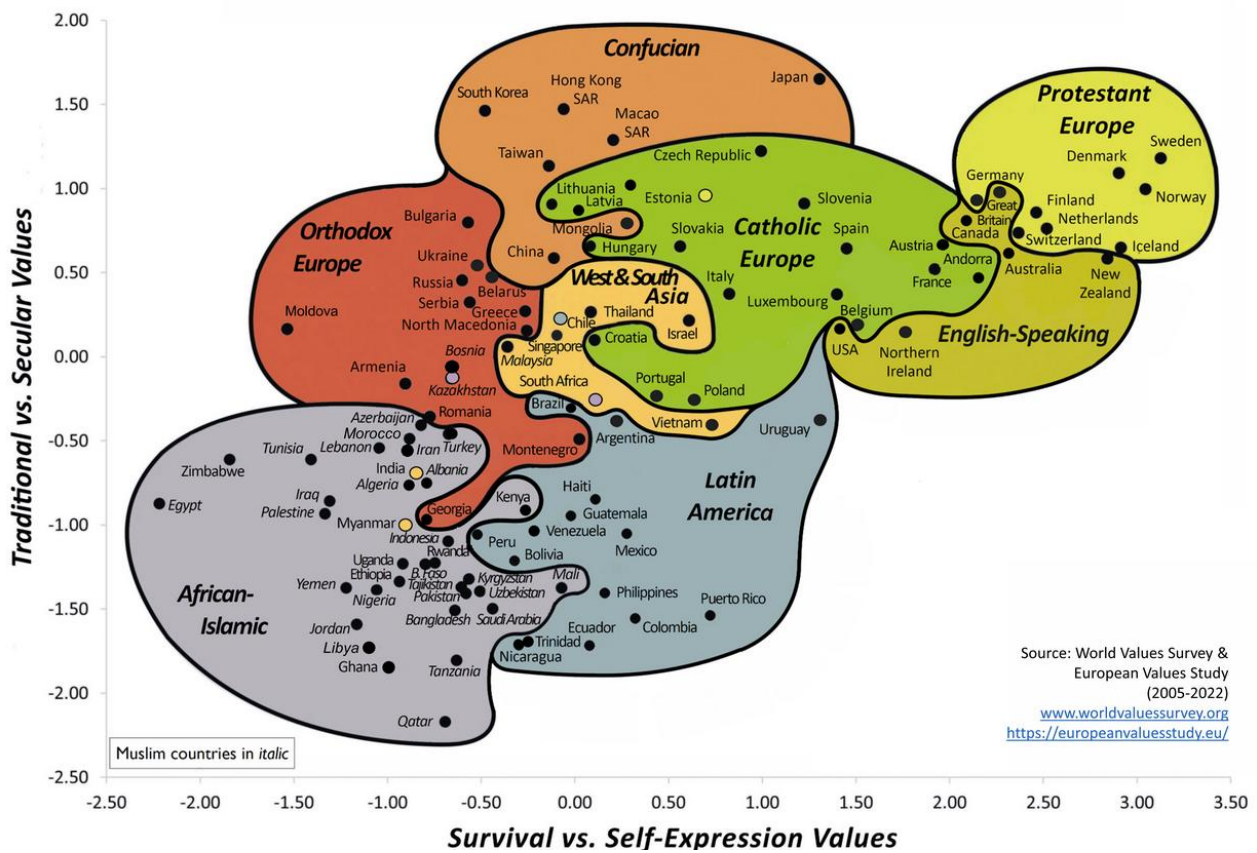
Annex 2

Figure 1. Two WVS maps on the characteristics of value system in Hungary and Poland



Source: World Value Survey 2023, 1996, https://www.worldvaluessurvey.org/images/Cultural_map_WVS4_1996.jpg.

Figure 2. The Inglehart-Welzel World Cultural Map 2023



Source: World Value Survey 2023, 2017–2022, <https://www.worldvaluessurvey.org/images/Map2023NEW.png>.

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The (Un)Changing Language and Sentiment Associated with the Moral Panic Button (MPB) in the Wake of the Russian–Ukrainian War: The Hungarian Case

Tamás Varga*, Zsófia Rakovics**, Endre Sik***

In Hungary, several studies have analysed how migration was framed following the events of 2015. In this paper, given the distinct characteristics of the Ukrainian refugee crisis, we investigate whether the Moral Panic Button (MPB) altered its language when referring to individuals arriving from Ukraine, compared to those from elsewhere. Content-wise, we raised 2 questions: Is it true that, after the outbreak of the war, in the framing of pro-government media, the refugee label once again became the majority term instead of the unofficial migrant, in contrast to the non-MPB-operated non-government media? Is it true that this shift was somewhat limited due to the continued presence in Hungary of migration waves, primarily originating from the Middle East and Africa? To address the research questions, we utilised 2 special datasets comprising articles and Facebook posts both before and after 24 February 2022. On the one hand, we analysed the occurrence of the terms ‘migrant’ and ‘refugee’ separately for articles and Facebook posts, distinguishing between non-governmental and pro-governmental outlets. Additionally, through sentiment analysis, we sought to investigate the attitudes and emotional responses associated with key terms related to the war. Our results imply that the pro-government media in Hungary adapted its labelling and emotional framing of displaced persons significantly around the outbreak of the Russian–Ukrainian war. Whereas this shift reflected a rapid and strategic language change in the short term, especially in contrast to non-government media, the long-term trend shows a gradual return to the earlier pattern.

Keywords: migrant, refugee, Moral Panic Button, Hungary, Ukraine

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Introduction

The Russian invasion of Ukraine on 24 February 2022 significantly influenced the political stance and rhetoric of the Hungarian government. On the one hand, the government welcomed displaced individuals, although the existing legislation was a major obstacle since it forbade almost any form of entry to Hungary as an asylum-seeker (Gerő, Pokorny, Sik and Surányi 2023). Moreover, the Hungarian government had no clear approach to the war. Although most EU sanctions were accepted by the government, a communication campaign against the same measures was launched simultaneously (Annex: picture 13, in: Sik and Krekó 2025, in this section) and the statements of leading politicians and Fidesz propagandists blamed the West for the outbreak of the war. According to a contemporary media research study, this pattern had already been observable (Göncz, Lengyel and Ilonszki 2024). Thus, 2 opposing discourses were present: the first which leaned towards integration and was based on European values prevalent in non-governmental media and another government discourse emphasising national sovereignty, Christian-based cultural identity and the importance of the nation and family, in which the European Union was more or less rejected.

In this context, a recent study on media framing indicates that Hungarian media content during the period was largely shaped by government-driven narratives (Bocskor 2024). Pro-government outlets transmitted these unaltered, often through editorials or loyal experts echoing official rhetoric. Dominant themes included EU ineffectiveness, sanctions-related economic hardship, migration and sovereignty concerns and civilisational divides between East and West. The 'Eastern opening' policy also remained present despite the war. Non-governmental media mostly reacted to these narratives without articulating autonomous alternatives.

In this study, we first introduce the intertwined theories (the informational autocracy and the Moral Panic Button) which are the core of our treatise and give a brief overview of the framing basis of the forthcoming analysis. Second, using a special dataset that focuses on articles published before and after 24 February 2022, we identified the reactions in the pro- and non-government media regarding the war, with a special focus on labelling. We assumed that the Fidesz-operated MPB had to change its language regarding those coming from Ukraine compared to those from elsewhere, since the Ukrainian refugee crisis is unsuitable for fear-mongering. Factors contributing to this divergence include the pre-existing patterns of Ukrainian labour migration to Hungary and the cultural similarities between the 2 populations, such as shared characteristics in terms of skin colour and religion (Gerő *et al.* 2023: 8). Finally, we used a different dataset to analyse the (un)changing trends of the sentiments in the online media both before and after 24 February 2022. In the context of sentiment analysis, our research question focused on whether or not the war altered attitudes towards displaced individuals. We examined the issue within the entire media coverage, as well as within the pro- and non-government media, paying attention to the operation of the MPB in the case of the latter.

Informational autocracy (IA), the Moral Panic Button (MPB) and the framing basis of propaganda

According to the original concept (Guriev and Treisman 2020), informational autocracies are lookalike democracies in which professionally and continuously manipulated public opinion is a relevant element of the fear- or crisis-mongering power game. The Hungarian model of information autocracy, while emphasising governmental competence, extensively and intensively employs various ideological narratives at both domestic and international levels (Enyedi 2023; Krekó and Enyedi 2018). These

narratives are strategically utilised to generate and sustain moral panics, thereby reinforcing the regime's legitimacy.

The concept of moral panic traces its origins to Stanley Cohen (1972). Endre Sik and Márton Gerő summarised the essence of the moral panic as follows:

...during a moral panic, an event with some kind of kernel of reality is distorted and magnified by the media in such a way that the original, usually one-time event is exaggerated, treated as a general trend, and presented to the majority society in such a way that they feel that it threatens the existence of their world (Sik and Gerő 2022: 66).

The media's simplistic, often tabloid-style explanations play a pivotal role in identifying threats and target groups, as well as in narrowing the scope of problems and potential solutions. Such reductive portrayals not only amplify the perceived magnitude of the threat but also heighten public expectations of immediate and forceful responses from authorities (Bernáth and Messing 2015: 8).

Moral panic can be initiated through 2 primary mechanisms: bottom-up or top-down processes (Lázár and Sik 2019: 15). In the bottom-up scenario, the panic originates from the grassroots level, often sparked by rumours or gossip, which then escalates local concerns into broader societal anxieties. Conversely, a top-down, elite-engineered moral panic is orchestrated by influential figures or groups within the elite, who may exploit such panics for ideological purposes or to further their material interests. In this regard, the Moral Panic Button can be seen as a special version of Cohen's top-to-bottom, elite-engineered moral panic – or as a professional propaganda technology operated by the actual government (Sik 2016).

The MPB fuels panic using a complex and sophisticated propaganda machine which simulates seemingly life-or-death threats to the nation (i.e. continuously recreating crises by fear-mongering). It also identifies the wrongdoer(s), who can be blamed. To achieve these goals, the MPB develops a specific language to reinforce the narratives favoured by the government and intensify social polarisation. Since Sik and Krekó (2025, in this section) summarise the history and operation of the MPB in Hungary through a selection of examples, in this subsection, we focus only on its language and, especially, its technique of labelling. This analysis will shed light on how the MPB's language functions to categorise and frame issues in ways that reinforce the government's narrative.

To understand the labelling technology used by MPB, first, we must become familiar with the concept of framing, which is not only 'fragmented' but has never been unified from the outset, as Robert M. Entman (1993) asserts.

Entman himself endeavoured to offer a comprehensive definition of 'framing' that would reconcile the various interpretations of the term across different disciplines within the context of communication. According to him, 'Frames highlight some bits of information about an item that is the subject of a communication, thereby elevating them in salience. The word salience itself needs to be defined: It means making a piece of information more noticeable, meaningful, or memorable to audiences' (Entman 1993: 52). Overall, it seems to have emerged independently in at least 2 distinct fields, developed by separate researchers. For example, in sociology and related disciplines, the concept of frames traces its origins to Goffman's (1974) seminal work *Frame Analysis*. In the field of artificial intelligence, the term 'frame' was introduced by mathematician and computer scientist Minsky (1974), who used it to describe a data structure representing a stereotyped situation. In psychology, Kahneman and Tversky (1984) argue that framing refers to the way in which the presentation of information can significantly influence

decision-making. They demonstrated that people's choices vary depending on whether a situation is framed in terms of potential gains or potential losses.

The term 'framing' is employed across numerous disciplines. The essential point is that 'while the focus on – and the exact definition of – what a frame is does differ across disciplines, the fundamental characteristic of a frame as a means of structuring and organising the world around us via stable cognitive representations can be regarded as a common feature' (Benczes and Benczes 2018: 432). Our research adopts a sociological approach to the concept of framing. The theory of framing suggests that media content is shaped by the influence of political and business elites, who control its production, whereas ordinary individuals, lacking resources, power and communication expertise, interact with it primarily as consumers. This dynamic allows elites to shape media narratives, ensuring that messages – particularly news – are presented within interpretive frames. These frames selectively emphasise certain elements of events while marginalising others, thus distorting the original context (Bajomi-Lázár 2017: 69).

This mechanism is closely linked to the media critique developed by Chomsky and Herman (2016[1988]). In their approach, framing refers to the process by which journalists, influenced by power dynamics, employ a unified framework in news communication. This involves not only the strategic positioning of news content but also the construction of a subjective interpretive framework – a distinct discursive alternative – which, over time, becomes integrated into the value systems of media consumers. This mechanism indirectly shapes consumers' narratives about the world (Boldog 2016: 196). Government forces that influence the media play a pivotal role in shaping public opinion. This influence is amplified by the concentration of media ownership and journalists' frequent reliance on official sources.

In the present case, the first, though (since propaganda may intentionally conceal its underlying message) often unrecognisable component of every framing effort in the media relates to terms – such as 'immigrant', 'migrant' and 'refugee' – which articles use to label people crossing the border (Benczes and Ságvári 2022: 415; Sik and Simonovits 2019: 22). The chosen label(s) align(s) closely with the context of their use, the environment in which they appear and the characteristics or actions associated with the group they describe.

A substantial body of literature examines media framing associated with migration, encompassing label selection and in-depth contextual analysis, with examples drawn from various countries. Numerous studies on the general framing of immigration have identified similar patterns in news coverage across different countries and media systems. Regardless of the language or country being examined, the metaphors display little variation and seem to draw from a set of metaphorical frames, such as crime or welfare chauvinism (Cisneros 2008). Harris and Gruenewald (2020) analysed the largest national newspapers in the USA from 1990 to 2013. In their study, they employed time-series trend analyses to investigate the prevalence of the various media frames used to explain the immigration–crime relationship. Their analysis revealed that immigration–crime news narratives predominantly portray immigrants as particularly prone to criminal behaviour or as contributing to rising crime rates. Over time, such framing has grown more prevalent, with increasing mischaracterisations of undocumented immigration as inherently criminal.

Bos, Lecheler, Mewafi and Vliegthart (2016) examined the framing of immigration in the Netherlands, aiming to test Entman's theory regarding how the variability in issue or event presentation affects opinions, attitudes and behaviours. Their study focused on 3 frames: emancipatory, multicultural and victimisation.. The findings revealed that the emancipatory frames of the stories influence attitudes toward immigrants and intercultural behavioural intentions: the multicultural frame fosters positive

effects, while the victimisation frame generates negative effects, irrespective of the story's valence. Similar trends were observed in Belgium. Van Gorp (2005) analysed 8 Belgian newspapers from 2000 to 2003 and found that people affected by displacement were depicted either as 'victims' or as 'intruders'. The victim frame portrayed these groups as poor, helpless individuals who were unable to change their circumstances and were often seen as inferior and incapable. In contrast, the intruder frame depicted them as dangerous and posing a cultural and economic threat. Other studies have generally found a more negative framing of immigration, with news coverage primarily emphasising security (e.g. Islam as a threat) and economic consequences, while discussions of cultural impacts were less prevalent (Caviedes 2015; Fengler, Bastian, Brinkmann, Zappe, Tatah, Andindilile, Assefa, Chibita, Mbaine and Obonyo 2020).

The case of Hungary, where migration is frequently associated with terrorism or crime, is often used to incite fear, aligning with international trends (CRB 2018: 43). This approach is characterised by its deterministic and direct nature. In Hungarian online media, the link between 'migrants and crime' or 'migrants and terror' is rarely presented through explicit causal claims (e.g., 'migrants cause an increase in crime'). Instead, propagandists rely on weaker logical associations, such as implying stigma through statements like: 'If the person is a *migrant*, then he is a criminal/dirty/infected' (CRB 2018: 44). Emphasising themes of terror and violence inherently heightens fear, fosters uncertainty and undermines citizens' trust in the modern state. From a propaganda perspective, such as that of the MPB, this approach reinforces a securitisation narrative, often culminating in the assertion that only the ruling government can safeguard the populace. Another comprehensive analysis was undertaken in the context of Hungary to examine the metaphorical framing of the label 'migrant' in the same year (Tóth, Csátár and Majoros 2018). The finding was that the most prominent metaphors conceptualising the migration crisis in the Hungarian online press were rooted in the following source domains: flood, war, object, press/burden, animal and building.

In the research mentioned above, which specifically addresses immigration, previous content analyses have either typically employed a broad category of actors, consolidating immigrants, refugees and asylum-seekers under a single label (Van Gorp 2015) or have focused on a singular label (CRB 2018; Tóth *et al.* 2018). These broad categories offer limited insight into the distinctions between the various actors featured in immigration-related news because each label evokes distinct associations, rooted in the varying (often metaphorical) conceptualisations conveyed by the terms.

The terms 'asylum-seeker' and 'refugee' are official and legal terms that refer to specific categories of people. At the international level, 'refugee' status is defined by the 1951 Geneva Convention, which describes a refugee as an individual who, 'owing to a well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group or political opinion, is outside the country of his nationality and is unable or, owing to such fear, is unwilling to avail himself of the protection of that country' or to return to it, while the term 'immigrant' applies to a person who 'establishes his or her usual residence in the territory of a Member State for a period that is or is expected to be of at least 12 months, having previously been usually resident in another Member State or a third country' (Torkington and Ribeiro 2019: 26). According to the principle of non-refoulement, refugees cannot be deported to countries where their lives would be at risk. In contrast, asylum-seekers do not automatically enjoy this international protection; they seek recognition as refugees in order to apply for asylum (Verleyen and Beckers 2023: 730).

Research that distinguishes between migrants and refugees has defined and differentiated these groups based on factors such as agency, economic costs, length of stay and type of threat. In Canada, Lawlor and Tolley (2017) found that migrants and refugees were framed differently in the media. Their

study revealed a more negative tone in the news coverage of refugees compared to migrants, with migrants being assessed more in terms of their economic contributions.

In Hungary, the term ‘migrant’ is a relatively recent addition to public discourse, emerging prominently in the aftermath of 2015. Unlike the labels ‘immigrant’ and ‘refugee’, it lacks official recognition and formal definition (Benczes and Ságvári 2022: 415). From the perspective of the MPB, the most significant distinction lies in the emotional stakes: while the term ‘refugee’ elicits solidarity, compassion and a willingness to assist, the term ‘migrant’, being a foreign word for Hungarians, fails to evoke any sense of community compassion or solidarity. If we focus solely on the prevalence of the labelling (Sik and Simonovits 2019: 23), we can conclude that, in 2015, the term ‘refugee’ experienced its first notable decline in usage, coinciding with a sharp rise in the prevalence of the terms ‘immigration’ and ‘immigrant’. A second decline in the use of ‘refugee’ occurred in July 2015, alongside a decrease in the use of the term ‘migration’. By 2016 and 2017, the terms ‘immigration’, ‘immigrant’ and ‘migration’ began to supplant ‘refugee’, while the term ‘migrant’ saw a significant increase in usage. By the end of the period, various forms of ‘migration’ had largely replaced ‘refugee’.

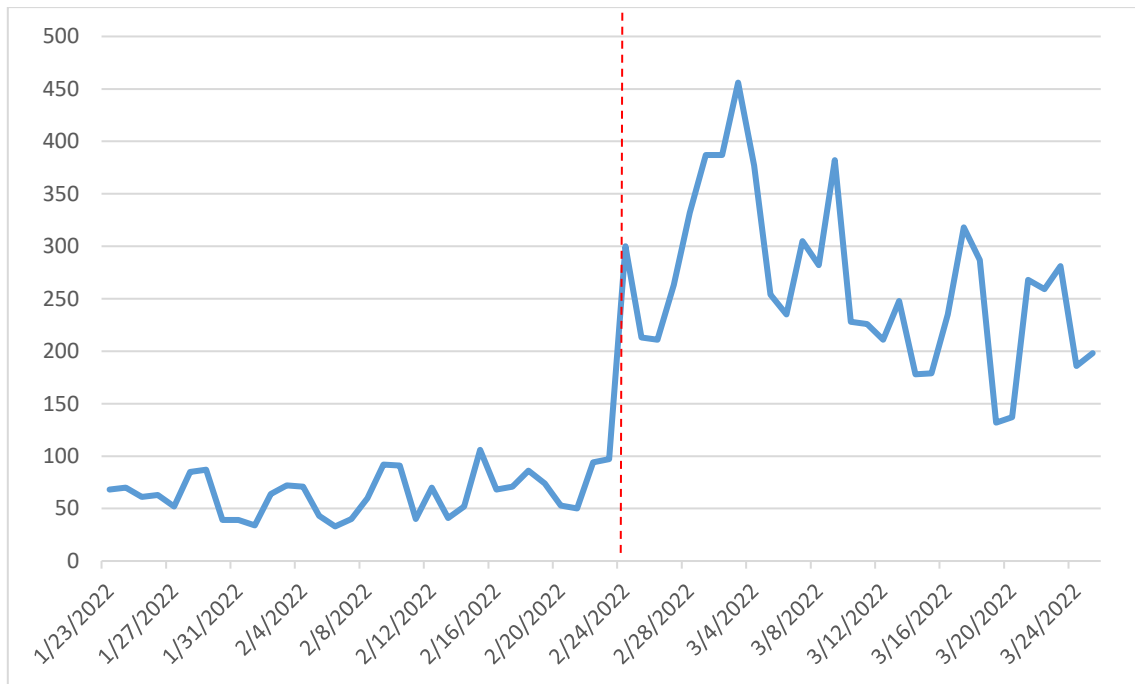
‘Migrant’ versus ‘refugee’: The ‘(un)changing’ pattern of labelling

This study examines the frequency of labels and, rather than focusing on the specific context, seeks to analyse framing in terms of emotional content, attitude and approach through the use of sentiment analysis.

To analyse the labelling trend of online media, we created a database containing articles and posts, both downloaded with the help of a social listening tool operated by SentiOne. The keywords used to identify which content to download were: ‘immigrant’, ‘migrant’, ‘refugee’, ‘asylum-seeker’ and ‘settlement permit’. The dataset included 169,516 articles and 69,755 posts from 1 January 2022 to 18 October 2023.¹

The preliminary selection of the media outlets was based on ‘visibility’ (i.e., traffic rank of the site compared to all other sites): we selected those websites that ranked higher than the 1,000th place (the source was similarweb.com). The second selection criterion was a minimum number of articles: 300 in the case of non-government and 500 in the case of pro-government media.² The advantage of this double selection process is that it produces a selection of migration-related articles with the largest potential readership. Concerning Facebook posts, we applied a similar method to that used for online media. In the examination of the most-visited Facebook pages, we defined a minimum number of followers (N=10,000).³

As Figure 1 shows, the war significantly increased the aggregated number of migration-related articles and posts – i.e. the latter became a ‘hot topic’ and not only temporarily.

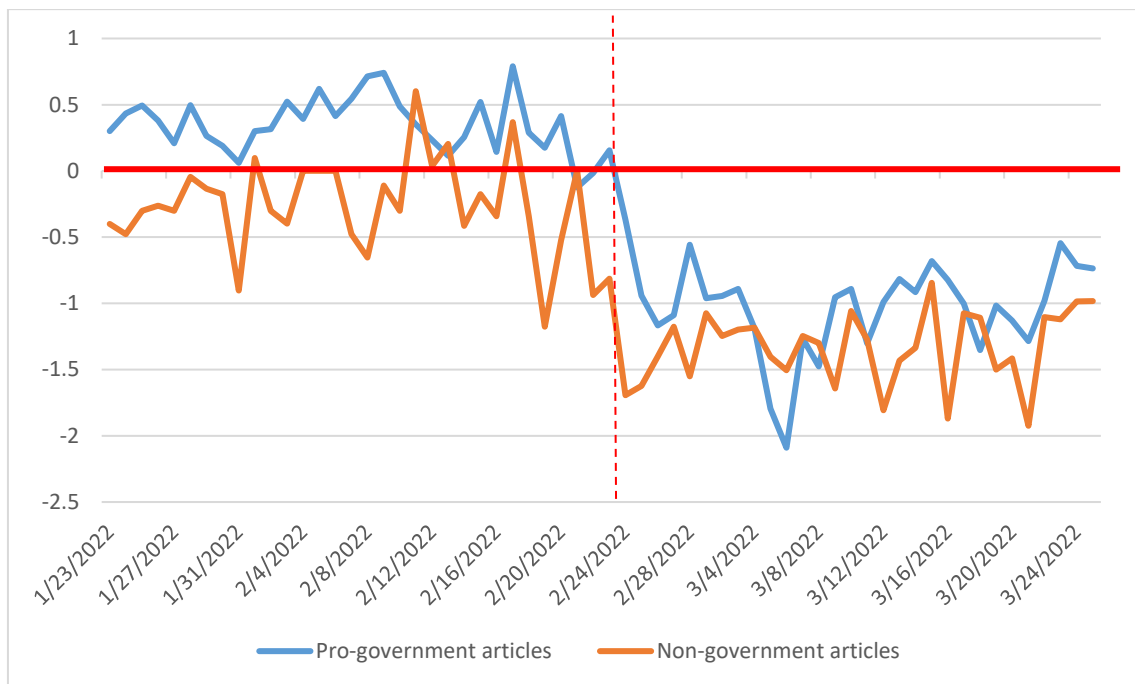
Figure 1. The total number of the articles/posts between 23 January and 25 March 2022*

Source: Own calculation. * The vertical dashed line marks the outbreak of the war (24 February 2022).

To answer the 2 questions raised at the beginning, we first had to identify ‘MPB language’ and then operationalise it in our corpus. Accepting Rakovics and Boda’s (2025, in this section) and Surányi and Bognár’s (2025, in this section) argumentation in this special section, we used the concept of labelling as the identification of MPB-sensitive language. While the ‘*menekült*’ (refugee) is an official (and legal) term used to refer to specific categories of people, the word ‘*migráns*’ (migrant) is a newcomer in the Hungarian public discourse, with strong and negative emotional associations.

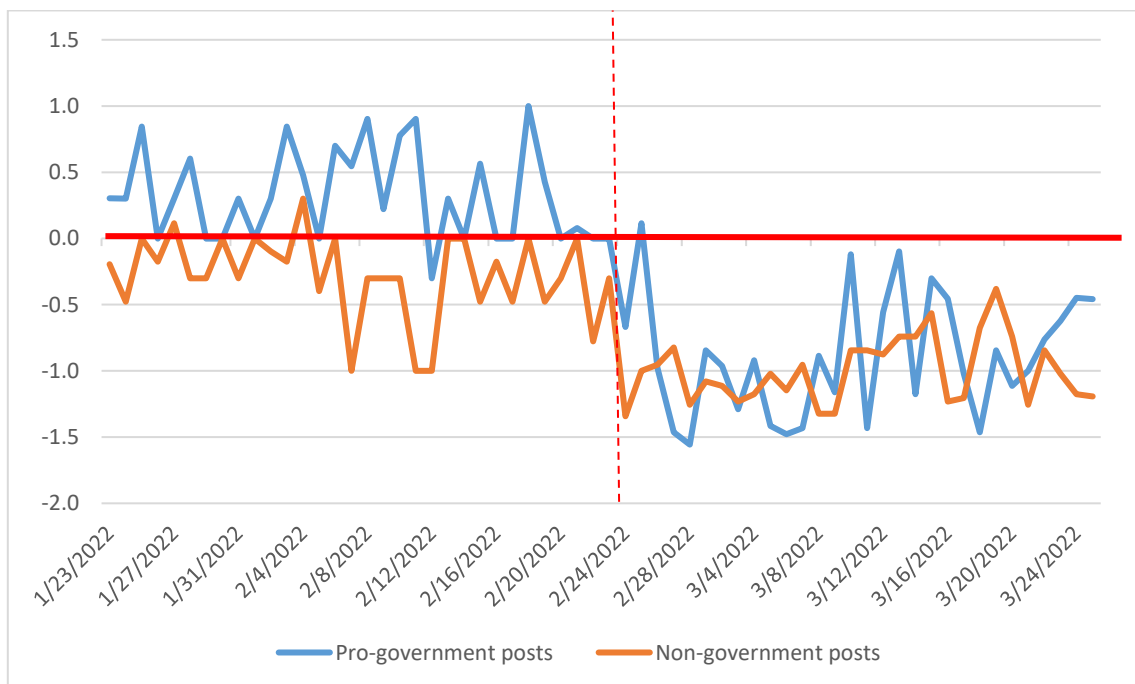
Next, we created an index that shows the proportion of uses of the term ‘migrant’, which was compared to that for the term ‘refugee’ (Figures 2 and 3). Since there were large outliers in the data, to make the figures readable we used the logarithm (10th) of the original data. If the ratio is above ‘0’, on the given day, the term ‘migrant’ was more frequently used than ‘refugee’ and, when the value is below ‘0’, the term ‘refugee’ is used more frequently. Regarding the articles (Figure 2), we found that (1) in the pre-war period, MPB-dominated pro-government media used the term ‘migrant’ more often than ‘refugee’ and (2) this was not the case with the non-government media. After the war broke out (3) the use of the term ‘migrant’ in both segments declined significantly but (4) especially in the pro-government media. Similar trends can be observed in the case of Facebook posts (Figure 3).

Figure 2. Ratio of ‘migrant’ to ‘refugee’ labels in pro- and non-government articles between 23 January and 25 March 2022*



Source: Own calculation. * The red line indicates the baseline value (when the number of the 2 labels is the same). The vertical dashed line marks the outbreak of the war (24 February 2022).

Figure 3. Ratio of ‘migrant’ to ‘refugee’ labels in pro- and non-government posts between 23 January and 25 March 2022*

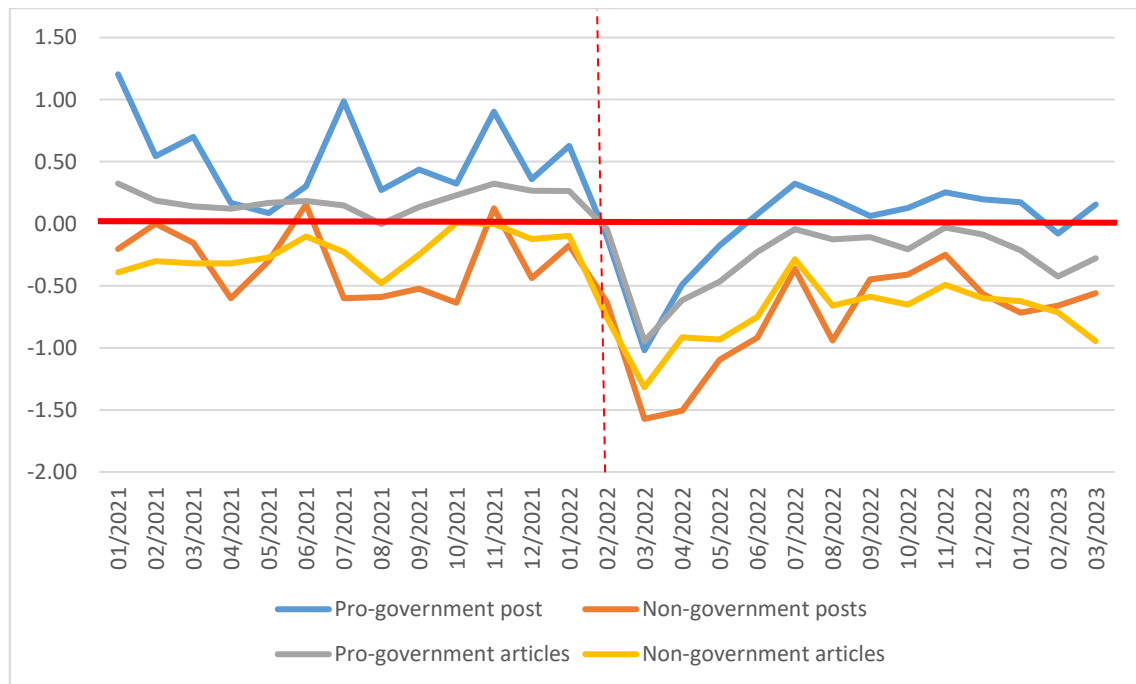


Source: Own calculation. * The red line indicates the baseline value (when the number of the 2 labels is the same). The vertical dashed line marks the outbreak of the war (24 February 2022).

Figure 2 shows that, in the pro-government media, this process started approximately 3–4 days before 24 February 2022 when the Minister of National Defence was already talking about sending soldiers to the border, since ‘the soldiers must prepare for the arrival of those who have fled their homes at the borders, as well as for humanitarian tasks’.⁴

Extending our analysis to 26 months⁵ (a year before and after 24 February 2022), we calculated the ratio of the use of the terms ‘migrant’/‘refugee’ for each month (Figure 4).

Figure 4. Ratio of ‘migrant’ to ‘refugee’ labels in pro- and non-government articles and posts between January 2021 and March 2023*



Source: Own calculation. * The red line indicates the baseline value (when the number of the 2 labels is the same). The vertical dashed line marks the month of the outbreak of the war (February 2022).

Figure 4 shows that, before the outbreak of the war, the frequency of use of the term ‘migrant’ was much higher than that of ‘refugee’. This was especially the case in some periods in the pro-government media. For example, in the summer of 2021, the MPB was pressed (Annex: picture XI, in: Sik and Krekó 2025, in this section) in the form of a national consultation entitled ‘Life after the epidemic’, which again used the issue of migration, closely linked with György Soros (see Sik and Krekó 2025, in this section, the emoji in Picture 1). Three out of the 14 questions in this push poll were related to the dangers of migration (with Soros claimed to be in the background⁶). The small increase in the index in June and September 2021 (i.e., at the beginning and the end – with a victory campaign – of the pressing of the MPB) may be related to that national consultation.

The turning point of the index is not February and March 2022, when the frequency of use of the term ‘refugee’ reached its peak. From this point on, the word ‘refugee’ was used more frequently in the pro-government media for a year but, for a short time (March–December 2022), there was a new increase in the use of the ‘migrant’ label. This might lead to the conclusion that the MPB was still ready to use the ‘undeserving refugee’ narrative whenever needed to strengthen informational autocracy.

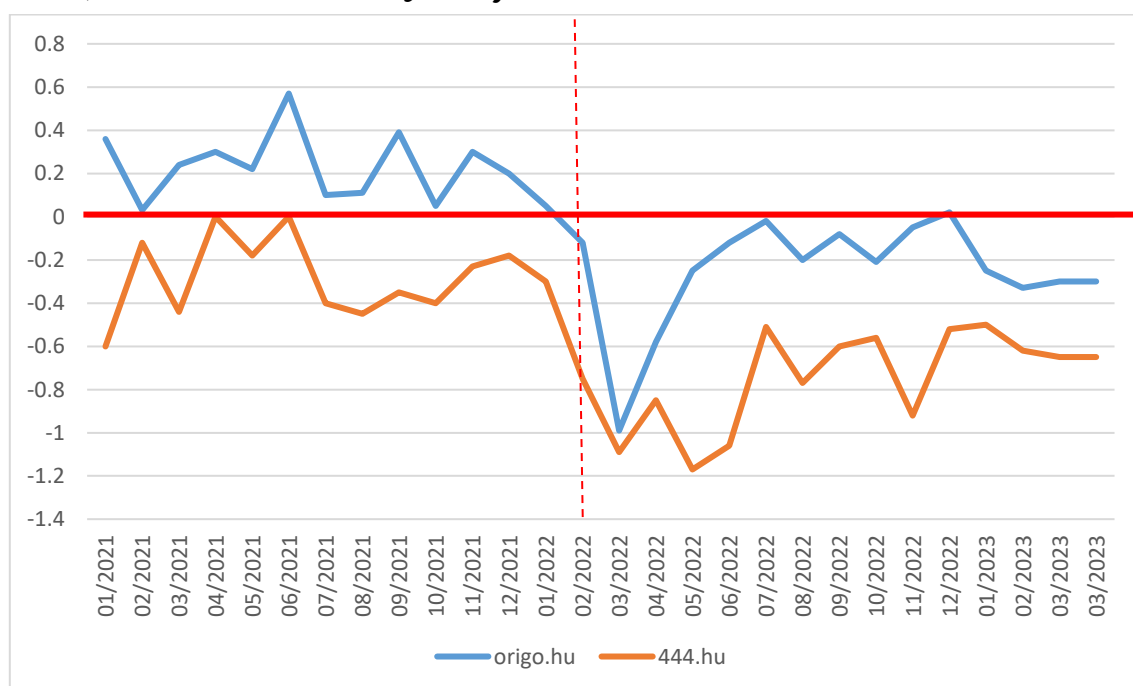
During the post-war period (March 2022–March 2023), the pro-government media is often characterised by articles that make almost no attempt to hide the differences inherent in labelling, i.e. talking about ‘real refugees’ as opposed to undeserving ones. The Minister of Foreign Affairs, on the official website of the Hungarian government, announced that ‘a clear distinction must be made between refugees and illegal migrants’⁷ and the Prime Minister made it clear in one of his regular Friday radio interviews that: ‘There are countries affected by the influx of refugees from Ukraine, such as Poland. There are also those who are affected by the influx of migrants from the south, such as Croatia, Slovenia, or Romania. However, only Hungary and, to some extent, Romania are states that are affected by both’.⁸

In the non-government media, over a short time period (October 2021–November 2022), the number of articles using the label ‘migrant’ was less than the number of articles that used ‘refugee’ but, like the pro-government media, there was some revival of the use of the word ‘migrant’ between March and July 2022.

Different trends can be observed on Facebook (see Figure 4): in particular, the almost complete dominance of the word ‘migrant’ on pro-government sites until February 2022. From January 2021 to February 2022, when the war broke out, there were 3 periods when significantly more posts were created that used the term ‘migrant’. This tendency deviates from the patterns observed in the media, where it can be asserted that analogous outlier periods are absent. Another notable difference is that, after the initial decline in February 2022, it seems that the dominance of the use of the label ‘migrant’ returned on Facebook and, as of July and November 2022, there were twice as many posts that used it. This trend contradicts our assumption: after the initial drop, the MPB returned to its original labelling technique on Facebook.

Focusing on the most ‘radical’ actors in the non-government (444.hu) and the pro-government media segments (origo.hu), a Hungarian research firm compared the labelling techniques of the two segments.⁹

Figure 5. Ratio of ‘migrant’ to ‘refugee’ labels in 444.hu (non-government) and origo.hu (pro-government) media sources between January 2021 and March 2023*



Source: Own calculation. * The red line indicates the baseline value (when the number of the 2 labels is the same). The vertical dashed line marks the month of the outbreak of the war (February 2022).

Comparing the results in Figure 5 to those in Figure 4, we can see that, in the pro-government radical media, the term 'migrant' dominated well before the outbreak of the war and the frequency of using this term started to decrease earlier (November 2021). Consistent with the trends associated with all pro-government articles, use of the term 'migrant' gradually started to rise again after the low point in March. Concerning the non-governmental radical media source, the term 'refugee' was used more frequently than in all non-governmental articles, even in the initial period.

(Un)changing sentiments?

Sentiment analysis, also known as opinion mining, is a subfield of natural language processing (NLP) that focuses on identifying and categorising opinions expressed in textual data. It emerged as a crucial tool in NLP, driven by the exponential growth of user-generated content on digital platforms (Pang and Lee 2008). It involves the systematic extraction and analysis of subjective information from texts, such as opinions, attitudes and emotions (Mohammad 2016). Sentiment analysis is a valuable tool in several domains, including business, public policy and the social sciences. It allows businesses to monitor customer sentiment, thereby facilitating improvements in product development and customer service (He, Wu, Yan, Akula and Shen 2015) and is employed by policy-makers to gauge public reaction to policies and legislation. In the social sciences, sentiment analysis is used to gain insights into public opinion on various social issues, elections and events, etc. (Mohammad 2016).

Of the 3 main approaches¹⁰ used in sentiment analysis, we opted for a lexicon-based approach that is easily interpretable and can be adjusted with domain-specific information. Lexicon-based techniques rely on pre-defined dictionaries of words annotated with sentiment scores (Taboada, Brooke, Tofiloski, Voll and Stede 2011). These approaches build on counting the occurrences of words with positive and negative sentiment in a text to determine their overall score.

For the sentiment analysis used in this research, we used the 2 corpora that were created to analyse the labelling: a 'refugee corpus' and a 'migrant corpus'. In preparation for the sentiment analysis, we applied syntactic analysis¹¹ to understand the role of each word within each sentence. We calculated the absolute and sentiment score for each sentence using the Hungarian sentiment corpus (HuSent),¹² which is the sum of the sentiment values for the words in the targeted sentence. With the help of this method, we investigated the character of the discourse and how it changed over time, both in general and for selected sentences, focusing only on those containing the 2 keywords 'migrant' and 'refugee'.

The text preprocessing steps were identical for both the 'refugee corpus' and the 'migrant corpus'.¹³ As a first step, we retained only those sentences from within the specified time interval (from 1 February to 20 March 2022, encompassing 24 days before and after 24 February 2022). Subsequently, we applied a filter to ensure that the content in our corpora pertained solely to the Russian–Ukrainian war. To achieve this, we used the following keywords: 'war', 'Zelensky', 'Ukraine', 'Ukrainian', 'Ukrainians', 'Putin' and 'Russia', 'Russian' and 'Russians'. In the third step, we eliminated duplicate sentences with repeated identifiers. Finally, we selected sources used in the first part of the paper and categorised them as pro-government and non-government. After these steps, the 'refugee database' contained 3,021 sentences and the 'migrant database' contained 115 sentences.¹⁴

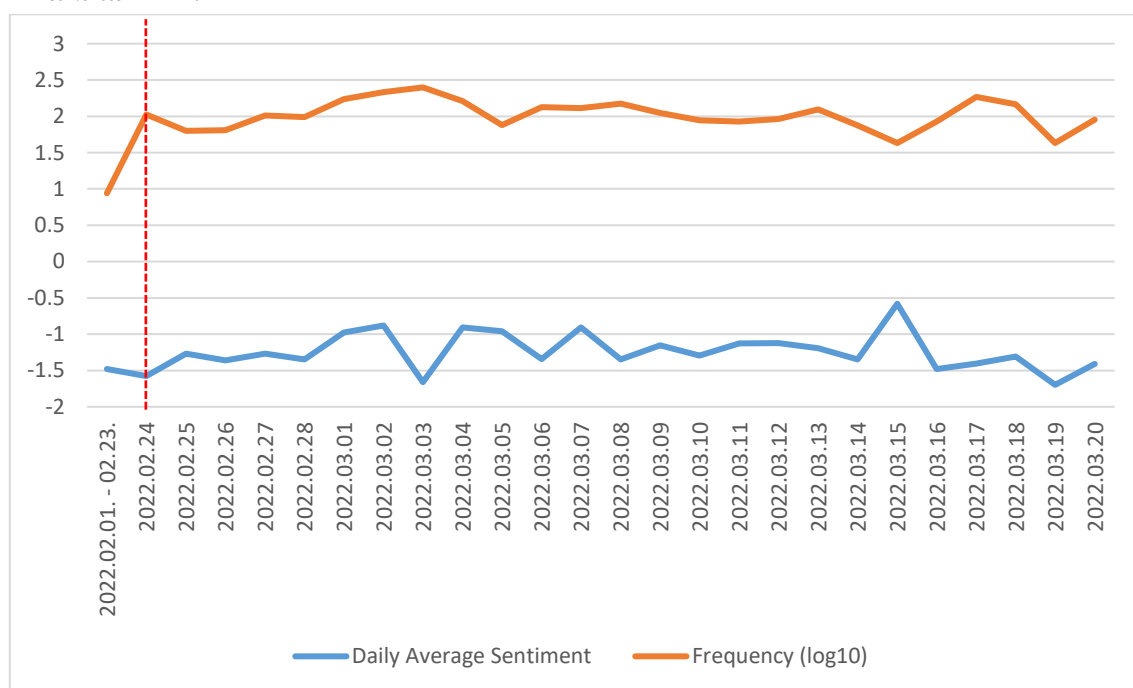
Besides the above-described methodology, we complemented the quantitative approach with qualitative methods. We studied the speeches sentence by sentence, focusing on the context of predefined keywords and noted all substantively relevant aspects in a bid to obtain a deeper understanding of the observed empirical patterns. We also used excerpts from the text to highlight the discursive strategies. We collected some relevant examples, showcasing the usage and interpretation of

the sentiment scores, specifically in the context of the Russian invasion of Ukraine and the Russian–Ukrainian war.

Examples like ‘[s]he is very concerned about the fate of refugees’ and ‘the refugees are in a very bad state’ were associated with negative sentiment scores (-3.6, respectively). Examining positive sentiment scores also contributed to the analysis: an example sentence with high positive sentiment (4) is as follows: ‘They had not yet fled the war but came to Mosonmagyaróvár in the hope of a better life’.

Figure 6 shows the general trend in sentiment and the frequencies of online media.¹⁵ After 24 February 2022, the frequency of war-related sentences multiplied immediately: on 23 February, there were only 11 sentences, whereas, by 24 February, the number had already increased to 106 sentences. Later, the average daily number of sentences stabilised – exhibiting minor fluctuation and maintaining this level until the end of the examined period.¹⁶

Figure 6. Daily average sentiment and frequency of sentences before and after 24 February (total corpus $N_{\text{sentences}}=3021$)*



Source: Own calculation. * The vertical dashed line marks the outbreak of the war (24 February 2022).

The sentiment scores before 24 February 2022 were often characterised by negative content, frequently featuring the word ‘war’; for example, ‘In the event of a war in Ukraine, hundreds of thousands of refugees would arrive – warned Orbán, who believes that this should be avoided but, if a war breaks out in Ukraine, Hungary has an “action plan” for this case as well’.¹⁷ February 24 did not bring as much change in the emotional charge as it did in the number of sentences. From that point onwards, the daily average sentiment stabilises around a consistent value. Like the daily average article count, several noticeable spikes are evident on our timeline.

As mentioned earlier, we examined the sentiment scores of sentences containing the word ‘refugee’ in conjunction with certain war-related terms. To do this, we defined 3 categories based on specific expressions: the first category included sentences containing the word ‘war’ as the key element of the ‘story’ while the second and third types were sentences with words referring to the main ‘actors’

(‘Zelensky’, ‘Ukraine’, ‘Ukrainian’ and their variants or the words ‘Putin’ and ‘Russia’, ‘Russian’ and their variants). We calculated the average sentiment of these terms before and after 24 February 2022 (see Table 1).¹⁸

Table 1. Average sentiment scores before and after 24 February 2022*

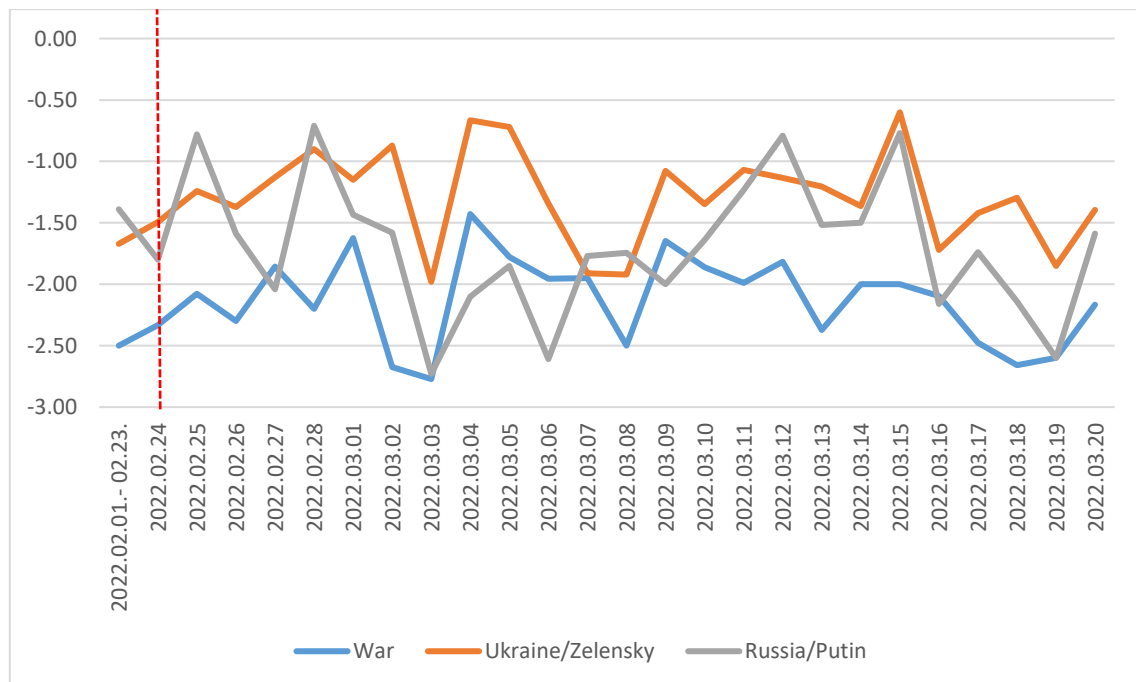
	Total Corpus	War	Ukraine/Zelensky	Russia/Putin
Prior to 24 February 2022	-1.48	-2.50	-1.67	-1.39
After 24 February 2022	-1.28	-2.13	-1.29	-1.70
Difference	0.20*	0.37*	0.38*	-0.31*

Source: Own calculation. * Independent samples T-tests, $p < 0.05$. For the values in italics, due to the difference in standard deviation, we used Welch’s t-test.

All the differences between the two periods were found to be statistically significant. It can be concluded that, in the sentences that use the word ‘war’, the term ‘refugee’ was associated with the most negative tone both before and after the outbreak of the war. As for the 2 ‘actors’, the trend with sentiment change was the opposite and, in the post-escalation period, the attitude towards ‘refugee’ in the Ukrainian context was more positive than in the Russian context.

Based on Figure 7, it is apparent that the sentences containing the 3 terms show a diverse range of sentiments and oscillate a great deal.¹⁹

Figure 7. Daily evolution of sentiment scores in connection with individual concepts (War, $N_{\text{sentences}}=747$, Ukraine/Zelensky, $N_{\text{sentences}}=2,801$, Russia/Putin, $N_{\text{sentences}}=964$) before and after 24 February 2022*

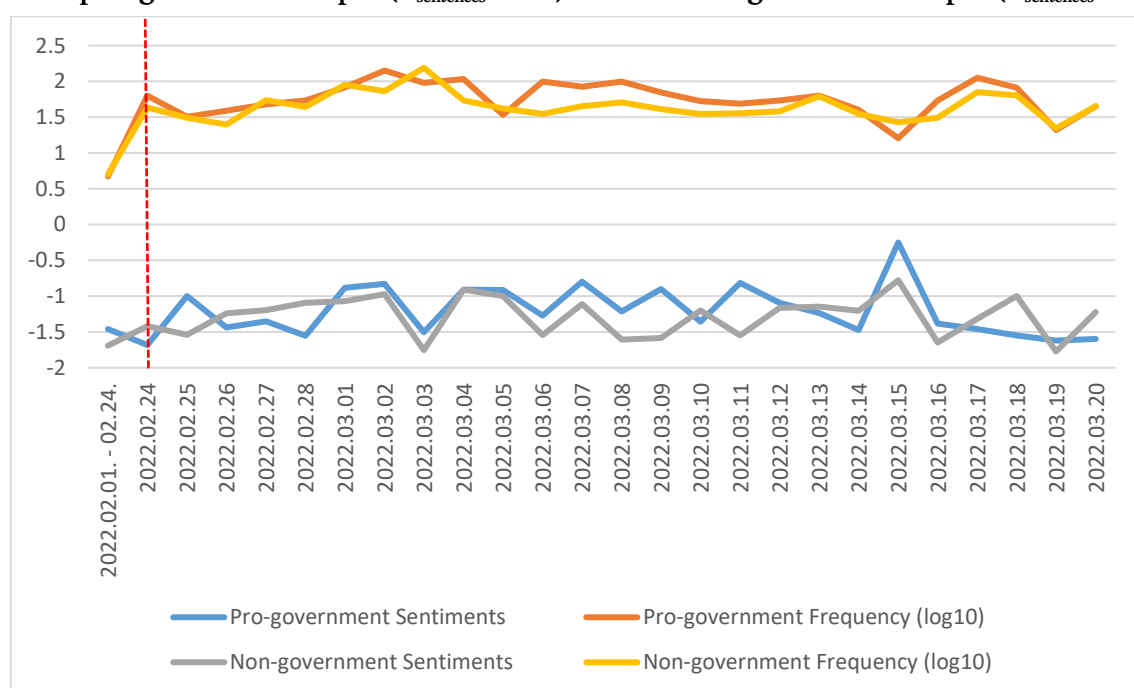


Source: Own calculation. * The vertical dashed line marks the outbreak of the war (24 February 2022).

Sentences written in connection with Russia/Putin a week after the outbreak of the war, for example, tend to be more negative even than sentences containing the word ‘war’. It is noteworthy that the mention of Ukrainian/Zelensky is associated with the highest positive emotional charge during the period when the term Russia/Putin is at its lowest point.

In Figure 8, we investigate the potential influence of MPB on the emotional tone of articles. The technique involved comparing the trend in the sentiment and frequency of sentences containing the term ‘refugee’ in the MPB-dominated pro-government and the less affected non-government media segments.

Figure 8. The daily average sentiment and the frequency of sentences before and after 24 February 2022 in the total pro- government corpus ($N_{\text{sentences}}=1701$) and total non-government corpus ($N_{\text{sentences}}=1320$)*



Source: Own calculation. * The vertical dashed line marks the outbreak of the war (24 February 2022).

The figure indicates that, even prior to the start of the Russian invasion of Ukraine, the term ‘refugee’ had negative connotations within the context of the war on both sides.²⁰ During this period, most articles focused on the influx of refugees and explored the possibility of accepting them. For example, on 21 February, there were relatively more sentences associated with distinctly negative content. At that time, Orbán met with Slovenian Prime Minister Viktor Janša in Lendava, where the following sentence was uttered and subsequently quoted by numerous sources: ‘In the 1990s, during the Yugoslav war, tens of thousands of refugees came to Hungary but, in terms of population, Ukraine is much larger than the former Yugoslavia. Therefore, if there is a problem there, the resulting refugee pressure on Hungary will have a much greater security and economic weight’.²¹

After Russia launched its invasion of Ukraine, for a brief period the pro-government media adopted a more positive tone when writing about refugees but this trend quickly reversed. Another turning point was 5 March, when pro-government media adopted a positive stance towards refugees in their reporting for approximately a week. During this period, numerous articles featured sentences expressing refugees’ gratitude towards Hungarians, discussed donations intended for refugees or

highlighted the exemplary nature of humanitarian aid efforts. The peak in positive values from the pro-government side on 15 March is attributable to several sentences discussing donations and the provision of solidarity train tickets for refugees occurring simultaneously. This form of government propaganda combines the narratives of sovereignty and solidarity. From this perspective, the Hungarian government emerges as the protagonist, facilitating assistance to Ukrainians and coordinating support, while portraying the war as an evil force that victimises Ukrainians. The government narrative emphasises that, although it cannot end the war, it provides oversight and control (rather than following prescriptions from international actors), thereby enabling Hungarians to assist those arriving from a neighbouring country.

Summary and conclusion

This study has analysed whether there was a change in the technique of labelling displaced persons arriving in Hungary around the start of the Russian–Ukrainian war. At the beginning of the study, we raised 2 questions regarding MPB-related language. The first question was more about the short-term connection between the MPB and the wave of war refugees – namely, that the pro-government media, which strongly operates the MPB, changed more in terms of ‘migrant’/‘refugee’ labelling than the non-government media.

We examined the frequency of use of the terms ‘migrant’ and ‘refugee’ separately for online media sites and Facebook posts and separately for non-government and pro-government sites. In the case of the online media, it was evident from the ratio of use of the ‘migrant’ label compared to ‘refugee’ that the MPB had to change its language towards uprooted individuals from Ukraine. Analysis of the trends on a daily basis showed how suddenly the MPB was able to react and change its labelling method.

It is also clearly visible that, before the war, the presence of the concept of ‘migrant’ was much stronger in the pro-government media and the downward trend mentioned earlier also started from a higher level. The decline reached a low approximately 2 weeks after 24 February. In sum, it can be stated that, following 17 February, when the term ‘migrant’ became more common on both sides, this change was much greater in the pro-government media.

Our second question was related to the long-term operation of the MPB. After analysing the period 1 year after the outbreak of the war, it can be stated that the use of the term ‘migrant’ in the pro-government media gradually came back into use, although its previous clear predominance was not achieved again. In addition to the wave of displaced individuals from the Russian–Ukrainian war, the MPB had to take into account other forms of migration that are not connected to it. Overall, it can be concluded that the MPB was able to change its language very quickly at the outbreak of the war but this change can only be said to be temporary in the long term.

In analysing the sentiment scores, we aimed to examine attitudes towards people fleeing the war in the Hungarian media in the context of the Russian–Ukrainian war. Our main question was whether 24 February 2022 brought about any changes in emotional content and interest. We investigated this question using a unified corpus as well as pro-government and non-government corpora separately.

Based on our analysis of media coverage across all outlets, it can be concluded that content related to the term ‘refugee’ became more negative after 24 February 2022 and the volume of content related to this term increased, particularly immediately after the outbreak of the war. However, it was also demonstrated that the emotional content of sentences about ‘refugees’ varied depending on the war-related actor with which they were associated. Our analysis revealed that, in the context of Russia,

mentions of the term 'refugee' tended to have a more negative tone after the outbreak of the war than mentions in the context of Ukraine.

Regarding pro-government and non-government media outlets, it was observed that the negative emotional charge towards 'refugee' decreased in the former after 24 February 2022. Upon analysing the sentence content, we found that this shift largely originated from their emphasis on expected solidarity, the necessity of assistance and expressions of gratitude from refugees towards Hungary.

Notes

1. Regarding the pre-processing of the 2 corpora (Németh, Katona and Kmetty 2020), we identified and standardised the relevant words (tokenisation) and removed the meaningless words (stop word removal). All the steps involved in the data preprocessing were performed in R. During *tokenisation*, the text to be analysed is broken down into units, so that the tokens represent individual words or phrases. During *stemming*, the word-splicing algorithm simply cuts off all suffixes and adjectives. Instead of stemming, we can also use dictionary formatting (*lemmatisation*). The difference between the 2 procedures lies in the fact that, during stemming, we only remove the endings of the words identified as suffixes to reduce the different forms of the same word to a common stem while, in the case of lemmatisation, we immediately get back the meaningful, dictionary form. The choice between the 2 methods is founded on the researcher's decision based on the research question (Grimmer and Stewart 2013). For the research described in this paper, we relied on lemmatisation.
2. After the removal of the multiple publications, the thresholds are proportional to the size of the 2 corpora. Regarding the categorisation of the media outlets (pro- or non-government), we relied on ownership and/or their relation to a MPB-related organisation. We used the 2 sources the most often cited in the Hungarian literature for their identification: <https://21kutatokozpont.hu/mediairanytu.html> and <https://www.valaszonline.hu/2021/01/04/a-ner-mar-a-sajto-50-szazalekat-kontrollalja-itt-a-nagy-mediaterkep/>.
3. The number of followers based on Facebook data, January 2024.
4. <https://24.hu/belfold/2022/02/22/honvedseg-benko-tibor-ukrajna-oroszorszag/>
5. For the 24-month analysis, we relied on a 20 per cent sample from another database (articles (N=74,470) and posts (N= 26,379), published between 11 February 2019 and 11 February 2022). All pre-processing and selection processes were the same as in the newer corpus.
6. The questions were:
 - György Soros will attack Hungary again after the epidemic, because the Hungarians are against illegal migration. Some people think that the pressure exerted by the Soros organisations should be resisted, while others think that Hungary should give way in the migration debate. *What is your opinion?*
 - According to Brussels bureaucrats and György Soros' organisations, the importation of 'immigrants' should be accelerated in the years after the epidemic. 'Migrants' arriving by sea must be distributed among European countries. The Hungarian government does not support any mandatory distribution. According to the government's position, even after the epidemic, 'migrants' can only be accepted on a voluntary basis and it is not possible to distribute them among the countries of the union in a mandatory manner. *What is your opinion?*
 - Some people think that an epidemiological 'migrant' STOP is needed in the 2 years after the epidemic. The borders must be completely closed to 'migrants' because they can bring new

virus mutations into Hungary. According to Brussels bureaucrats, ‘migrants’ arriving during the epidemic should not be refused admission. *What is your opinion?*

7. Világos különbséget kell tenni a menekültek és az illegális migránsok között (kormany.hu).
8. Orbán Viktor: Eljött a pillanat egy új határvadászrendszer megszervezésére (hirado.hu).
9. <https://21kutatokozpont.hu/mediairanytu.html>.
10. There are at least 3 different approaches to sentiment analysis: 1) lexicon-based, 2) machine learning-based and 3) hybrid approaches.
11. For the syntactic analysis, we applied universal dependency parsing, using the *udpipe* package in R and the *udpipe_load_model* function to open the file created specifically for Hungarian; ‘hungarian-szeged-ud-2.5-191206.udpipe’.
12. Further information on the Hungarian sentiment corpus (HuSent) can be found here: <https://rgai.inf.u-szeged.hu/node/363>. According to its description, HuSent ‘is a deeply annotated Hungarian sentiment corpus. It is composed of Hungarian opinion texts written about different types of products, published on the homepage [<http://divany.hu/>]. The corpus is made up of 154 opinion texts and comprises (...) approximately 17,000 sentences and 251,000 tokens’. The corpus HuSent was created by Precognox Ltd and HUN-REN—SZTE Research Group on Artificial Intelligence (RGAI).
13. Except that, in the case of the ‘migrant’ corpus, we had to deselect sentences containing misleading migration-related content such as ‘The primary interest of the Visegrád Group (V4) is to curtail migration’ or ‘The support and even encouragement of illegal migration is directly associated with the proliferation of anti-Semitism’.
14. Due to the low number of cases in the ‘migrant’ corpus, the detailed comparative analysis of sentiment in sentences containing the terms ‘refugee’ or ‘migrant’ was not feasible. We had to restrict ourselves to comparing the aggregated results only. Contrary to our expectation, (1) in the pre- and post-war periods, the average sentiment of sentences containing the term ‘refugee’ was more negative than that of those using the term ‘migrant’ and (2) both ‘improved’ in the aftermath of the war – the average sentiment score during the pre-war period was -1.48 (‘refugee’) and -1.05 (‘migrant’) while, in the period following the outbreak of the war, it was -1.24 (‘refugee’) and -0.75 (‘migrant’).
15. Due to the low number of cases, sentiment scores and sentences were aggregated before 24 February 2022; however, there were days when discussions about refugees increased significantly, such as between 8 and 11 February, when Polish authorities warned of an impending wave of ‘refugees’.
16. Due to the low number of cases before 24 February 2022, the sentiment scores were aggregated in all figures and, to enhance readability, the frequency of sentences was logarithmised (using logarithm base 10).
17. https://hvg.hu/itthon/20220212_Orban_evertekelo_osszefoglalo.
18. We examined the change in the average frequency of sentences as well and, unsurprisingly, found a significant increase in the number of sentences in both periods.
19. The daily minimum number of sentences was 3 for the concept of War, 36 for the concepts Ukraine/Zelensky and 12 for the concepts Russia/Putin.
20. Due to the smaller size of the 2 corpora, we computed averages for both sentiment scores and sentence frequencies for the period preceding 24 February 2022.
21. <https://kormany.hu/hirek/a-magyar-es-a-szloven-gazdasag-megerosodve-kerult-ki-a-valsagbol>.

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(Un)Deserving Refugees: The Migration Discourse in Hungary, 2015 and 2022¹

Ráchel Surányi*, Éva Bognár**

The Hungarian government took an anti-immigrant and anti-refugee stance in 2015 and claims to have stuck to it ever since. However, in 2022, when many Ukrainians (including ethnic Hungarians) passed through Hungary after Russia started its invasion of Ukraine, the same government welcomed them. In this paper we illustrate how the Hungarian government's approach shifted, without explicitly changing their main narrative but adding a new one to it: the aspect of deservingness. We also wanted to see the differences between the pro-government and the non-pro-government mediums. To illustrate this shift and the differences between the 2 platforms, we used qualitative methods: we analysed pro- and non-pro-government media during the 2015 and 2022 refugee crises and conducted expert interviews.

Keywords: migration, refugees, Hungary, deservingness, media analysis, qualitative research

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Introduction

In 2015, when the first influx of refugees reached Europe, the Hungarian government started its anti-immigration and anti-refugee propaganda by pressing the moral panic button or MPB (Sik and Gerő 2020). In 2022, after the Russian invasion of Ukraine, the same government welcomed the refugees arriving (or passing through) from the neighbouring country. It is important to stress that the ‘refugee hypocrisy’ (Traub 2022) is not a Hungarian-specific phenomenon. Europe had a different approach to the refugees in 2015 than to Ukrainian refugees in 2022; however, here we focus on Hungary, where the political environment (a modified version of informational autocracy – see Sik and Krekó 2025, in this section) enforces the constant use of migrants as scapegoats by pressing the MPB.

In this paper we illustrate how the Hungarian government’s approach shifted without explicitly changing their main narrative but by adding a new aspect to it. In other words, how did the narrative move from refugees and ‘undeserving/illegal/economic migrants’ to ‘deserving refugees’? We focus on 2 periods of refugee influx in Hungary – 2015 and 2022 – and present the narratives through 2 case studies. We deviate from the routine of analysing migration narratives in Hungary from the securitisation aspect and examine them from a deservingness point of view.

The fact that the government is still continuously using the slogan ‘No migration! No gender! No war!’ shows the relevance of this paper at the domestic level. The anti-immigration stance is not unique to Hungary: there is a tendency in some European countries for mainstream parties to adopt the radical right-wing anti-immigration agenda.²

Research question and methodology

Our main research question is the following: What were the main migration narratives of the government and what were the differences in their presentation between the pro-government and the non-pro-government mediums and over time? We argue that, despite the Hungarian government’s claim that it has not changed its main narrative about refugees, it has added a new aspect to it: ‘deservingness’, based mainly on the cultural and civilisational similarity of this population with the Hungarian people.

In order to substantiate our argument and answer our research question, we used a qualitative methodology, namely media (content) analysis. Since 2010, the Hungarian government has significantly restructured the media landscape: it exercises control through various mechanisms, such as regulation, takeovers, state advertising, etc. (see more in Kovács, Polyák and Urbán 2021). Through these means, the Hungarian government exerts significant influence on public discourse, including agenda-setting, information flow and narrative-framing. This influence is particularly evident in the shaping of the media coverage of migration (Messing and Bernáth 2016). For this reason, we believe that analysing media discourse is a good way to form our analysis: the media shapes public opinion and reflects on what the government does.

We chose 2 specific periods/events which we believe best illustrate this shift in communication about immigrants. For 2015, we conducted a media analysis of the National Consultation on Immigration and Terrorism (NCIT) and, for the 2022 refugee crisis, we conducted a media analysis of the first week after the Russian invasion. For both periods we analysed some of the most read non-pro-government and pro-government mediums at that time. In 2015, we included 125 articles from 3 different outlets: a pro-government outlet (*Magyar Idok*), a non-pro-government centrist outlet but which was more critical of the government, with one of the largest readerships at the time (*Index*) and a non-pro-

government liberal outlet (444). The study period is between the first mention of the national consultation (6 February 2015) and the end of the consultation (end of July 2015).

In 2022, the database consisted of 124 articles from 3 different online newspapers: *Magyar Nemzet* as the pro-government media and the main channel of the government, *24.hu* as a non-pro-government centrist media – a left-wing portal with the aim to present an objective picture about migration in Hungary – and *HVG.hu*, the non-pro-government progressive media which regularly publishes political essays criticising the government. The articles were carefully selected on the basis of their heterogeneity and relevance to the topic. In both cases only those articles were chosen in which the selected topic covered a substantial part of the entire text. In the first case, the key phrase was ‘national consultation’ while, in the second case, the keyword was ‘refugee’ or ‘immigrant’ and the content had to relate to Ukrainians fleeing to Hungary.³ In both cases the articles were analysed manually with coding technique.

To complete the research, we conducted interviews with experts from different fields: activists, journalists, representatives of Hungarian and international NGOs, public officials and informal organisations. The interviews were only used for additional reference (for more on the methodology, see Bognár, Kerényi, Sik, Surányi and Szabolcsi 2023).

Reflections on the limitations

Since our paper is based on 2 different work packages within an EU project, there are some differences within the methodology. Regarding the 2 periods, we had to choose different case studies (as for every consortium partner) within the ‘refugee crisis’, therefore the keywords had to differ in the 2 periods. For the second phase, the Ukrainian refugee inflow seemed like an obvious choice since we were in the midst of the crisis. However, because both projects aimed at analysing the media narratives and the consortium agreed to our idea of analysing them in this way, we believe that it serves as a good basis for analysis – even if the focus (and the keywords) were different. Regarding the differences between the mediums, we could not choose the same because the Hungarian media landscape has changed. Regarding the pro-government mediums, one of them (*Magyar Idők*) was no longer available in 2022, and *Index*’s ownership had changed, which made us exclude them from the analysis. However, the strategy for both periods remained the same and, because we took into account the readership and the significance of the news outlets, we believe that they represent the 2 ‘sides’ perfectly.

The structure of this paper is as follows: first, we present the background theories that we apply in our analysis and make a detour into the Hungarian context. Then we present the data for 2015 by focusing on the NCIT, before analysing the data from the first week immediately after the Russian invasion of Ukraine in 2022. Finally, we present our conclusions.

Migration narratives and deservingness

Migration became a hot topic in Hungary after 2015 but, unlike in many other European countries, where the topic soon died down, the Hungarian government has kept it on the agenda ever since. Recognising its success as a fear-mongering issue and, despite the fact that Hungary does not have a significant number of migrants and/or refugees, it has remained a crucial issue because it became part of the political propaganda (Benczes and Ságvári 2022; Bernát and Tóth 2022; Bognár, Sik and Surányi 2022; Reményi, Glied and Pap 2023).

There is an extensive literature on the deservingness of refugees and migrants which discusses how politics create hierarchies between and within groups of mobile populations (Anderson 2013; Holmes

and Castañeda 2016; Ratzman and Sahraoui 2021). Deservingness has 3 distinct dimensions. The first is related to security, the second is economic and the third is cultural assimilability. Refugees – to be considered as deserving – must be economically useful, culturally assimilable and not pose a security threat to the country (Brekke, Paasche, Espegren and Sandvik 2021; Mourad and Norman 2020).

In order to be seen as deserving (...) refugees have to demonstrate that they are at risk in their countries of origin or first countries of refuge, yet willing and able to 'overcome' their vulnerability to become law-abiding, self-sufficient and culturally malleable future members of their host societies (Welfens 2023: 1104).

However, Welfens (2023) argues – applying the concept of 'promising victimhood' – that there is a tension between these 3 dimensions of assimilability and vulnerability. In her study, she focuses on how social markers (gender, age and race) influence the assessment of vulnerability and assimilability. We also use her arguments in this study to illustrate how the official perceptions of refugees are gendered, racialised and age-differentiated and which groups are considered 'deserving' or 'undeserving'.

The Hungarian context

Since coming to power (in 2010), the Fidesz government has substantially restructured the media (see Sik and Krekó 2025, in this section) and has been using its hegemony not only to run almost continuous national billboard, TV and radio campaigns from public resources on various topics but also to launch smear-campaigns (even charade assassinations) against critics of the government (including politicians, journalists, members of civil society activists (Magyar Jeti 2023). Through these means, the Hungarian government has a dominant position from which to influence public discourse: on agenda setting, content of the discourse, information flow and language. Therefore, we believe that, by analysing the media discourses, we will receive an answer to our research questions. As a political analyst, Zoltán Lakner pointed out in a podcast (Klubrádió 2024) that even the non-pro-government media is expressing everything through the PM's lens – such as saying 'an ally of Orbán said...' instead of using the person's name.

There are 2 important migration-related features in Hungary: first that Hungary has only a small migrant population (who reside here permanently) and who are mostly ethnic Hungarians from neighbouring countries; and second, that xenophobia has been relatively high in Hungary since the 1990s (Surányi and Sik 2025, in this section) as part of a general intolerant value system that also includes prejudice against the Roma and the Jews as well (Bognár *et al.* 2022).

Although Hungary has never been a destination country, about 180,000 asylum-seekers passed through the country during the summer of 2015. Although they did not intend to stay, due to their unexpected arrival and large number, they were considered a threat to Hungary and therefore a fence was built along the Serbian–Hungarian border in September 2015 (Bernát, Fekete, Sik and Tóth 2019). In recent years, Hungary has been closed to asylum-seekers but human trafficking is still widespread and other types of migrant (guest workers, informal migrant workers and students) are also present.

At the beginning of 2015, the government launched a broad anti-immigration campaign, linking terrorism and immigration and changing Hungary's asylum system through legal means – such as amending both the Asylum Act and the law (and its implementing regulation) on the entry and residence of third-country nationals, more than 30 times (Tóth 2020: 4) The modifications not only led to instability in the regulation related to immigration but also significantly changed Hungary's asylum system.

In 2022, after Russia began its invasion of Ukraine, the existing legislation was a major obstacle, as it did not provide a way to enter Hungary as an asylum-seeker. Therefore, the Hungarian government amended the legislation to include temporary protection for people fleeing Ukraine and introduced new services for dual citizens (see Hungarian Helsinki Committee 2022).

Table 1 summarises the main characteristics of the 2 refugee crises as perceived by the Hungarian population and the government. The perception does not necessarily reflect the reality but it is very close to it and provides a good basis for the following analysis.

Table 1. Hungarians' perceptions of the migrants/refugees and migration processes in 2015 and 2022

2015	2022
No previous experience in Hungary	Previously existing networks of commuting between Ukraine and Hungary and the labour migration of Ukrainians
Mix of migrants and asylum-seekers	Unquestionably war-related refugee
Mainly single young males	Mainly women, the elderly and children
Different cultural characteristics (religion, language) and often skin colour	Similar cultural characteristics
The typical refugee was on the run for a long time, was poor, un(or mis-)informed and often exploited by smugglers	The first refugees were relatively well off and needed only minimal help

Source: Gerő, Pokornyi, Sik and Surányi (2023: 7).

'Illegal migrants' in 2015 versus 'real refugees' in 2022

We have chosen 2 case studies to illustrate the differences in narratives. First, we examine the online media during NCIT in 2015, the first pressing of the MPB. Then we analyse the online media focusing on the refugee flow from Ukraine in 2022.

'If you come to Hungary, you cannot take our jobs' – NCIT

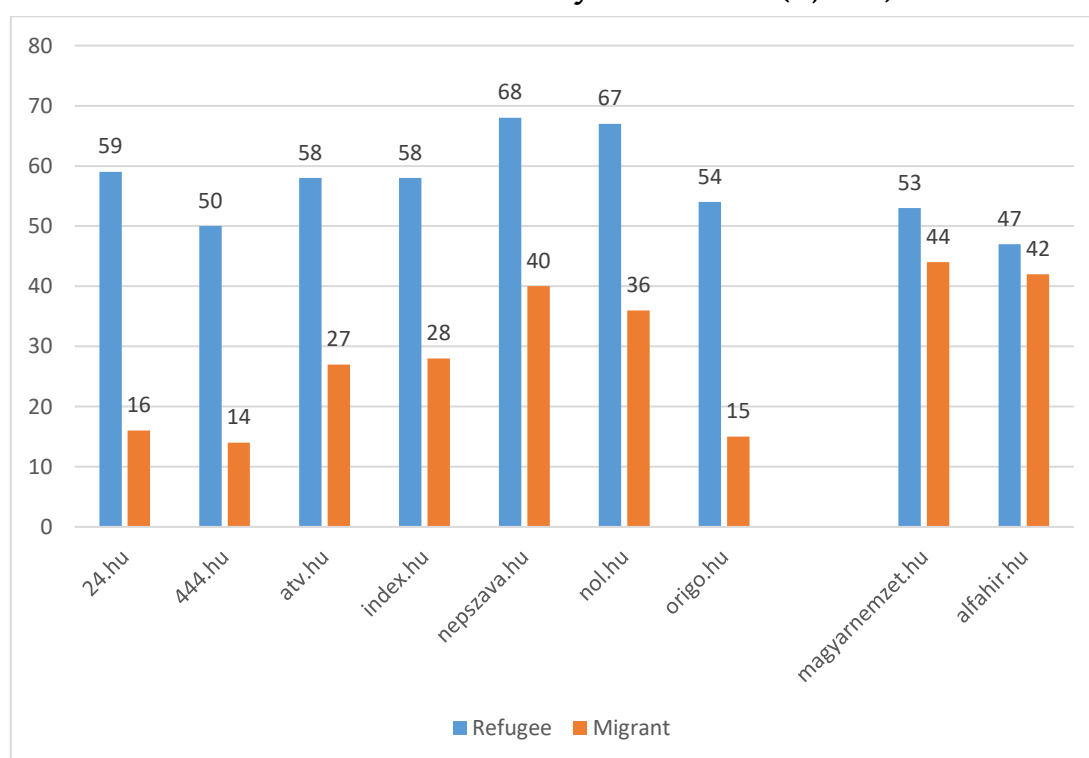
The 'history' of the MPB includes 9 push polls – labelled as 'national consultations' – to legitimise its policies and undermine criticism of the regime (Sik and Krekó 2025, in this section). Thus, the Orbán regime belongs to the group of authoritarian leaders who implement a variety of 'innovations' in order to prevent their loss of power, maintain the illusion of democratic legitimacy and control social conflicts and changes (Curato and Fossati 2020; He and Wagenaar 2018). In this section, we focus on the NCIT in 2015. We illustrate how its framing and propaganda techniques were designed to become the main fear- and crisis-mongering technique of the MPB (for the exact questions, see the Annex).

The use of the terms 'migrant' versus 'refugee' has become highly politicised: the former is used for people who choose to leave their home country for economic or other personal reasons, while 'refugee' is used for people who are forced to flee. While we agree with Crawley and Skleparis (2018), who argue that this is a simplistic approach and that the reasons why people left in 2015 were far more complex, it is still meaningful to analyse the use of these 2 terms in the media. Therefore, prior to the qualitative analysis of the narratives, we provide an overview of the word frequencies of the NCIT-related articles in the media in order to better understand the context.⁴ The most salient negative terms in these articles were as follows:⁵ fear (38 per cent), illegal (36 per cent), terror (22 per cent), bad (21 per cent), war (17

per cent), problem (16 per cent) and crisis (15 per cent). The more salient positive terms were: solution (26 per cent), unequivocal (16 per cent), proper (11 per cent) and help (10 per cent).

Regarding the 2 labels, we assumed that, while the pro-government media would use the label ‘migrant’ more often, the non-pro-government media would more frequently use the label ‘refugee’ – i.e. while the MPB would use the term with negative connotations to increase the level of threat, non-pro-government media outlets would not use such a labelling technique. Figure 1 shows that there is, indeed, a significant difference between the non-pro-government media (the first 7) and the pro-government (the last 2) media, although the labelling technique meant increasing the use of the term ‘migrant’ but not avoiding the term ‘refugee’ (Figure 1).

Figure 1. The trend of the MPB-determined labels by media outlets (% , 2015)



Source: Gerő et al. (2023).

The main narratives in 2015

The NCIT focused on the government’s anti-immigration and anti-refugee propaganda and policies. Two main opposing narratives were found in the articles with 1 or 2 side-narratives on each ‘side’. In the following section we highlight those aspects of the findings that relate to the immigrants/refugees and omit those details that relate to the technical and descriptive dimensions of the national consultation.

In the pro-government media outlet, the dominant migration narrative obviously supported the government’s view that migration was an inherently bad thing, as Orbán – deliberately using the term ‘economic migration’, referring to the fact that he does not consider people as asylum-seekers, i.e. people who deserve solidarity – said: ‘Economic migration is detrimental to Europe: one cannot think of it as something useful, because it only causes harm and danger to Europeans, so migration must be stopped, this is the Hungarian point of view’ (Dull and Miklósi 2015; see Figure 2).

Figure 2. National consultation billboard: ‘If you come to Hungary, you have to respect our culture’



Source: Kovács (2015).

In this narrative, the NCIT has been disguised as a public opinion survey on which an information campaign was built. The aim of these 2 actions was to legitimise the government’s anti-migrant actions – the government, though, had started acting before the results of the NCIT were available (Tóth 2022).

This narrative was supported by 2 sub-narratives. First, the government was using the method of fear-mongering: many articles in relation to the NCIT stated that migrants were flooding towards Hungary based on the fact that – as elsewhere in Europe – significantly more of them were actually arriving compared to the previous years. Or, as they put it, many illegal immigrants were being caught at the borders. Fear-mongering was one of the reasons why the word ‘illegal’ appeared so often, especially in the pro-government media. Fear-mongering was often achieved by using a vocabulary reminiscent of the way natural disasters and wars are described. For example: ‘Migrants continue to flood’ Hungary (*Magyar Idők*, 2015). People speaking for the government often used language like ‘invasion of immigrants’ or ‘we are witnessing the “mass migration of the modern times”’ (Herczeg 2015).

The use of this language by the pro-government media implies that they see migrants as a faceless mass. This is also due to the fact – as one expert pointed out in the interview – that, in 2015, Hungarian journalists hardly knew anything about what was happening abroad, especially in the MENA region and Africa in 2015. Therefore, there are only a few articles in which they write about the reasons why the Hungarian public is distanced from the events. Furthermore, Van Dijk (1997) argues that the use of these negative terms may contribute to the reproduction of racism in the country.

Since, according to the government, ‘there is a need to respond to the influx of economic migrants’, the second sub-narrative was the patriotic narrative. Its main message centred on the right to defend Hungary as opposed to accepting the European asylum policies imposed on the country. These articles questioned whose responsibility it was to defend Europe’s borders against the ‘enemy’ and/or to help migrants to stay in their countries of origin – allowing the government to position itself as generous and kind-hearted. As Orbán said: ‘It is not enough to defend Europe’s borders: we need to have a policy that helps those who flee to stay where they were born’ (*Index* 2015a). The solution to the paradox that Orbán’s constant criticism of the European Union (how it encroaches on Hungarian sovereignty) does not prevent him from expecting a common EU policy is that, in Orbán’s vocabulary, ‘real politics’ means selecting issues that are in his interest as ‘real EU policy’. To sum up the government’s point of view:

We consider it a fundamental value that Hungary is culturally, attitudinally, civilisationally and traditionally homogenous and we would prefer not to sacrifice this. But we also do not aim to contest the right of countries to accept refugees, countries who have by now gotten used to this and wish to solve their problems in this way. Hungary has a Christian government. There is mercy in our hearts, which is why we have always welcomed the persecuted and will continue to do so. But the people arriving in Hungary today are not like this, they are economic migrants (Index 2015a).

This quote clearly states that these people are not refugees but economic migrants – therefore undeserving – and that there would be cultural conflicts with accepting them nor do we want to increase civilisational tensions in Hungary. Although solidarity is mentioned – stemming from the Christian nature of the state – it is likely to be more than a ‘fig leaf’. As Orbán pointed out: ‘Brussels wants them to stay and let others keep coming. We want them to stop coming and those who are already here to go home’. He said that he wanted to control who could enter the country and that he would not agree to a common European immigration/refugee policy, because ‘It is the most elementary right of a country to decide who may cross its borders. “The only reason why we cannot send them home and have to let them in, is that EU regulations force us to do so”. The issue of immigration must therefore be returned to the jurisdiction of the member states or the EU regulations have to be changed’ (Losonczi and Bákonny 2015). Finally, the government’s view was that the left-wing opposition supports immigration and aims to damage the country, i.e., they are against national interests.

The third – security – aspect of deservingness also appeared in several cases: the government communicated the *risk posed by migrants* to the wellbeing of the local population. This was pushed by one of the ‘questions’ in the NCIT (No. 5, see Annex), as well as by sentences on the government’s billboards and television spots such as ‘If you come to Hungary, you cannot take our jobs’. This issue touches upon the conflict of the migrants, on the one hand, being economically fit to be accepted in the country but, on the other, not to be in competition (for employment) with their co-nationals. Then there is the *terrorist* variant of the demonisation process. The whole NCIT was based on the assumption that migration and terrorism are inherently intertwined.

There is a correlation between immigration and terrorism. Those who arrive in Europe split from their cultural community, and we can see the consequences of this in Western Europe. They can form an unusual subculture that has the potential of becoming a deviant, fertile soil for criminality (Bence Tuzson, cf. Joób and Dull 2015).

Not surprisingly, these people are portrayed as ‘terrorists’ who pose a ‘security threat’ to the country – they are not ‘deserving’. As was sarcastically put in an article published in a non-pro-government newspaper: ‘Economic migrants are frauds. Arsonists. Thieves. Brutes. Spreaders of disease. Terrorists. And the communists like them. Get them out of Hungary’ (Dull 2015).

The terrorist framing – among others – was also found in the Slovak case by Kissová (2018) who also explored the deservingness in the political discourse regarding refugees in 2015. Furthermore, she argues that the 4 V4 countries behaved in a very similar way, so this is not a regional issue but, rather, concerns the whole CEE region. However, as we argue, the case of Hungary – with its MPB techniques and the whole context – stands out as a form of informational autocracy (Sik and Krekó 2025, in this section), which is not the case in Slovakia, Poland and the Czech Republic.

In contrast to the pro-government approach, non-pro-government media outlets took a socially sensitive approach towards refugees/migrants: refugees should not be seen as threats but should be helped. These media outlets mainly treated asylum-seekers as genuine refugees and not as ‘economic migrants’. Their counter-narrative was that the NCIT was ‘a political communication tool aimed at mobilising pro-government sympathisers and diverting attention from the country’s real (social) problems’:

Fidesz and PM Viktor Orbán have begun the divisive billboard campaign about immigration to distract from the issues of unemployment and education. ‘It is not migrants and migration that interests Viktor Orbán but the decreasing popularity of Fidesz’ (Index 2015b).

The opposition voiced that Orbán was trying to gain power through his anti-migrant policies, which he used to divert the attention from the country’s problems such as education, health care etc.

The representation of refugees in 2015

While there was no difference between pro- and non-pro-government media in terms of not giving a voice to refugees themselves, our analysis was inconclusive regarding the visualisation of migrants, as the photos were not available in the pro-government medium (*Magyar Idők*). However, other research showed that the pro-government media reinforced the anti-refugee stance of the government in their visualisation: they ‘alienated viewers from refugees by illustrating news reports with images dominated by faceless crowds, aggressive youths or people being arrested and by avoiding images which portrayed children or human moments’ (Bernáth and Messing 2015: 59). In contrast, non-government illustrations tended to focus on individuals (see Figure 3).

Figure 3. A typical illustration of refugees in 2015 in the non-government media



Source: dsz (2015).

The 'real refugees' of 2022

Contrary to previous findings from 2015, the articles did not differ significantly between pro-government and non-pro-government media outlets. Almost all articles focused on the help that Hungary or the Hungarians have offered to the refugees. The 2 most often occurring narratives were that (1) the Hungarian state welcomes and helps refugees by uniting its diverse political forces and (2) that Hungarians (the civil society) help the refugees in every possible way.

Regarding the first narrative, the main message was that Hungary is preparing to receive refugees and that the state is coordinating assistance to make their arrival as smooth as possible. This includes ensuring free health care (the government to provide medical and hospital care for Ukrainian refugees arriving in Hungary – Spirk 2022), extending the opening hours at the border crossings (Magyar Nemzet 2022a), offering a solidarity ticket ensuring free transportation for refugees on the Hungarian national railway (Magyar Nemzet 2022b) and mobilising the Hungarian Defence Forces (HVG 2022a) – thus changing the legal system. One interviewee working in an NGO summarised it as follows: 'You think of something which should be done [as a helper] and tomorrow it is already a government resolution. That was the way the spring went'. For example, on 24 February there was an article stating that the Hungarian legal system needed to be changed in order to be able to accept refugees (Farkas 2022a) and, on 25 February, there was a government *communiqué* stating that permanent asylum should be granted to Ukrainians coming from Ukraine (Farkas 2022b). This change in the law also allowed for the entry of

third-country nationals who had legal status in Ukraine. This narrative expressed the willingness of the government to help – because these people deserve solidarity. However, it is important to emphasise that not everyone was satisfied with the level of state assistance (see, for example, Doros 2022; Rényi 2022).

Regarding the second narrative, we found only small but significant differences between pro- and non-pro-government media. While the narratives of the *Magyar Nemzet* emphasised the leading role of Fidesz in coordinating the Hungarian help (via the Bridge for Sub-Carpathia or the state-governed NGO *Ökumenikus Segélyszervezet*), the non-pro-government media highlighted the key role of the Hungarian people and NGOs in providing aid (see more on this issue in Tóth and Bernát 2024). However, this difference was almost insignificant in the database.

About a quarter of the articles (N=34) were dedicated to initiatives of some prominent individuals – such as politicians (Gabay 2022) and artists (Magyar Nemzet 2022c), organisations (such as the ELTE University; see 24.hu 2022) or the University of Theatre and Film Arts (Magyar Nemzet 2022d) etc.) and companies – e.g. Airbnb (HVG 2022b), Wizz Air (HVG 2022c) – that offered help during the crisis.

As mentioned above, narratives about NGOs and civil society helping Ukrainian refugees became a hot topic from the first day of the war for 2 reasons. This was the case, firstly, since most of the asylum system was dismantled after 2015 and thus there was no institutional background to address the needs of the large number of refugees. This required the help of civil society – both formal organisations and informal networks. According to several studies, 7 per cent of the Hungarian population volunteered and, overall, 40 per cent of the population helped in some way, mostly with donations (Surányi and Sik 2025, in this section; Zakariás, Feischmidt, Gerő, Morauszki, Neumann, Zentai and Zsigmond 2023).

Secondly, civil society plays a controversial role in public discourse: since 2014, NGOs are often identified in government discourse as ‘liberal political activists’, allies of George Soros or the so-called ‘Soros army’ (see Kopper, Susánszky, Tóth and Gerő 2017; Majtényi, Kopper and Susánszky 2019). The mushrooming of reactivated (dormant since the 2015 refugee crisis) and new civic initiatives to support asylum-seekers (Tóth and Bernát 2022) led to the temporary alliance of NGOs and the government in the MPB framing: the two arch-enemies. Given the lack of institutional resources, the government found itself forced to rely on NGOs (Tóth and Bernát 2022).

The third most common narrative was that the refugees, in 2015, were undeserving ‘illegal immigrants’, whereas those fleeing from Ukraine were deserving ‘real refugees’. This narrative appeared mostly in the pro-government medium but these narratives were reinforced by the non-pro-government mediums (though without expressing agreement with – and sometimes even criticising – them).

This narrative had several themes. First, they tried to frame it in terms of age and gender. In contrast to the 2015 crisis, when it was mainly young men who crossed into Hungary (who, according to the MPB narrative, should have stayed in their country to fight), this time it was mainly (elderly) women and children who, in the eyes of many, were more deserving (although this goes against the economic aspect of deservingness as they are less likely to contribute to the economic growth of the country – Welfens 2023). The following extract from an article published in a pro-government newspaper is a good (if sarcastic) summary of all these arguments:

Looking at the painful photos of the crisis in Ukraine, one can see what a real flood of refugees looks like. It's a revealing sight: women fleeing, small children, elderly men – but no head of household. How could there be? He stayed at home to fight, to resist. And how interesting, every refugee has papers, ID cards... even if in many places they are not asked for them. Let's remember these pictures! Real refugees...

This crowd is not made up of men in their 20s smoking cigarettes and using mobile phones, most of whom, when asked, claim to be 18 years old (because they somehow 'lost' their documents while fleeing...). There are no young men with Soros bank cards and hundreds of Euros in their pockets... (Pilhál 2022).

In short, 'real refugees' have to be poor and have legal documents – this makes them more deserving. Pilhál (2022) continues with the basic MPB frame: 'A refugee is only a refugee until the first safe country, after that he is a tourist. And anyone who tries to enter the third country illegally, without papers and by force is a terrorist'. Hungary welcomes 'real refugees' from Ukraine because they come from a neighbouring country and at the border they 'behave well':

(...) the most fundamental human right is the right to safe and peaceful living conditions and this right of the Ukrainian people has been seriously violated, with many of them having to leave their homes. (...) All border crossings are open, all Ukrainian citizens and those who have been legally present on the territory of Ukraine are allowed to enter... and that Hungary, as the first safe country, was doing its duty to help them. The minister (...) refused to draw any parallels between refugees from Ukraine and illegal migrants. Illegal migrants often behave aggressively and want to cross the green border but refugees from Ukraine come to the border crossing points and wait in a disciplined and patient manner (Magyar Nemzet 2022e).

This is exactly what one of our interviewees expressed in a sarcastic way:

This is how a refugee should look (...) the man stays home, defending the house, and the child and the women come with blue eyes cried out, blondies and politely standing in queue at the border and very grateful for the help distributed to them. And we do everything we can to help etc.

In 2015, however, a pro-government politician described it as follows: 'Illegal migrants were streaming across our southern borders... only men of working or military age, as they say, men in a closed formation, in mass groups, which obviously does not show the picture of those fleeing war, but of those going to war, to any right-thinking person'.

This is related to knowledge of the cause of the crisis: while, in 2015, Hungarians were not fully aware of the reasons why so many people from Africa and Asia were on their way to Europe, by 2022 Europe had been closely following the crisis that has been unfolding since 2014 and which culminated in February 2022. Therefore, the likelihood of knowing why Ukrainians were fleeing was much higher and since most governments were pro-Ukraine, it was easier to sympathise with them.

A pro-government expert used the same argument in the interview when explaining why the government did not change its narrative between 2015 and 2022: now refugees arrive in Hungary as their first safe country, compared to migrants in 2015 who came mostly through Serbia, which the government considers to be a safe country. This argument, however, does not contradict the government's unspoken claim of deservingness: while the migrants in 2015 were undeserving because of their cultural and civilisational deviation from the homogeneous Hungarian society, in 2022 they were deserving because of the civilisational similarity and the clarity of the reason for their flight (fleeing from war).

A fourth, albeit marginal, narrative was that the Carpathian Roma did not get enough help. Discrimination against Roma refugees (Bokros and Galicza 2022) posited that they were 'the least likely

to receive better accommodation and care' (Tóth and Bernát 2024: 284). However, this issue was only mentioned in the non-pro-government media. In the pro-government media there was one article about the Roma, which also said how much help they received.

The fifth, also marginal, narrative was that Hungary wanted to stay out of the war because it stood for peace. This was one of the main government narratives about the war and it appeared as early as the first week. One non-pro-governmental interviewee illustrated lucidly the misuse of a historical narrative of Hungary (defending Europe as the 'last bastion' of the Ottoman Empire): whereas, in 2015, Hungary was 'the last bastion of Europe defending Christianity', in 2022 it was 'the last bastion of peace'.

The representation of refugees in 2022

Despite the generally similar narratives, the representation of refugees in the pro-and non-pro-government media differed significantly. While there were several articles in the latter that quoted the refugees, we found only one article in the pro-government medium that gave them a voice.

The framing of the crisis can also be captured by the labelling technique: compared to the 2015 refugee crisis, where those arriving were often referred to as (illegal) migrants, in 2022 it was almost unanimously agreed that these were people fleeing from war and were deserving refugees, therefore, the term 'migrant' almost never occurred (Table 2).

Table 2. The proportion of the 3 main labels in the pro- (48 articles) and non-government media (76 articles) – % of all mentions

Words	Pro-government (N=139)	Non-government (N=261)	Total (N=400)
Refugee (<i>menekült</i>)	93	87	89
Asylum- (<i>menedék-</i>)	4	13	10
Immigrant (<i>migráns, bevándorló</i>)	3	0	1
Total	100	100	100

Looking at the photos, we identified 2 types. If the photo illustrated the refugees (Figure 4), there was no difference between the pro- and non-pro-government media. However, when the photo illustrated something else, in the pro-government media it was usually a politician, in the non-pro-government media, it was either related to the war (soldiers) or a screenshot of a Facebook post (an announcement they wanted to share).

Figure 4. A typical illustration of refugees in 2022

Source: Papp (2022).

Conclusion

In this paper we present the qualitative analysis of 2 case studies – the national consultation in 2015 and the Ukrainian refugee crisis in 2022 – of how the Hungarian pro-government and non-pro-government media approached the selected issues. Our aim was to illustrate the changes (if any) in the narratives. Since our understanding is that Hungary is an informational autocracy where the government presses the moral panic button whenever it deems it necessary, our analysis looks at both the pro-government channels (the mouthpieces of the government) and the non-pro-government channels (where these narratives should not be dominant).

From these content analyses we learnt that, while, in 2015, the refugees were perceived as illegal immigrants, mostly Muslims (i.e. potential terrorists) coming from outside Europe, who do not deserve our help, in 2022 the main understanding was that they were (European) people (asylum-seekers/refugees) who were fleeing war and therefore deserved the temporary help provided. While, in the first case, there was a sharp contrast between ‘them’ and ‘us’ (Hungarians or Europeans), in the second case, both Ukrainians and Hungarians were part of ‘us’, therefore they deserved our help.

In 2015, we consistently found only the pro-government narrative in the pro-government media. There was a clear division/opposition between pro-government and non-pro-government media: the focus of the former was to show that the refugees crossing into Hungary were illegal immigrants who did not deserve help. Other narratives appeared in the non-governmental media under the theme of solidarity.

In 2022, all those who arrived were treated as victims of war and therefore could be trivially considered as ‘real refugees’ in contrast to the ‘mix of masses’ during the refugee crisis of 2015. This difference was reinforced by comparing the social indicators (age, gender, culture, religion etc.) of the 2 populations: the

former were mostly single young males with Muslim/Arab backgrounds and the latter mostly women and children – often families with Ukrainian backgrounds.

These differences explain why, in 2022, both pro-government and non-pro-government media shared the same main narratives. The only narrative difference was related to the role of the state versus that of civil society: the pro-government media emphasised the leading role of Fidesz in coordinating the Hungarian help; the non-pro-government media highlighted the key role of the Hungarian people and NGOs in providing it. The portrayal of the refugees was also similar in all mediums but, in the non-pro-government media, the refugees were given more voice than in the pro-government media.

The Hungarian government has tried to posit that they did not change their main narrative between 2015 and 2022: it will only accept people in the country for whom this is the first safe country. This claim is only valid if we accept that Serbia can be considered as a safe country, which was not necessarily the position of the international organisations.⁶ In 2022, however, the Hungarian government added another narrative to their still dominant anti-migrant MPB one: the differentiation between deserving and undeserving refugees, which was largely based on several aspects such as social, cultural and economic indicators.

Notes

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2. See Vohra (2023).
3. Excluding those where they wrote about Ukrainian refugees fleeing to Romania and Poland or where they wrote about other border crossings, not connected to the Russian invasion of Ukraine.
4. The following paragraphs refer to the database with articles containing the term 'national consultation' (N=831) from which we selected the articles for qualitative analysis.
5. The ratio refers to those articles in which the given term is mentioned at least once.
6. https://www.hrw.org/sites/default/files/world_report_download/wr2016_web.pdf;
<https://www.amnesty.org/en/documents/eur70/1579/2015/en/>.

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Shaping Migration Discourse: A Text Analysis of Prime Minister Viktor Orbán's Speeches

Zsófia Rakovics*, Zsuzsanna Boda**

Migration policies have been a highly contested issue in Hungary, with political actors playing a pivotal role in shaping public opinion. This study examines the discourse on migration in the 1,421 English-language speeches of Hungarian Prime Minister Viktor Orbán from January 2014 to December 2023. The research aims to enhance the understanding of migration-related rhetoric in political communication by employing natural language processing and quantitative text analysis techniques. Grounded in a theoretical framework of political discourse and migration narratives, the study explores shifts in the relative frequency and temporal patterns of key migration-related terms. Specifically, it analyses the usage of the terms 'refugee', 'immigrant', 'migrant', 'migration' and 'immigration', comparing their prevalence in speeches delivered within Hungary and on the international stage. The findings reveal significant shifts in Orbán's migration rhetoric – notably, a decline in the use of the words refugee and immigrant in favour of migrant (which was not commonly used before). These results provide empirical evidence of discursive changes over time, contributing to a broader understanding of how political leaders strategically adapt their language to influence public perception. By contextualising these linguistic trends within Hungary's sociopolitical landscape and in relation to previous research on political communication, this study offers valuable insights into the evolving role of migration discourse in political rhetoric. The findings also serve as a methodological contribution to the study of political speech analysis through computational text analytics.

Keywords: Prime Minister Viktor Orbán, Hungary, migration discourse, migrants, natural language processing, quantitative text analytics

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Introduction

Many factors play a role in shaping the public opinion of the Hungarian population, including the values represented by the country's politicians and government, which reach people through different communication channels and in different forms. The study of migration is a particularly good example with which to illustrate this. The research aims to contribute to the exploration of the way in which migration is discussed by analysing the speeches of Prime Minister Viktor Orbán in English, available online, between January 2014 and December 2023.

Migration is constantly shaping our world, social interactions and political processes and, with the emergence of modern states, there is a growing political need in some countries and, to some extent, to limit migration and strengthen border protection. A wave of refugees on an unprecedented scale reached Hungary's borders in 2015, challenging the country and Europe as a whole. The government's decisions at the time included building a southern border fence and launching a National Consultation¹ and Referendum on resettlement quotas and migrants (also known as the Quota Referendum²). It was during this period that Viktor Orbán's narrative changed and his communication on refugees became a tool of his political strategy. This type of communication – centred around National Consultations, politicised information campaigns and the strategic use of the moral panic button or MPB – not only reshaped the media landscape and contributed to the rise of xenophobic attitudes among the Hungarian population but also significantly strained Hungary's relationship with European institutions (Gerő and Sik 2020; Sik 2016a). The government's persistent anti-Brussels rhetoric, framed as a defence of national sovereignty against external interference, fostered a hostile narrative that positioned the European Union as an adversarial force. This antagonistic stance not only deepened domestic polarisation by reinforcing in-group/out-group divisions but also challenged the normative and institutional foundations of Hungary's EU membership (Gerő and Sik 2020; Sik 2016a).

Mapping and researching the messages in these speeches is particularly important not only for the reasons mentioned above but also because it defines the narrative of a country's government, which can also influence the political attitudes of the population (Barna and Koltai 2019; Sik, Simonovits and Szeitl 2016). The consciously planned and thoroughly built narrative changed drastically for the second time when Ukrainian refugees arrived in Hungary due to the Russian invasion of Ukraine. A differentiation between 'real' refugees and migrants was made by the Hungarian Prime Minister to counterpoint the previous, dominantly negative narrative on immigrants. Melegh's article (2024) provides empirical evidence that the term 'refugee', which had previously been used less frequently, became more prevalent in articles by Hungarian media outlets during the Ukrainian crisis. The term 'Ukraine' was also added to these articles to facilitate understanding of the war-related events. The Prime Minister altered the discourse and demonstrated a capacity for agile adaptation in response to the prevailing circumstances.

The study examines the evolution of migration-related terms over time. Using basic descriptive tools associated with natural language processing and quantitative text analytics, the analysis provides an account of the migration-relevant aspects of Orbán's speeches available online. We cover the social context of the issue of immigration and previous analyses of political communication related to it. We also describe how we conducted quantitative text analysis based on the theoretical framework. Further, we point out the changes in the relative frequency and temporal dynamics of words of particular relevance to migration. The keywords identified for the research include 'refugee', 'immigrant', 'migrant', 'migration' and 'immigration'.³ Note that the Hungarian word for 'migrant' (*migráns*) is a foreign-sounding loanword, unlike the more native-sounding 'immigrant' (*bevándorló*) or refugee (*menekült*). This lexical

distinction has contributed to the stigmatisation of the term 'migrant' in public discourse, making it easier for governmental narratives to associate the term with threat, disorder or illegitimacy. In this context, Sik's concept of the 'moral panic button' (Sik 2016a, b) is also highly relevant: it refers to a deliberate communication strategy that activates collective fear and anxiety by presenting migration as an existential threat. This mechanism plays a central role in Hungary's political communication, enabling the government to mobilise support, suppress dissent and consolidate control by appealing to emotional rather than rational responses.

We believe that the results of the analysis can be used to identify at what point Viktor Orbán's political communication changed, when the use of the words 'refugee' and 'immigrant' became less prominent and when the term 'migrant' became dominant in speeches. We also reflect on previous research findings relevant to the Hungarian case, as the results of the current research fit nicely with these.

Theoretical overview: Governmental and prime-ministerial narrative on immigration

In the aftermath of the 2008 economic crisis, the 2010 parliamentary elections witnessed the victory of the Fidesz–KDNP party coalition, which secured a two-thirds majority. The nomenclature 'Fidesz' is an abbreviation for 'Fidesz – Hungarian Civic Alliance'. The political party known as Fidesz was established in 1988 under the name 'Alliance of Young Democrats'. The Hungarian abbreviation KDNP signifies the Christian Democratic People's Party. In 2010, the KDNP joined Fidesz in the Hungarian parliament, thereby becoming a constituent of the ruling party coalition. Since that time, the 2 parties have maintained their position in power. In this study, the term 'Fidesz' is preferred in place of 'Fidesz–KDNP' because Fidesz, with its leader, Viktor Orbán, plays a more significant role in shaping the political public sphere in Hungary than the KDNP. It is Fidesz and the Hungarian Prime Minister Viktor Orbán who make decisions and, as the KDNP does not have a dominant political profile or agenda, the party does not participate in the national elections individually.

As a result of winning the national elections in 2010, the party coalition began governing without any significant opposition, transforming the country's economic and social landscape. During his premiership, Viktor Orbán began to build his policies on '*Hungarian values*', based on '*millennial cultural dominance*' (Tölgyessy 2014: 643).⁴ The political transformation started a process of turning social groups and members of different generations against each other while, at the same time, the relationship between Europe and Hungary was weakening (Glied and Pap 2017). In order to counteract this, the former voiced themes and principles that the people of the country could be expected to agree with, including fear-mongering generated by immigration (Bocskor 2018).

As Endre Sik summarises in his studies (Sik 2016a, b), the 2015 National Consultation on Immigration and the way in which the result was announced⁵ was a moral panic button – a regular, even gradually reinforced message based on real or created threats. These messages appeared again and again on various media platforms, sometimes moving away from the issue of migration towards George Soros⁶ and Brussels. The success of these billboards was not only based on the fear of terrorism but also economic aspects ('*If you come to Hungary, don't take away the jobs of Hungarians!*') and possible cultural effects ('*If you come to Hungary, you must respect our culture!*'⁷). The main narrative that emerged from the referendum was blaming Brussels – and the liberal European elite – for their inability to defend their own borders.⁸ The other main narrative focused on threats, highlighting terrorism and violence⁹ (Glied and Pap 2017). Despite the government's efforts and Billboard Campaign,¹⁰ the October 2016 referendum on the quota was invalid, as fewer than 50 per cent of voters participated. Nevertheless,

Fidesz considered the event a political success, as 98 per cent of those who participated in the referendum voted against the quota.

The arrival of a significant wave of migrants at the southern border in 2015 was a Europe-wide challenge. From the beginning, the governing party prioritised communication about the problem, building an anti-immigrant narrative that culminated in the referendum on the resettlement quota in October 2016 (Glied and Pap 2017). In an interview with the Prime Minister in the summer of 2015, Viktor Orbán said that, if Western Europe could not protect the continent, Hungary would protect its own borders with a fence.¹¹ With the current location of the Schengen southern border in Hungary, the Prime Minister painted the country as the guardian of the southern border of the whole of Europe, emphasising its historical identity as the bastion of Europe (Glied and Pap 2017: 140). The Prime Minister thus did not only physically create a fence separating Hungarian society from migrants; he also distinguished Hungarian national independence from European solidarity, as well as illiberal democracy from the functioning of European states – and religious tolerance from liberalism (Sata 2020: 72).

By the autumn of 2015, the government's communication had taken a new direction and the focus had shifted to the impossibility of coexistence and the difficulties and dangers of a multicultural Europe, a message that was strongly underpinned by the terrorist attack in Paris in November 2015 (Glied and Pap 2017: 141). As argued by Kiss (2016: 45), the 'controversial anti-immigration campaign, which consisted of two main elements: the National Consultation on Immigration and Terrorism and a connected Billboard Campaign (...) crucially shaped the perception of migration and asylum issues in Hungary'. According to Kiss (2016), this campaign not only framed migration as a security threat but also served as a central tool in constructing a politicised and emotionally charged public discourse. Through state-sponsored messaging and selective media representation, it contributed to the stigmatisation of asylum-seekers and reinforced a binary moral framework that positioned the government as the protector of national identity against an external, culturally incompatible threat (Kiss 2016).

The role of the governing party's communication may have been significant in the fact that previously neutral words such as 'migrant' were attached to negative connotations and became hostile terms (Barna and Koltai 2019: 52). The result of such conscious communication was that refugees became confused with immigrants, illegal immigration with legal immigration, and migration with terrorism (Glied and Pap 2017: 144). In recent years, several studies have examined how Viktor Orbán's speeches are followed up in the pro-government press, as well as the changing image of migrants and anti-immigration discourse in different media (Benczes and Ságvári 2022; Bernáth and Messing 2015; Bocskor 2018; Glied and Pap 2017). A constant element in these pieces of writing is how the word 'refugee', which expresses solidarity, is replaced by the term 'migrant', which was previously absent from the Hungarian language: a foreign word which, in itself, means foreigner (Benczes and Ságvári 2022). Benczes and Ságvári have also dealt with the differences in the meaning of the words 'immigrant', 'migrant' and 'refugee' – according to their hypothesis, 'migrant', the new term, has more diverse representations in the media than the other 2 words under study – a phenomenon we will also deal with in the research through the speeches. It is possible and worthwhile to draw parallels between the communication of the governing party media and the speeches of Viktor Orbán, since 'an important characteristic of the Hungarian news media is that it is almost exclusively political discourse that determines both its language and its characteristic settings' (Bernáth and Messing 2015: 7).

However, it is not only Hungarian researchers who have examined political discourses on migrants: for example, Sata (2020) found that Hungary stands out among countries for its extreme anti-immigration communication, despite not being a primary destination for the majority of immigrants

but, rather, a sending country. Sata's research analysed the speeches of Viktor Orbán from 2010 (when Fidesz came to power for the second time). The results show that, between 2010 and 2014, the main theme of the speeches was the economy, typically focusing on the country's borders. Already by then, however, Christianity had emerged as a cardinal element of Hungarian identity, which Viktor Orbán's speeches suggest is under threat from political and intellectual trends originating in Western Europe (Sata 2020: 62). This latter author draws attention to the differences in meaning already discussed in the literature that has been presented. In his experience, there were 5 times as many mentions of the words 'migrant' and 'immigrant' as of 'refugee'. Due to this shift, immigrants are not portrayed as fallen and in need of help but as having come to the country for the expected economic benefits. Mention of the words 'threat', 'protection' and 'security' also increased several times in the period under review compared to previous years (2010–2014). Sata found that, since the change of government in 2010, the focus of the speeches has involved a consciously constructed crisis, to which parallels may be drawn with the moral panics and crisis communication discussed earlier (Gerő and Sik 2020). Another international collaboration (Korkut and Fazekas 2023) examined Hungary's response to the Ukrainian refugee crisis through 2 key lenses: first, they considered how the country's ties with Russia have influenced its stance on Ukraine, shaped in part by domestic political interests. Second, they contrasted Hungary's handling of Ukrainian refugees with its earlier approach to migrants from the Middle East, highlighting shifts in its migration policies. Their study (Korkut and Fazekas 2023) also explored how political leadership and broader governance dynamics have influenced Hungary's reception strategies and migration discourse. These international sources help to situate the current study within a broader scholarly context.

Research questions

The main research questions for the study are presented below based on the Introduction and Theoretical overview sections. To answer these questions, an analysis of the frequency of keywords related to the topic was carried out, complemented by a deeper interpretation of the texts, looking at the subtle differences in meaning. The study addresses the research question: How has the frequency of keywords relevant to migration changed in Viktor Orbán's speeches in the examined 10-year period between 2014 and 2024? In other words: What dynamics can be observed in the use of words related to the topic? The analysis related to this question was conducted along the lines of the literature discussed in the Theoretical overview section, involving an examination of whether the anti-migrant narrative strengthened over time (Sata 2020) and whether the central messages were developed and reinforced by the government's Billboard Campaign (Gerő and Sik 2020; Sik 2016a).

The hypothesis is that the frequency of the words under study has changed significantly over the period of analysis and that the messages that can be detected in government communication also appeared in the speeches. Based on the literature we reviewed, we hypothesised that the use of the term 'migrant' would predominate in the portrayal of immigrants compared to the more neutral terms 'immigrant' and 'refugee' and also that the deliberate shifts in the political narrative (for example, building up George Soros as an enemy, talking about Muslims as a threat and mentioning terrorism) could be detected in the frequency of the use of the corresponding keywords.

Methodological overview

Corpus and database

The analysis was conducted on the corpus of speeches of Viktor Orbán in English (either those delivered in English or official English translations), which is publicly available online. The corpus contains texts collected from the <https://miniszterelnok.hu/en/> website and its archive(s). It includes speeches from January 2014 to December 2023 – a total of 1,421 individual texts. The database containing the text corpus also contains metadata – variables that record the circumstances under which the speech was given (for example, when, where and under what title Viktor Orbán gave the speech) – which data are also publicly available on the linked websites. Table 1 shows the distribution of the analysed speeches by year.

Table 1. Number and proportion (%) of prime-ministerial speeches by year

Year	Number of speeches	Proportion (%) of speeches
2014	126	8.9
2015	134	9.4
2016	174	12.2
2017	224	15.8
2018	227	16.0
2019	170	12.0
2020	148	10.4
2021	80	5.6
2022	83	5.8
2023	55	3.9
Total	1,421	100.0

Methods applied

This section describes the methodological framework of the research. As discussed in the *Corpus and database* and *Research questions* sections, the analysis was conducted on the corpus of publicly available online speeches of Viktor Orbán. In the quantitative data analysis, we relied on pre-processing routines used in natural language processing and on quantitative text analysis methods based on word frequency and the use of bag-of-word models. The focus of the analysis was keywords relevant to the topic; the words ‘migration’, ‘immigration’, ‘migrant’, ‘immigrant’ and ‘refugee’ were awarded a prominent role in the analysis. We follow the methodological framework of a prior analysis in Hungarian (Boda and Rakovics 2022) but examine a more recent, 10-year period (2014–2024) of the English-language speeches of the Hungarian Prime Minister Viktor Orbán. In so doing, we contribute to the previous analysis by Boda and Rakovics and disseminate the results of a similar methodological approach for an updated period in the English language.

This section provides a methodological overview of the text analytical tools and text mining used for research, from the steps preceding the analysis to the procedures that were used. One of the key steps in text-mining analysis is the process of pre-processing texts, one of the aims of which is to establish the effectiveness of the analysis (Tikk 2007). One of the basic text-processing steps is tokenisation, whereby a document is broken down into a set of text units, called tokens, which are textual instances of a character

sequence. The other basic pre-processing step is lemmatisation, which is used to find the normalised or dictionary form of words. Part-of-speech recognition is also a procedure commonly used to understand the grammatical role of each word in a sentence. An important tool in text preparation is the compilation of stop words – which do not carry information of value for analysis – such as conjunctions and fillers (Tikk 2007). The pre-processed text corpus was produced after, among other things, implementing the above procedures and contained already cleaned texts.

The toolbox of text quantitative analytics is rich, with a variety of approaches and methods to suit the research questions. One of the simplest approaches is based on the *bag of words* model, whereby the frequency of words in a corpus is examined without recording information on their position and order within the text (Tikk 2007). This type of approach can be useful in a research project that examines which words are prominent in the texts under study and how often they appear in them. We chose this approach, focusing the analysis on keywords related to the topic of migration. Based on theoretical considerations, we looked for words and phrases that typically occur when discussing the topic. By examining the observed frequencies of occurrence for each period we can, in a sense, trace the temporal dynamics of the appearance of words – and this is what we examined in the analysis.

To standardise and better compare word frequencies, the length of utterances was also taken into account in the analysis and relative frequencies were calculated by dividing the observed frequencies by the number of words. Differences in the frequencies of word use were also analysed using statistical tests. In principle, we relied on established quantitative data analysis procedures. When examining the average word frequency of different types of speech, independent sample t-tests were used to inspect the frequency of a selected keyword in 2 different types of speech. When studying the typical occurrence of the highlighted word pairs, paired sample t-tests were employed to analyse differences in meanings. Results were generally presented using bar and line graphs. Data pre-processing was performed in R and text analysis in SPSS.

Examining the weighted word frequencies of keywords is relevant when trying to explore the empirical patterns observed in the prime ministerial speeches but may have limitations. It is considered a somewhat quantitative approach that could be complemented with qualitative analysis in order to gain a deeper understanding of the matter. We deliberately applied quantitative text analysis and targeted quantitative investigations because the previous research analysing Viktor Orbán's speeches from the perspective of migration focused more on the qualitative aspects of the topic. Therefore, the current analysis could be considered a valuable contribution, complementing the pre-existing methodological framework in the study of the topic of migration in the speeches of Prime Minister Viktor Orbán.

Results

We first analysed the relative frequency of general keywords relevant to migration, such as 'migration', 'immigration', 'migrant', 'immigrant' and 'refugee', in the speeches of Viktor Orbán between January 2014 and December 2023. We then analysed the words that fall under the broader framework of the topic. The extended theme identified several keywords that were among those used in the National Consultations launched by the government and in the Billboard Campaigns, such as 'Brussels', 'Soros', 'Hungary', 'Hungarian', 'homeland', 'faith', 'religion', 'religious', 'Catholic', 'Muslim', 'culture' and 'tradition'. The following words, which appear in the speeches and have a negative connotation in relation to immigrants were also included: 'enemy', 'adversary', 'rival', 'violence', 'violent', 'threat',

'attack', 'terrorist', 'terrorism', 'danger', and 'dangerous' (see Note 3 for a full list of the words that were analysed).

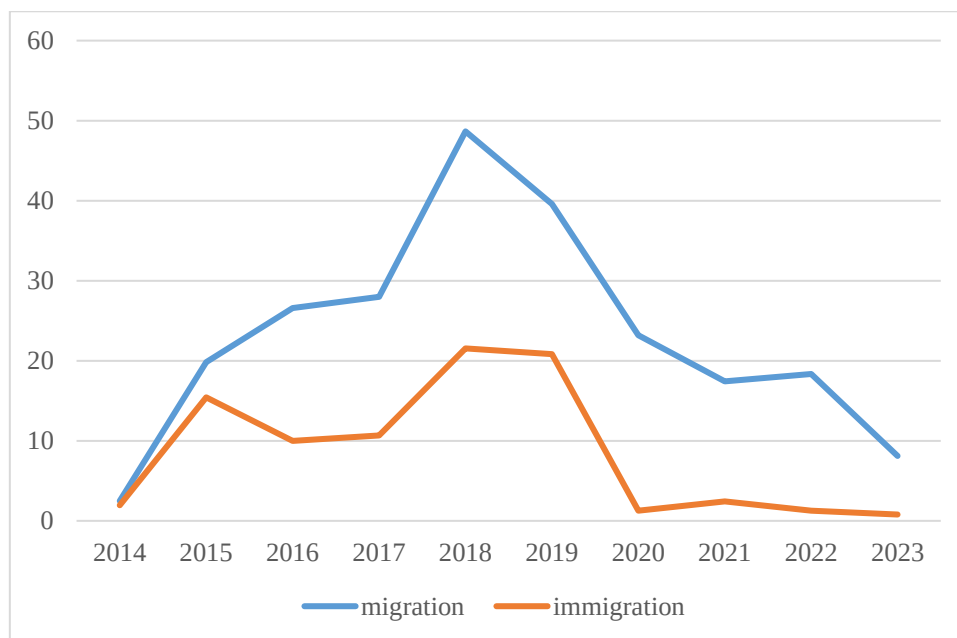
We examined the dynamics of the use of related terms in all online speeches available for a given period and the differences in average word frequencies, thus studying and interpreting the differences in political communication. The quantitative data analysis related to the research question is summarised in the following subsection.

Examining the word frequency of keywords

Differences in the use of the terms 'migration' and 'immigration' were tested using a paired sample t-test to see if there was a statistical difference in relative word frequencies across all the speeches in the given period. A significant ($p < 0.001$) difference (0.1 percentage points) was found when analysing the relative frequencies of the 2 keywords, with the word 'migration' (mean = 0.16 per cent, standard deviation = 0.37, maximum = 3.4 per cent) scoring higher than that of 'immigration' (mean = 0.06 per cent, standard deviation = 0.18, maximum = 2.0 per cent). The result is well-aligned with what has been reported in the theoretical literature, with Prime Minister Viktor Orbán preferring the use of the term 'migration' over 'immigration' in his speeches.

Plotting the results over time (Figure 1), while the weighted annual occurrence of 'immigration' and 'migration' were similar in 2015, following that date the weighted annual frequency of 'migration' became more dominant.

Figure 1. Weighted annual occurrence of the words 'migration' and 'immigration'



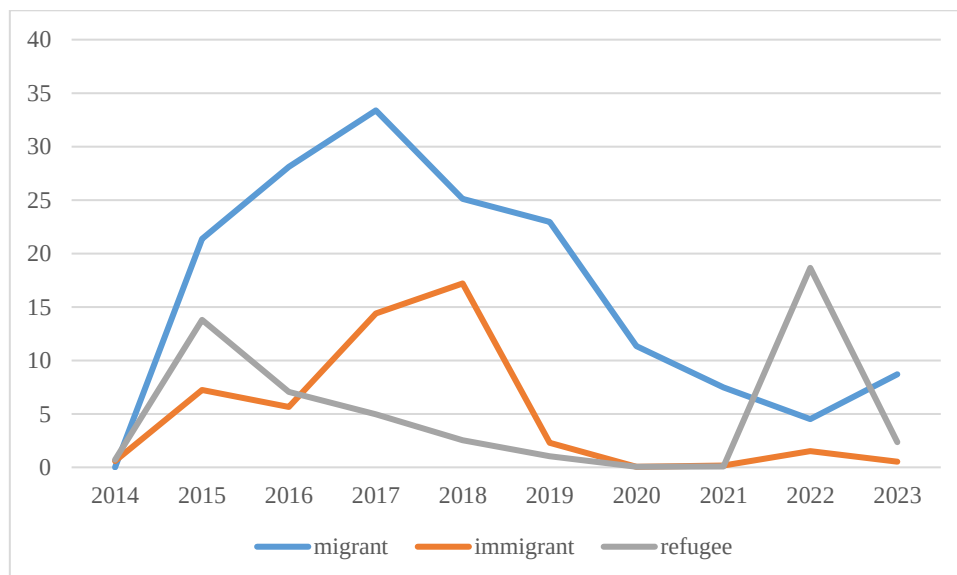
The weighted annual frequencies started rising in 2016 and, thereafter, the term 'migration' was used more frequently than ever before in Viktor Orbán's speeches – in 2017–2018 (27 and 28 times, respectively) – and reached its peak in 2018 (49). The trend then broke, with the weighted annual occurrence of 'migration' being 40 in 2019 and 23, 17, 18 and 1, in 2020–2023 respectively.

For the pairing 'refugee' and 'migrant', the t-test significance value ($p < 0.001$) showed a statistical difference (0.08 percentage points) in the mean relative word frequencies; the average occurrence of

'migrant' was 0.12 per cent (standard deviation = 0.26, maximum = 3.29), while that of 'refugee' was 0.04 per cent (standard deviation = 0.24, maximum = 6.25). For the pair 'immigrant' and 'migrant', the test was also significant ($p < 0.001$), with the observed difference (0.08 percentage points) in favour of the latter; the mean of the relative prevalence of the term 'immigrant' was 0.04 per cent (standard deviation = 0.15, maximum = 2.12) and, of the term 'migrant', 0.12 per cent (as detailed before). There was no significant difference when comparing the relative frequencies of the terms 'refugee' and 'immigrant' together.

The results were plotted over time for the keywords 'refugee', 'immigrant' and 'migrant' and the same trend as above can be observed. By 2015, the use of the former 2 had significantly diminished, and the term 'migrant' had come to the fore. The weighted annual occurrences of these keywords by year are summarised in Figure 2.

Figure 2. Weighted annual occurrence of the words 'migrant', 'immigrant' and 'refugee'

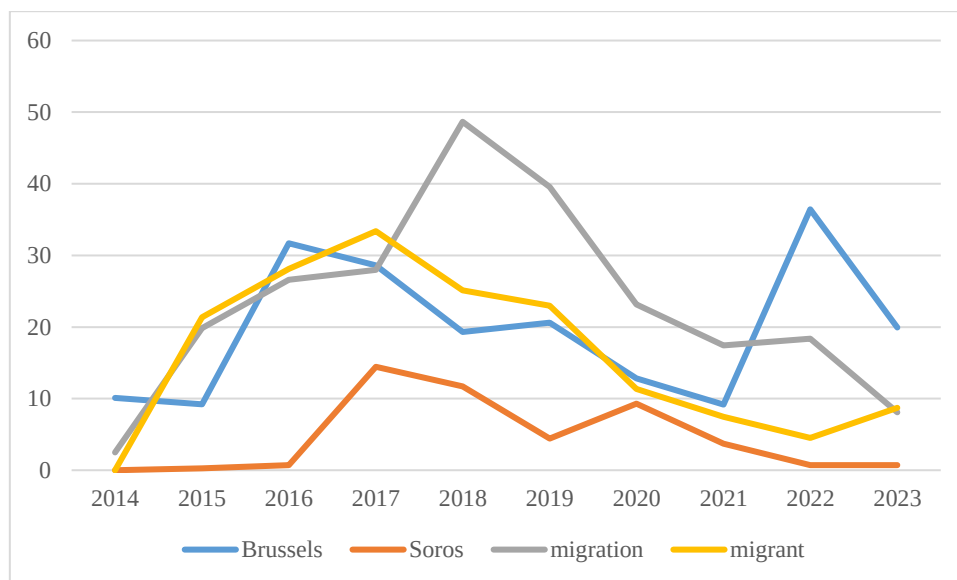


As expected, the weighted annual frequency of these words started to increase after 2014 – when the wave of refugees started – and the use of the term 'refugee' in 2015 was quite frequent (14 occurrences), before 'migrant' and 'immigrant' became more dominant. The term 'refugee' peaked in 2022 at the time of the invasion of Ukraine by Russia, when thousands of refugees arrived in Hungary from the neighbouring country. The phrase 'migrant' appeared in the speeches from 2015 onwards; the weighted occurrence was 21 and 28 in 2015 and 2016 respectively. The word 'migrant' had a maximum value of 33 in 2017, following which a decline was observed until 2022 (the values were 25, 23, 11, 7 and 5), and in 2023, 'migrant' again became more used and the annual weighted frequency increased to 9. The use of the word 'immigrant' reached its peak between 2017 and 2018 (14 and 17, respectively) and was then used less frequently.

These results fit nicely with those found in previous research and the literature cited in the Theoretical overview section reports a similar trend. All this clearly shows that, from 2016 onwards, Viktor Orbán favoured the use of the term 'migrant' in his speeches, except for the year 2022 – the Russian invasion of Ukraine – when 'refugee' was more dominant. In line with the results of previous research, we see the outcome of conscious strategic communication; the deliberate marginalisation of

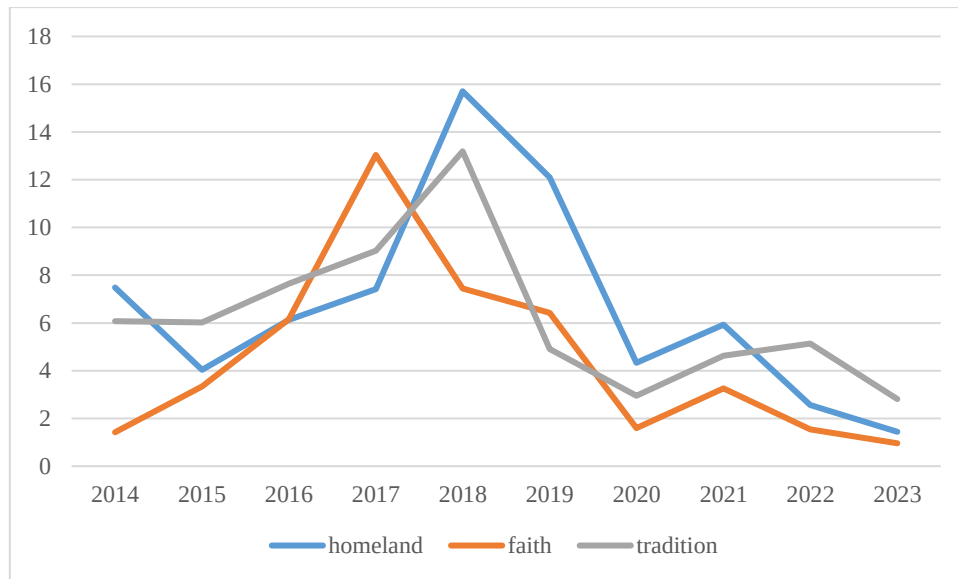
the empathetic words ‘refugee’ and the more neutral ‘immigrant’ and an increase in the use of the term ‘migrant’, in line with political strategy and evoking a preconditioned emotional charge. We also analysed the frequency and temporal dynamics of the words ‘Brussels’, ‘Soros’, ‘migration’ and ‘migrant’, which appear in National Consultations and Billboard Campaigns (Figure 3).

Figure 3. Weighted annual occurrence of the words ‘Brussels’, ‘Soros’, ‘migration’ and ‘migrant’

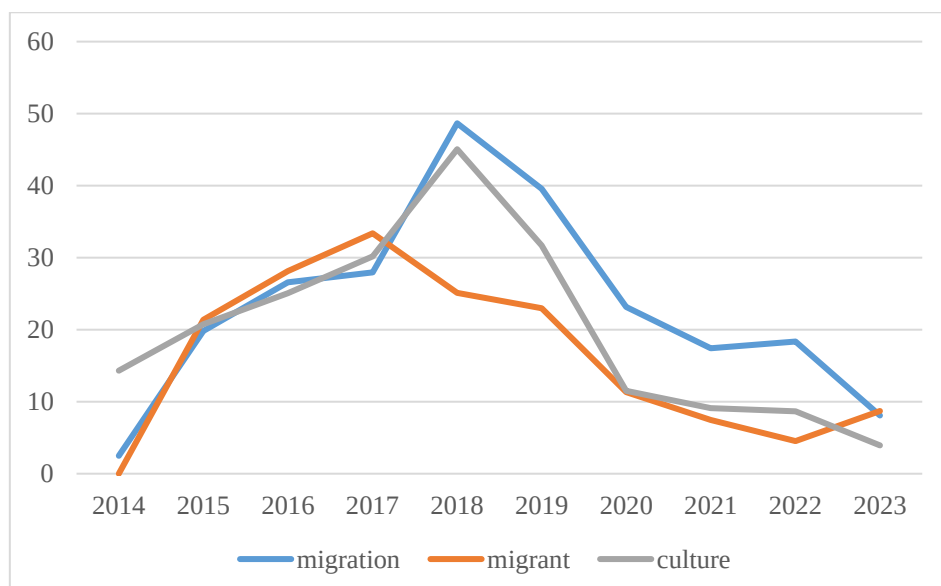


The term ‘Brussels’ is used in several of Viktor Orbán’s speeches to refer to the European Union in general; the weighted annual frequency of the word was 10 and 9 in 2014 and 2015 respectively. The local maximum occurred in 2016 with 32 mentions, then a decrease was observed: 29, 19, 21, 13 and 9 between 2017 and 2021. In 2022 – the year of the elections – use of the term ‘Brussels’ reached its maximum within the examined 10-year period with 36 mentions and, in 2023, 20. Reference to George Soros first appeared in 2016, then peaked in 2017 with a weighted occurrence of 14 while, in 2018, the observed value was 12. The year 2019 witnessed a local minimum (4) and from then onwards, the values were as follows: 9, 4, 1 and 1 between 2020 and 2023 respectively. Studying the series of ‘Brussels’ and ‘Soros’ together with ‘migrant’ and ‘migration’ revealed that the terms ‘Soros’ and ‘migrant’ co-occurred, especially between 2016 and 2018. Note that this was the period of the ‘Stop-Soros’ Billboard Campaign. Examining the co-occurrence of ‘Brussels’ and ‘migration’ shows periods of synchronisation – for example, between 2015 and 2017, 2019 and 2021 and 2022 and 2023.

The words ‘homeland’, ‘faith’ and ‘tradition’ were among those typically used in the political campaigns of the Orbán government (the National Consultations and the Billboard Campaigns), so we studied them as well. Figure 4 shows the weighted annual frequency of these words.

Figure 4. Weighted annual occurrence of the words ‘homeland’, ‘faith’ and ‘tradition’

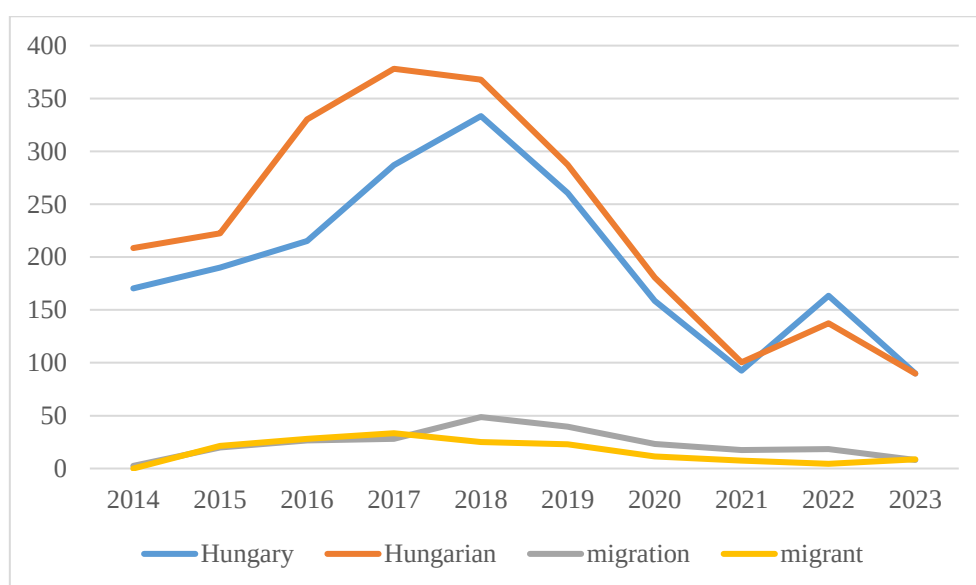
The annual weighted frequency of the term ‘homeland’ dropped from the value observed in 2014 (7) to 2015–2016 (4 and 6, respectively) but then, in 2017–2019, it was more frequent (7, 16 and 12) in the prime ministerial speeches, while between 2021 and 2023 it declined. The word ‘faith’ reached its peak in 2017 when the maximum of the weighted occurrence was 13; before and after that year, the values ranged between 1 and 7, with a slightly different dynamic: the years 2016, 2018 and 2019 saw higher weighted frequencies (6, 7 and 6 respectively), while 2014, 2015 and 2020–2023 saw lower ones. Use of the word ‘tradition’ increased between 2014 and 2018 (6, 6, 8, 9 and 13, respectively) and then dropped between 2019 and 2020 (5, 3), stagnating at around 4–5. Although ‘migration’ is not represented in this illustration, the peaks of the examined keywords ‘homeland’, ‘faith’ and ‘tradition’ were synchronised with the weighted annual occurrence of ‘migration’.

Figure 5. Weighted annual occurrence of the words ‘migration’, ‘migrant’ and ‘culture’

The following was true for the term ‘culture’ as well, which condensed a complex message. Therefore, Figure 5 demonstrates the co-occurrence of ‘migration’, ‘migrant’ and ‘culture’. The latter keyword was an integrated part of the billboard and political communication campaigns.

The word ‘culture’ was already associated with a relatively high weighted annual occurrence in 2014 (14) and then increased constantly until 2018 (21, 25, 30, then 45 mentions), respectively. The absolute maximum within the examined period was observed in 2018. Following that, the weighted annual frequency declined to 32 in 2019 and then to 11 in 2020. The values stagnated at 9 for 2021 and 2022. The latest observed weighted occurrence was 4 in 2023.

Figure 6. Weighted annual occurrence of the words ‘Hungary’, ‘Hungarian’, ‘migration’ and ‘migrant’

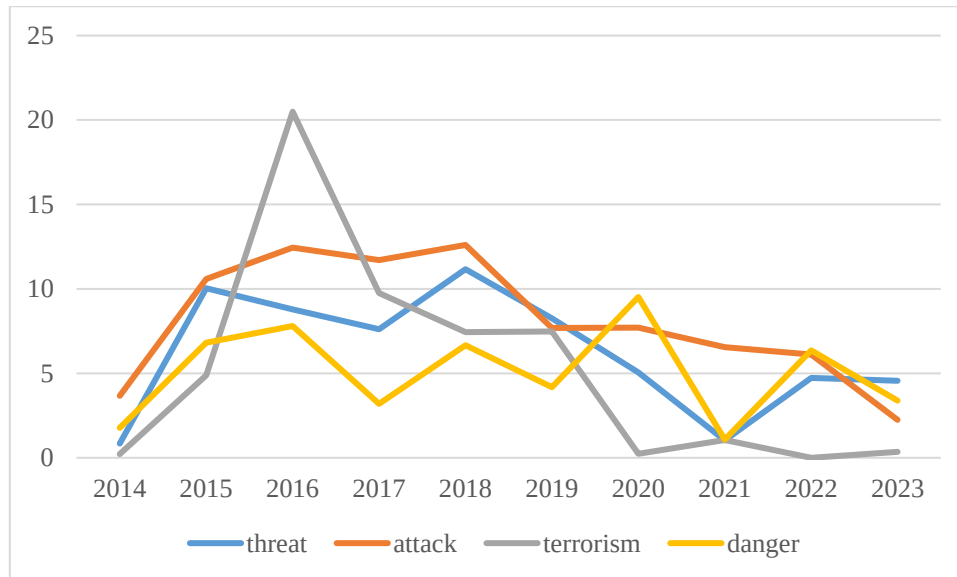


The terms ‘Hungary’ and ‘Hungarian’ were among those the most frequently used within the prime ministerial speeches. The study of the weighted annual occurrences of those was therefore essential. Figure 6 shows the results over time while also showcasing the temporal change in the use of the terms ‘migration’ and ‘migrant’.

Usage of the keywords ‘Hungary’ and ‘Hungarian’ were well-aligned; the increase started in 2014, the weighted annual frequencies were 208, 222, 330, 378 and 368 for ‘Hungarian’ and 170, 190, 215, 287 and 333 for ‘Hungary’ between 2014 and 2018, respectively. Use of the word ‘Hungarian’ peaked in 2017 and of ‘Hungary’ in 2018. Viktor Orbán used these terms less frequently in the following year (2019), as the weighted annual occurrence for ‘Hungarian’ was 287 and for ‘Hungary’ 261. The decline started in 2018 and ended in 2021: the observed measures were 100 for ‘Hungarian’ and 93 for ‘Hungary’. The weighted annual occurrence of the word ‘Hungarian’ was almost always higher than for ‘Hungary’, with one exception: 2022, the year of a critical national election, which proved surprisingly successful for Viktor Orbán’s government. In 2022, the calculated measures were 163 and 137 in favour of ‘Hungary’. Year 2023 was observed to be similar to 2021, considering the computations of weighted annual occurrences. Although the volume of the keyword pairs ‘Hungary’ – ‘Hungarian’ and ‘migration’ – ‘migrant’ was not comparable, over time we observed synchronicity in changes in the weighted annual frequencies.

Several other keywords were associated with the topic of migration in the Prime Minister's speeches. The study of the weighted annual frequencies of words like 'threat', 'attack', 'terrorism', 'terrorist', 'danger', 'dangerous', 'violence' and 'violent' may also contribute to the understanding of the political communication strategies of Viktor Orbán. Therefore, we also examined some of them and completed our analysis with the results. In Figure 7, the weighted annual frequency of selected terms ('threat', 'attack', 'terrorism', 'danger') is displayed.

Figure 7. Weighted annual occurrence of the words 'threat', 'attack', 'terrorism' and 'danger'



In the examined 10-year period, the word 'threat' appeared first in 2014, although the weighted annual frequency was low (1 in 2015); it then increased to 10, then slightly decreased to 9 and 8 in 2016–2017. In 2018, it reached its maximum, 11 and then declined until 2021 (between 2019 and 2021, 8, 5 and 1, respectively). In 2022 and 2023, the annual weighted frequency stagnated at 5. The verb 'attack' started with a relatively low weighted occurrence in 2014, then rose to 11, 12, 12 and 13 between 2015 and 2018. From 2019 to 2023 it declined (8, 8, 7, 6 and 2). The word 'terrorism' appeared for the first time in 2015 when its weighted frequency was 5; by 2016, its use had increased drastically to 20. Following that peak in 2016, it dropped to 10, 7 and 7 between 2017 and 2019, after which it was used significantly less.

Discussion and conclusions

We analysed the speeches made by Hungarian Prime Minister Viktor Orbán from the beginning of 2014 to the end of 2023 (a total of 1,421 individual speeches) that were available online at miniszterelnok.hu/en and its archive page(s).

To build the theoretical framework, we examined the development of immigration and xenophobia in Hungary (see, for example, Barna and Koltai 2019; Sik 2016a), the evolution of immigration policy under the Orbán government and previous analyses of the communications of the Prime Minister and the governing party on the issue of immigration (see Benczes and Ságvári 2022; Glied and Pap 2017; Sata 2020). Based on the theoretical framework defined for the research, we conducted a quantitative

analysis using descriptive text analytical tools after applying pre-established pre-processing steps for natural language processing. The analysis was based on words that have featured prominently in previous research on migration, as well as in government policy communications and the migration narrative associated with Billboard Campaigns.

The research question addressed how the occurrence of keywords relevant to migration changed in Viktor Orbán's speeches during the 10-year period between 2014 and 2024. In other words, what dynamics were observed in the use of words related to the topic? We used statistical tools to compare the relative frequencies of keywords. We also computed weighted annual occurrences of key terms to compare them over time in order to investigate possible differences in political communication strategies.

The results of the analysis confirm the conclusions of previous studies summarised in the Theoretical overview. In 2015, Viktor Orbán used the term 'immigration' relatively often in his speeches but, from then on, the use of the term 'migration' started to increase and, in the following years, exceeded the former and reached its maximum in 2018, along with 'immigration', which was less dominant in terms of usage but still peaked that year. A similar trend was observed from an examination of the words 'refugee', 'immigrant' and 'migrant': use of the term 'migrant' gained strength after 2015 and, while the mentions of the other 2 terms decreased, 'migrant' continued to be more frequently used than the other 2 combined. Other researchers have also found that the use of the word 'migrant' in political communication is a conscious choice intended to alienate the group and develop negative connotations (Benczes and Ságvári 2022). The mention of 'Brussels' and 'Soros' also spectacularly increased in speeches after 2015, which suggests that Viktor Orbán's speeches were a traceable expression of the government's communications, which were critical of Brussels and George Soros. Analysis of key terms like 'threat', 'attack', 'terrorism' and 'danger' confirmed the hypothesis –supported by the literature we have presented – that, over time, the negative image of immigrants in Viktor Orbán's speeches became reinforced in line with the government's anti-migrant narrative. It can also be argued that he included in his speeches the same themes and keywords that were raised in the government's Billboard Campaigns.

This work contributes to previous research that has analysed Viktor Orbán's speeches from the perspective of migration – much of it more qualitatively focused – and complements it with a quantitative text analysis of all Orbán's English-language speeches delivered between 1 January 2014 and 31 December 2023 that are available online. While grounded in existing analyses focused on Hungary, this study makes a distinct contribution through its use of a large, original dataset of Viktor Orbán's English-language speeches and the application of quantitative text analysis. To our knowledge, this is the first study to apply this methodology in this context, thereby offering fresh insights into the international dimension of Hungarian political communication.

Notes

1. Note that National Consultations in Hungary are government-initiated survey questionnaires sent by mail to all Hungarian citizens with a registered address. These surveys typically ask for opinions on politically sensitive topics – such as immigration, EU relations or economic policy – and are framed in a way that reflects the government's stance. While presented as tools for public input, they are widely criticised for being biased, leading and used more as instruments of political mobilisation and legitimisation than genuine democratic consultation.

2. The Quota Referendum in Hungary, held on 2 October 2016, was a national vote organised by the Hungarian government to oppose the European Union's plan to redistribute asylum-seekers among member states through mandatory quotas.
3. Full list of keywords selected and used for the analysis: adversary; attack; Brussels; Catholic; culture; danger; dangerous; enemy; faith; homeland; Hungarian; Hungary; immigrant; immigration; migrant; migration; Muslim; refugee; religion; religious; rival; Soros; terrorism; terrorist; threat; tradition; violence; violent.
4. The phrase 'millennial cultural dominance' as used by Tölgyessy (2014: 643) refers to the long-standing, historically rooted influence of a particular cultural or ideological framework that has shaped a society – specifically Hungary – for many centuries (i.e., over a 'millennium').
5. 'The people have decided: the country must be defended' – Viktor Orbán's speech before the agenda in Parliament on 21 September 2015.
6. 'Don't let Soros have the last laugh' – government Billboard Campaign, 2017.
7. Quotes from the government Billboard Campaign.
8. 'Let's send a message to Brussels so they understand' – billboards in 2016.
9. Billboards starting with 'Did you know?'. For example, 'Did you know? Since the beginning of the immigration crisis, the number of incidences of harassment against women in Europe has skyrocketed'; 'Did you know? More than 300 people have died in terrorist attacks in Europe since the beginning of the immigration crisis'.
10. Billboard Campaigns in Hungary refer to large-scale, state-funded public messaging efforts primarily conducted through posters and billboards placed across the country. These campaigns have been a central communication tool of the Orbán government – especially since the 2015 migration crisis – and are typically tied to politically charged themes.
11. 'If we don't protect our borders, tens of millions of people will come to Europe again and again', the Prime Minister said on Kossuth Radio's 180 Minutes programme on Friday. The Prime Minister said that there is a serious difference of opinion between the EU and Hungary, because most EU leaders believe that everyone should be allowed in but, if we let everyone in, Europe will be finished' (<https://hirado.hu/2015/09/04/hallgassa-itt-eloben-a-miniszterelnoki-interjut/#>, accessed 4 September 2025).

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— SPECIAL SECTION THREE —

Making the Temporary Permanent? Approaches to International Protection in the European Union, Türkiye and the United States

Alan Desmond*, Talia Inlender**, Kamila Kowalska***

The question of temporary protection has risen in prominence and generated a growing body of scholarship since the Russian invasion of Ukraine in 2022 and the resulting activation of the EU's long-dormant Temporary Protection Directive for the benefit of persons forced to flee Ukraine. In this special section we examine the practical implementation of temporary protection in Poland, a key host EU member state for Ukrainians. We also widen the scholarly inquiry into temporary protection beyond the EU to examine the approach of other important destination states, namely, Türkiye and the United States. The contributions to this special section illustrate a number of key features of temporary protection, including that it is neither a new response to forced migration, nor confined to the Global North. They also make clear that the increasing recourse to temporary protection for persons seeking refuge outside their countries of origin entails not only fixed-term protection statuses but also, often, an accompanying suite of rights that falls short of that traditionally associated with refugee status. While highlighting some key disadvantages endured by temporary protection beneficiaries, such as precarity and uncertainty, the contributions also identify the benefits of such protection, both for host states and some beneficiaries. Collectively, the contributions to this special section sketch the pitfalls that must be avoided if the increasingly widespread recourse to temporary protection is to unfold in a manner that benefits not only host states but also those in need of those states' protection.

Keywords: international protection, Temporary Protection Directive, Refugee Convention, non-refoulement, voluntary

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The concept of temporary protection for persons facing serious harm in their country of origin quickly gained currency in public discourse in Europe following the Russian invasion of Ukraine on 24 February 2022. With lightning speed, the Council of the European Union adopted a Decision¹ that implemented, for the first time, the EU's 2001 Temporary Protection Directive (TPD).² The robust catalogue of rights conferred on beneficiaries by the TPD – and its activation less than two weeks following the Russian invasion – led some to query the preferential, generous protection approach taken by the EU to Ukrainians compared to that taken with persons fleeing conflicts in countries such as Syria, Afghanistan and Tunisia, whose mass displacement had not catalysed the European Union (EU) to implement the TPD (e.g., İneli-Ciğer 2022, 2023). Despite the perception of 'generosity' that may accompany the EU's extension of temporary protection to persons fleeing the Russian invasion of Ukraine, the contributions to this special section make clear that EU recourse to temporary protection for Ukrainians is symptomatic of a much wider turn to temporary protection for persons seeking refuge outside their countries of origin. This wider turn entails not only fixed-term protection statuses but also, often, an accompanying suite of rights that falls short of that traditionally associated with refugee status. Indeed, the temporary turn extends to refugee status itself. The starkest illustration of the latter is the recent proposal in the UK to increase from 5 years to 20 years the length of time that persons granted refugee status would have to wait before becoming eligible for permanent residence. Every 2.5 years during this 20-year period, refugees would be subject to a review to ascertain their ongoing protection need, in the absence of which they would be removed.³

The turn to temporary protection has already generated an important and fast-growing body of scholarship. An invaluable special issue of the *Journal of Ethnic and Migration Studies* in 2025 explores practices in Denmark and Norway adopted to withdraw or deny the extension of refugees' residence permits in those countries (Sandberg, Schultz and Syppli Kohl 2025), while recent scholarship indicates that the trend in Europe to make temporariness a staple of international protection is unlikely to encounter insurmountable resistance from supranational human rights monitoring bodies (Schultz and Vedsted-Hansen 2025). One of the values of our own special section, however, is that it makes clear that the turn to temporary protection is far from being a European trend. While the first article, by Kindler and Tygielski (2025, in this section), explores the implementation of temporary protection in Poland in response to the relatively sudden large-scale arrival of Ukrainians, the following two articles explore the extensive recourse to temporary protection in Türkiye. The final article, by Talia Inlender, highlights the centrality of precarious, short-term protection status in the international protection landscape in the United States.

The turn to temporary protection may be understood as an addition to the deterrence toolbox of the Global North. Recent decades have seen states in the Global North develop strategies to discourage the arrival on their shores of individuals seeking refuge and to prevent access to international protection procedures (Gammeltoft-Hansen and Feith Tan 2017; Hathaway and Gammeltoft-Hansen 2015). Containment in transit countries and pushbacks and pullbacks from destination countries are key tactics in this deterrence paradigm. The contributions to this special section focus on what might be termed a 'next generation' of legal measures deployed against individuals whose legitimate claim to international protection has been formally recognised by the host state. They illustrate the measures that states adopt to make immigration status more temporary and less protective for asylum-seekers whose arrival those states have been unable or unwilling to prevent and whose claims for protection they have been unable to deny.

At the same time, however, the articles in this special section make clear that neither temporary protection nor the temporary character of international protection, are new. International protection

has always contained within itself a mutability that may be unlocked where host states so desire. In ‘The Temporality and Stratification of Refugee Governance in Turkey: An Analysis for Temporary and International Protection from Reception to Return’, Ela Gökalp Aras (2025, in this section) locates the temporariness inherent to international protection in the cessation clauses of the Refugee Convention which empower states to transform protection into return once they legally recognise a change in conditions in refugees’ origin countries. Similarly, in her paper, ‘Temporary Protection in the Shadow of the Refugee Convention: A View from the United States’, Talia Inlender (2025, in this section) observes that forms of temporary protection have been a feature of the US legal framework for over 70 years. The turn to temporary protection may therefore be better understood as a centring and intensification of the temporary qualities of international protection, an approach adopted by states in response to migration flows perceived to be too large to be acceptable to host-state populations.

While temporary protection sits alongside refugee status and subsidiary or complementary protection as a form of international protection, some of the contributors to this special section treat temporary protection as a stand-alone, *sui generis* form of protection, which is justifiable given the key distinction of temporary protection status – its non-durable nature. As is evident from the contributions to this special section, one of the consequences of the temporary turn in asylum is the narrowing of access to the durable solutions with which international protection is concerned. Durable solutions are supplanted by sustained precarity under temporary protection – sometimes extended and prolonged over many years – and *de facto* involuntary return. While the articles in the special section vary in their geographical focus and/or methodological approaches, they converge on this central point of the decline of durable solutions. They also, however, identify potential advantages of temporary protection for both host states and protection beneficiaries. They further attest to the fact that, as the following article summaries show, scholarly analysis and engagement can play a role in bringing attention not only to the perils of moving away from durable solutions but also to the pitfalls that must be avoided if the increasingly widespread recourse to temporary protection is to unfold in a manner that benefits not only host states but also those in need of those states’ protection.

The contributions

In their contribution, ‘How “Special” is the Special Law? Temporary Protection and Migration Infrastructure in Poland Following the Outbreak of the Full-Scale War in Ukraine’, **Kindler and Tygielski** (2025, in this section) adopt a critical approach to migration infrastructure to examine Poland’s response to the large-scale arrival of forced migrants following the Russian invasion of Ukraine, with which Poland shares a 535 km border. The sudden mass inflow of people from Ukraine catalysed Poland to adopt the Act of 12 March 2022 on Assistance to Citizens of Ukraine in connection with the Armed Conflict on the Territory of the Country, referred to as the Special Law. The authors analyse the impact of this law not only on those it protected but also on the migration-infrastructure actors such as central and local government, civil society, migration lawyers and employee and employer organisations, by drawing on data from 43 semi-structured qualitative interviews with Ukrainian forced migrants and migration-infrastructure actors conducted between March and October 2023 in Poland. The authors carry out a multi-dimensional analysis that reveals that the Special Law facilitated the work of migration-infrastructure actors in the ‘humanitarian dimension’ by, for example, simplifying processes of entry and residence and access to the labour market, thereby allowing those actors to devote more time to finding work for the Ukrainian arrivals. Analysis of the ‘social dimension’ of the migration infrastructure – namely, the social networks of migrants – reveals the key role played by

Ukrainians themselves in explaining and circulating information about the protective content of the Special Law and how to access it. Indeed, the information disseminated *by* Ukrainians *to* Ukrainians offset the shortcomings revealed by the authors' analysis of the 'technological dimension' of the migration infrastructure. These shortcomings include low levels of database inter-operability between central and regional government and deficient online application processes for residence cards, which meant that Ukrainians had to present themselves in person at government offices to have their fingerprints taken. At the same time, however, the 'technological dimension' was aided by the Special Law's introduction of a number of innovations such as an ICT system facilitating contact between Ukrainian citizens and employers.

Kindler and Tygielski highlight that Poland's Special Law diverged in important ways from the EU's TPD. Chief among these ways was the limitation of the personal scope of the Special Law to Ukrainian citizens. By contrast, the implementation Decision of 4 March 2022 provided that the protection of the TPD would be available not only to Ukrainian citizens who had been residing in Ukraine since before 24 February 2022 but also to stateless persons or non-Ukrainian citizens who held refugee status or another form of protection in Ukraine before 24 February, as well as family members where 'the family was already present and residing in Ukraine before 24 February'. A further area in which the Special Law was more restrictive than the TPD related to accommodation. While the former obliges the state to provide suitable accommodation for beneficiaries of temporary protection, the Special Law was amended in 2023 to require Ukrainians to pay for the collective accommodation facilities provided by the state. As the TPD operates in parallel to – and distinct from – the Special Law, there were situations where it served to fill in protection gaps created by the Special Law. For example, while the Special Law required that Ukrainians' entry into Poland after the Russian invasion had to be recorded by the Border Guard, the TPD did not formulate formal requirements on how a person fleeing war should cross the border and therefore facilitated the legalisation of individuals who had entered illegally in contravention of the requirements of the Special Law.

Kindler and Tygielski's analysis of the Special Law is placed within the wider context of Ukrainian labour migration to Poland. Prior to 24 February 2022, Poland was already host to a substantial population of Ukrainian migrant workers, many of whom engaged in the circular migration facilitated by geographical proximity and the demand for seasonal labour in Poland. The authors note that the characteristics of the post-2022 invasion population differed from those of previous years, with the former being predominantly made up of children, women and the elderly – but they also observe some striking convergences between labour and forced migration. They note that forced migrants continue to maintain transnational connections, mirroring established labour-migration patterns by crossing borders to check on family members who remain in Ukraine, thus underscoring the persistent need for familial and social connectivity despite displacement. They also make the observation that, until recently, the state-defined temporariness of legal statuses was mainly characteristic of labour migration. Persons benefiting from the Special Law and the TPD are therefore, in many respects, more advantaged than migrant workers: the former may bring or be joined by their families, may have fewer restrictions on their access to the labour market and may benefit from a catalogue of state support not provided to migrant workers. Kindler and Tygielski's contribution brings into sharp relief, however, the profound precarity that pervades Ukrainians' temporary presence in Poland. The sense of insecurity is exacerbated in the Polish context by frequent amendments to the Special Law, creating challenges for all migration infrastructure actors. On one view, of course, it is this very mutability and instability that the temporary turn in international protection seeks to foster. It gives rise to the question reasonably

posed by Kindler and Tygielski at the close of their contribution as to whether we are witnessing the emergence of a new normative framework for migrant protection.

In her paper, 'Revisiting the Concept of Flexibility in Temporary Protection Practices at the Intersection of International Refugee and Human-Rights Laws: The Case of Türkiye', **Neva Övünç Öztürk** (2025, in this section) focuses on the intersection of international refugee law and human rights law in the Turkish context to critically re-evaluate the concept of flexibility in temporary protection from a legal perspective. The value of a focus on Türkiye lies in the fact that the country has implemented temporary protection informally since 2012 – and formally since the adoption of the Law on Foreigners and International Protection (LFIP) in 2014. It is, therefore, along with the regime inaugurated in the EU in March 2022, the most significant contemporary practice of temporary protection. It is notable that the legal framework for temporary protection – established in Article 91 of the LFIP and operationalised through the Temporary Protection Regulation (TPR) – is origin-country neutral, a sharp distinction from the geographical limitation that Türkiye applies to the 1951 Refugee Convention, which makes Convention protection available only to persons from Europe.

The author explores whether flexibility, generally seen as a central advantage of temporary protection, may in fact militate against key principles of the international protection and human rights framework such as access to durable solutions and legal safeguards on the limitation of fundamental rights. Övünç Öztürk's (2025, in this section) argument is underpinned by the analysis of two dimensions of (excessive) flexibility, namely, rule-making and implementation. The focus on these dual dimensions highlights how broad discretion may, when exercised without adequate legal safeguards to ensure legal certainty and consistency with the rule of law, limit fundamental rights and create a legal limbo for displaced individuals. The analysis demonstrates that these challenges are exacerbated by the lack of effective international responsibility-sharing mechanisms and the reliance on temporary protection measures.

When it comes to flexibility in rule-making, Övünç Öztürk describes how both Article 91 LFIP and the TPR, which is the main source governing temporary protection in Turkish law, confer broad discretionary powers on the administrative authorities. This means that the authorities enjoy discretion when it comes to the measures to be taken for the reception and prevention of a mass influx; the rights, obligations, stay and exit of persons within the scope of the influx; cooperation and coordination between (inter)national institutions; and the determination of the duties and powers of central and provincial institutions. The author identifies two key implications of this flexibility in the state's authority to design the rules governing temporary protection. First, persons under temporary protection in Türkiye are ineligible to apply for international protection and, given that there is no upper time limit to temporary protection, such persons may remain in a temporary protection limbo until such time as discretion is exercised to terminate that protection if conditions in the origin country permit. With the door closed on the durable solutions inherent in international protection, beneficiaries of temporary protection in Türkiye are effectively left in a sustained state of uncertainty that ultimately erodes the exceptional and transitional character of temporary protection. Making this latter indefinite also raises broader concerns about the role of such protection in situations of protracted displacement. Second, the TPR provides excessive flexibility for the authorities to determine the access to and limitations of fundamental rights such as liberty (freedom from detention) and freedom of movement. The author raises the plausible prospect that the flexibility enjoyed by the authorities in making rules on temporary protection infringes both the Turkish constitution and international human-rights standards.

When it comes to flexibility in the application of rules, Övünç Öztürk identifies Turkish practice around voluntary return and restrictions on freedom of movement and residence to illustrate the adverse consequences of wide discretion in the practical application of rules. Voluntary return is effectively promoted as the only feasible, durable solution for those under temporary protection, in order to reduce administrative burdens and manage migration more efficiently. Some return processes are carried out without providing the affected individuals with the necessary legal safeguards, thus raising concerns about the risk of *refoulement*. Similarly, the requirement that beneficiaries of temporary protection are obliged to obtain a travel permit in order to leave their designated province of residence, without any explicit legal basis in either the TPR or the LFIP, conflicts with international human-rights norms and domestic constitutional standards on freedom of movement. The author explains this excessive flexibility as an outcome of a lack of international responsibility-sharing which produces a demand for migration control that is facilitated by a flexibility that valorises administrative convenience and efficiency over legal accountability.

Övünç Öztürk ultimately identifies temporary protection as a response to the practical gap arising from the absence of a binding, enforceable system for the fair and effective sharing of responsibility for international protection. In the absence of effective responsibility-sharing mechanisms, temporary protection offers a pragmatic and interim solution which emphasises flexibility as a way in which to ease the pressures on states. Temporary protection may, however, undermine the very system of international protection which it may be viewed as buttressing, replacing durable solutions with *de facto* involuntary return – and prolonged precarity and rights restrictions for persons under temporary protection. The EU's *de facto* endorsement of Türkiye as a safe third country legitimises the excessive flexibility that characterises the country's temporary protection regime, marking a troubling shift in the approach to protection, where adherence to international law is increasingly compromised in favour of pragmatic considerations.

While concerned with the dangers of excessive flexibility, the author does not call for the restriction of state discretion in the context of temporary protection. States that perceive their capacity for responsive action as unduly constrained may resort to other, more deleterious, deterrence policies or border closures, thereby undermining the protective aims of the international refugee regime itself. Instead, a calibrated balance between flexibility and legal accountability is essential in order to sustain the functionality of the regime and to preserve states' willingness to cooperate within it. Careful supervision is required in order to ensure that flexibility is operated in a way that is compatible with the principles and spirit of international protection and human-rights standards. In the absence of a standardised and binding international framework, however, states retain significant discretion in how they implement temporary protection measures.

The contribution of **Ela Gökalp Aras** (2025, in this section) also focuses on temporary and international protection in Türkiye. In 'The Temporality and Stratification of Refugee Governance in Turkey: An Analysis for Temporary and International Protection from Reception to Return' she identifies the situation of Syrians under temporary protection in Türkiye as a paradigmatic case of how modern states balance humanitarian commitments with national interests, with the government's open-door policy at the initial stage of large-scale Syrian arrivals evolving into a more regulated, securitised approach, reflecting the complex interplay between domestic politics, regional stability and international obligations. The author's central research question concerns how the mechanisms of temporality and stratification interact to produce and sustain what the author terms a condition of 'governable precarity' that enables the Turkish state to shift flexibly from humanitarian reception to return-oriented policies.

She begins her discussion of temporality by noting its origins, in the context of international protection, in the cessation clauses of the Refugee Convention which institutionalised temporality as a governance tool, thus enabling states to transform protection into return once they legally recognise a change in conditions. As noted by scholars like Alice Edwards (2012), temporary protection regimes operate through the same logic, enabling states to fulfil humanitarian duties while retaining sovereignty over time. This strategic temporal mechanism is domesticated in Article 11 of Türkiye's TPR. In an observation that chimes concordantly with the conclusions proposed by Övünç Öztürk, Gökalp Aras observes that extended temporariness facilitates both humanitarian legitimacy and political flexibility, sustaining governance frameworks that naturally evolve towards repatriation. Temporality in law and policy thus creates the conditions for return to appear legitimate, timely and orderly. The author employs the concept of 'strategic temporality' to capture the intentional use of temporality by state actors to manage, control and ultimately shape the experiences of protection beneficiaries – and identifies this as a central framework for understanding the Turkish response to the Syrian refugee crisis. The strategy is characterised by uncertainty, liminality and complexity, which collectively shape the experiences of refugees and the responses of the various actors involved. Within the legal framework, strategic temporality is implemented through temporary protection statuses, which grant limited rights while maintaining legal precarity. The legal precarity experienced by protection beneficiaries serves as a key component of this governance strategy, ensuring control over their movements and rights.

If temporality normalises the expectation of return, stratification defines who can be returned, when and under what conditions. Legal stratification refers to the creation of hierarchical legal statuses that determine access to rights, services and opportunities. This selective differentiation not only limits beneficiaries' ability to achieve stability but also reinforces their temporality, making it clear that their stay is conditional and subject to change. Legal stratification allows control to be maintained over the refugee population, ensuring that their presence remains manageable and adaptable to the state's shifting priorities. It allows the state to exercise power over the refugee experience, dictating the terms of access to rights and services while keeping the possibility of return open. Within Turkish law, legal stratification is formally embedded in the LFIP and related secondary legislation. Articles 61–63 establish three distinct forms of international protection in addition to the temporary protection codified in Article 91. These layered statuses carry differentiated rights, residence entitlements and access to legal remedies, thereby constructing a legally sanctioned hierarchy of protection. The TPR further codifies this inequality by granting only limited social and economic rights (health, education, work permits) while excluding permanent residence, family reunification or citizenship pathways and permitting the termination of status when 'the situation necessitating it ceases to exist'. Furthermore, a 2016 Regulation restricts labour-market access for temporary protection beneficiaries, deepening legal inequality between such beneficiaries and persons with (other forms of) international protection. This architecture, combining the legal differentiation of protection beneficiaries with temporality, illustrates how temporality and legal stratification interact not just as mechanisms to manage protected persons within Türkiye but also to make the process of return more feasible and justifiable. The temporality embedded in the legal framework helps to normalise the idea of return as an inevitable outcome, while legal stratification ensures that protection beneficiaries remain in a vulnerable position, more willing to accept return as a viable option.

In her paper, 'Temporary Protection in the Shadow of the Refugee Convention: A View from the United States', **Talia Inlender** (2025, in this section) illustrates the implications of the temporary turn in the US through an examination of four country-specific, time-limited humanitarian parole programmes operated by the US government between August 2021 and January 2025 for people from

Afghanistan, Ukraine and Venezuela and Cuba, Haiti and Nicaragua. While forms of temporary protection have been a feature of the US legal framework for over 70 years, Inlender notes that the country has never extended protection to as many people through humanitarian parole programmes in such a short period of time as it did during the Biden administration between summer 2021 and January 2025. She explains this increasing recourse to temporary protection by reference to the attenuation of the US asylum system that began in the 1990s and accelerated during the first Trump administration. The latter saw the introduction of drastic measures that severely curtailed access to the US asylum system. The end result is that the durable protections afforded by the Refugee Convention and incorporated into US law by the Refugee Act of 1980 are now inaccessible to many people seeking safety in the US. The ascent of temporary protection and the corresponding decline of durable refugee status in the US is clear from the numbers: while humanitarian parole was used to extend temporary protection to hundreds of thousands of migrants between August 2021 and January 2025, just a small fraction of that number was granted refugee or asylee status during that period.

Following her richly detailed examination of the four humanitarian parole programmes operated by the US between 2021 and 2025, Inlender draws on them to propose a framework for evaluating temporary protection mechanisms, with the proviso that temporary protection cannot serve as a substitute for access to the more durable protections offered by the Refugee Convention. It is, however, the *de facto* denial of Refugee Convention protection to so many international protection claimants that lends a particular urgency to the elaboration of an evaluative framework for temporary protection.

Inlender identifies three components of the US humanitarian parole programmes that illustrate the benefit of temporary protection, both for those in need of protection and for their host states. The first component is the speed with which temporary protection measures allow the state to respond to the immediate protection needs of large numbers of people, often also providing immediate access to the labour market. By contrast, applicants for Refugee Convention protection often endure a wait of many years before the definitive determination of their refugee status or the realisation of the decision to resettle them. Secondly, the simplicity of humanitarian parole applications allows for them to be completed without intensive legal assistance, again a striking contrast to asylum applications. While the relative simplicity of the application process advantages persons in need of protection, it also helps states to better meet their obligations to afford protection to those in need. The third beneficial component of temporary protection programmes is what Inlender characterises as ‘grounding’. This means that they create an opportunity for forced migrants to develop attachments in a safe country that may lead to longer-term protection.

Inlender’s examination of the US humanitarian parole programmes also discloses some serious potential limitations. First, she notes the subjectivity of such programmes. This refers to the fact that they may effectively discriminate on the basis of nationality, conferring protection only on persons from a designated country. The subjectivity extends, however, to implementation, with the criteria, scope and content of temporary protection programmes varying from programme to programme, resulting in divergent treatment by country. Second, temporary protection programmes are ‘solitary’, meaning that they are detached from international norms and accountability, which creates space for unequal treatment for different groups of temporary protection beneficiaries. Finally, Inlender discusses the instability of temporary protection programmes which is inherent in their very nature; their time-limited design puts beneficiaries in a state of prolonged precarity and sustained uncertainty; their mutability militates against the very ‘grounding’ that they may facilitate. Indeed, the inherent instability of such programmes is starkly illustrated by President Trump’s termination of humanitarian parole and other temporary protection programmes upon assuming office in January 2025.

Inlender concludes with a more detailed, albeit brief, sketch of a temporary protection programme that maximises speed, simplicity and grounding while minimising subjectivity, solitariness and instability. In so doing, she outlines a framework for protection that will be of interest to anyone concerned with the specifics of temporary protection and the rapidly shifting international protection landscape more broadly.

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Notes

1. Council Implementing Decision (EU) 2022/382 of 4 March 2022 establishing the existence of a mass influx of displaced persons from Ukraine within the meaning of Article 5 of Directive 2001/55/EC and having the effect of introducing temporary protection [2022] OJ L 71.
2. Council Directive 2001/55/EC of 20 July 2001 on the minimum standards for giving temporary protection in the event of a mass influx of displaced persons and on measures promoting a balance of efforts between Member States in receiving such persons and bearing the consequences thereof [2001] OJ L 212.
3. Home Office, *Restoring Order and Control: A Statement on the Government's Asylum and Returns Policy*, 21 November 2025. <https://www.gov.uk/government/publications/asylum-and-return-s-policy-statement/restoring-order-and-control-a-statement-on-the-governments-asylum-and-returns-policy> (accessed 16 December 2025).

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How ‘Special’ is the Special Law? Temporary Protection and Migration Infrastructure in Poland Following the Outbreak of the Full-Scale War in Ukraine

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This article analyses how actors involved in migration infrastructure in Poland responded to the introduction of the Act of 12 March 2022 on Assistance to Citizens of Ukraine in Connection with the Armed Conflict on the Territory of the Country (referred to as the ‘Special Law’) and how Ukrainian migrants themselves interpreted its implications. Although this Act established new legal protection for forced migrants, its application revealed significant limitations, including ambiguous enforcement mechanisms. This resulted in operational uncertainty for implementing organisations. Organisations with existing connections to migration infrastructure and past refugee assistance experience were able to quickly understand the new requirements by using established networks. Meanwhile, migrant organisations and social-media platforms emerged as the most effective channels for communicating essential information to forced migrants.

Keywords: forced migration, migration infrastructure, Poland, Special Law, temporary protection status, Ukraine

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Introduction

Drawing on refugee and labour-migration studies, this article analyses the response of migration infrastructure actors to the introduction of a new law in Poland, the *Act of 12 March 2022 on Assistance to Citizens of Ukraine in connection with the Armed Conflict on the Territory of the Country*¹ (referred to as the ‘Special Law’) and the reflections of Ukrainian migrants on this legal and infrastructural context. The analysis considers the experience of both those migrants who fled to Poland after the war broke out and were directly covered by this act, as well as those who were caught by the war during their labour migration. By migration infrastructure, we understand ‘institutions, networks and people that move migrants from one point to another’ (Lindquist, Xiang and Yeoh 2012: 8–9), attempting to facilitate the process through ‘infrastructuralisation’ but facing the risk that the interplay between different dimensions of migration infrastructure ends up constraining people’s migratory prospects. In this article, we use the term ‘Special Law’ (in Polish *specustawa*), a term from legal jargon that has been adopted in the media, public discourse and politics. The Special Law (like other laws referred to in this way) is, in terms of procedure for its enactment or amendment, an ordinary law (see, for example, Zaliwski 2018). However, the act’s popular name captures the fact that it was designed in response to an emergency – the outbreak of the full-scale war in Ukraine – and offers an alternative and unprecedented path to people seeking refuge in Poland. As we further argue in this article, the act has distinctive qualities compared to the Temporary Protection Directive.

With the full-scale invasion of Ukraine by Russia on 24 February 2022, the Polish authorities were confronted with the need to respond to a situation without precedent in the region’s recent history. This was because the first, tangible consequence of the massive air and missile attacks targeting virtually all major Ukrainian cities and critical infrastructure was the mass flight of the civilian population, for obvious geographical reasons, towards Poland (Jaroszewicz, Grzymiski and Krępa 2022). From one day to another, Poland – which was a key destination for Ukrainian temporary workers – became one of the main destinations for forced migrants from Ukraine. Until February 2024, the war forced 6.5 million people to be internationally displaced (UNHCR 2024), constituting the fastest-growing displacement crisis since the Second World War. It was clear that the administration in Poland – the country having the longest border with Ukraine and with over 100,000 people already crossing it by 28 February 2024 – could not proceed quickly enough with applications for international protection. The Special Law was intended to enable the rapid provision of protection to over 1 million people, mainly women and children, by the end of March 2022 (Duszczuk and Kaczmarczyk 2022).

Although the Special Law did not have the word ‘protection’ in its name, this law was the basis for granting temporary protection. This was a surprising turn, that a quickly formulated act could practically equalise the temporary rights of those seeking refuge to those of Poles, in contrast to the increasing restrictiveness and even refusal to grant protection in previous years under the existing law² (Klaus, Lévy, Rzeplińska and Scheinost 2018; Narkowicz 2018; Pawlak 2022). The Special Law, although a state-specific act, was enacted almost simultaneously with and as a response to the unexpected activation of the Council Directive 2001/55/EC of 20 July 2001 on minimum standards for giving protection in the event of a mass influx of displaced persons and on measures promoting a balance of efforts between Member States in receiving such persons and bearing the consequences thereof (hereinafter, the Temporary Protection Directive or TPD)³ by the Council Implementing Decision 2022/382. As some authors have claimed, the Polish Special Law on temporary protection is not fully compatible with the corresponding EU law (Łysienia 2023). Such considerations are all the more justified given that, according to Art. 2(6) of the Special Law, ‘A citizen of Ukraine (covered by the

operation of the Special Law) is considered to be a person enjoying temporary protection in Poland within the meaning of Article 106(1) of the Act of 13 June 2003 on granting protection to foreigners within the territory of the Republic of Poland'. In contrast to the TPD, only Ukrainian nationals who had a legal right to stay on Polish territory from 24 February 2022 onwards due to the hostilities in Ukraine, were recognised as persons benefiting from temporary protection in line with the Special Law.⁴

This article examines how the Special Law, with its temporary solutions, may have affected the migration infrastructure supporting Ukrainian nationals seeking or already granted temporary protection. Our interest is piqued by the fact that, apart from the experience of a few administrative officials, NGOs and migrant organisations, many new institutions have been established. The majority of organisations had to reorient themselves towards assisting forced migrants and learn what this unique legislative context means in practice in a limited timeframe. Our focus is on the main provisions of the Special Law, how the migration infrastructure responded to them and the major amendment to the law in mid-2024. This provides readers with the most up-to-date picture possible of Polish legislation on temporary protection. This new legal framework gives Ukrainian nationals greater access to labour and social rights in Poland than to third-country nationals, who enter on temporary visas or employment schemes. Nevertheless, we consider how this new temporary status could lead to a liminal experience (Turner 1987), which could affect the social and economic situation of the people affected by it. The fundamental uncertainty of this temporary status of protection is visible in the renewals announced just a few months before the law is about to expire. We analyse the consequences of the Polish state introducing this new law for each dimension of the migration infrastructure.

Literature review and theoretical framework

With our article, we contribute to the body of literature analysing temporary migration policy schemes in general and forced migration in particular, focusing on the regulatory dimension of the migration infrastructure. We begin the literature review by presenting studies on labour migration concerning guestworker programmes and the (non)activation of temporary protection measures in Europe. We then move on to the most recent studies on the regulatory response to forced migration from Ukraine.

Until recently, the state-defined temporariness of legal statuses was mainly characteristic of labour migration (Cook-Martín 2024). There is continued enthusiasm for temporary migrant workers' programmes, also known as guestworker programmes, with policymakers claiming that this form of mobility results in 'triple-win' outcomes for migrants, as well as for destination and sending countries (Castles and Ozkul 2014; Constant, Nottmeyer and Zimmermann 2013; Vertovec 2007). However, critics view these programmes as part of a long-standing pattern dating back to the mid-19th century, where governments use temporary legal status as a tool to control foreign labour and discourage permanent immigration (Boucher and Gest 2015; Cook-Martín 2024; Parreñas and Silvey 2021). Programmes for temporary migrant workers, which offer few or no paths to integration, create disparities based on gender, ethnicity and social class. These schemes typically prevent workers from bringing their families, deny them opportunities for permanent residence and use their temporary status to maintain control over both migrant and local workers (Cook-Martín 2024; Hernández-León, Hernández and Paniagua 2022; Iskander 2021; Parreñas 2015). A partly similar (un)intended outcome may result from temporary protection schemes such as the TPD or the Special Law, which are designed to add those under protection temporarily to the society and labour market – a non-durable solution; they are admitted with the understanding that they will return to their country when the war ends. Although migrants under such schemes often arrive with their families and are given far greater access to rights

than migrant workers, they are kept in limbo, making the potential turn towards a more stable status unattractive and, as a result, rendering them vulnerable to labour exploitation (Burciaga and Malone 2021; Menjívar 2006; Menjívar, Agadjanian and Oh 2022).

Numerous studies have analysed why the European Union refused to activate the Temporary Protection Directive for more than 20 years (Beirens, Maas, Petronella and van der Velden 2016; Ineli-Ciğer 2016, 2018; Koo 2018). Following the activation of this Directive, scholars highlighted the double standards in comparing past refusals with current justifications for providing Ukrainian nationals with temporary protection under these measures (Carrera, Ciger, Vosyliute and Brumat 2022; Costello and Foster 2022; Ineli-Ciğer 2022). Researchers analysed why the Polish authorities decided to create a new temporary protection mechanism in a hurry, despite the existence of a protection act on foreigners (Andrejuk 2023; Jaroszewicz *et al.* 2022; Klaus *et al.* 2022). Although the initial justification was not only to facilitate the protection at a national level (Jaroszewicz *et al.* 2022) and offer a greater scope of protection than under the EU law (Grzelak-Bach 2022), scholars actually pointed out quite the opposite – it provided less protection in some areas, diverging from the minimum standards (Łysienia 2023). Researchers claim that, despite the amendments, neither the Special Law nor the Temporary Protection Directive are clear documents (Łysienia 2023). The majority of the research on the situation of forced migrants from Ukraine – in Europe in general or in Poland in particular – analyses social attitudes towards these people (Weisser 2023), local aid responses (Gaweł Mroczek-Dąbrowska, Marcinkowski and Kania 2024), the response of the welfare state (Necel 2025), the forced migrants' everyday experiences and their intentions to settle (Shelest-Szumilas and Wozniak 2024) or to return to Ukraine (van Tubergen, Wachter, Kosyakova and Kogan 2024). In this paper, we analyse the regulatory framework – i.e. the Special Law – and the various actors involved in migration infrastructure in this specific context.

This paper adopts the theoretical framework of a critical approach to migration infrastructure. According to the growing body of migration research, which adopted the 'infrastructural turn', the legal dimension is part of the migration infrastructure, framing the relationships among states, employers, workers, labour brokers and civil society (Düvell and Preiss 2022; Lubberhuizen 2024; Matuszczyk, Salamońska and Brzozowska 2022; Tazzioli 2024; Wessendorf and Gembus 2024; Xiang and Lindquist 2014). Xiang and Lindquist refer to the regulatory dimension of the migration infrastructure, which includes the state apparatus and various procedures, including rules governing entry, residence and employment access, as well as their enforcement mechanisms. Other dimensions include the commercial one (labour recruiters or intermediaries), technological (for example, transport and social media), humanitarian (non-governmental and non-profit organisations) and social (networks). Xiang and Lindquist (2018) take a more critical look at migration infrastructure with the concept of 'infrastructural involution', which suggests that the interplay between its different dimensions makes it a continuous and self-serving process, thus constraining rather than boosting people's migratory prospects. Despite the efforts of 'infrastructuralisation' to simplify migration processes, these latter have become more complex. This complexity often requires migrants to rely on new actors within the system, such as micro-influencers (Wanicka 2024). As Xiang and Lindquist write, this process 'makes migrants more protectable – for instance through comprehensive identity registration and by putting in place hearing systems to process migrants' complaints upon return – but not necessarily protected' (2018: 752). The term 'infrastructuralisation' allows a greater focus on the process: 'a set of indeterminate practices that unfold through unpredictable encounters among diverse and transregionally located actors, bureaucratic objects, and impractical procedures contingent on

institutional cultures and constant (mis)interpretation at varying degrees' (Shrestha and Yeoh 2018: 664–665).

The migration infrastructure framework was primarily employed for analysing labour migration with a focus on the commercial dimension, although there were a few exceptions (Matuszczyk and Kowalska 2024; Tazzioli 2024). According to this framework, the Special Law is part of the regulatory dimension of the infrastructure. Building on this body of literature, our article analyses the impact of this particular regulatory dimension on the commercial, technological, humanitarian and social aspects of migration infrastructure.

The context of migration between Ukraine and Poland: From labour to forced migration and from unregulated to regulated temporary movement

Following the dissolution of the Soviet Union in the 1990s, restrictions on international mobility were relaxed and Poland became an important destination for Ukrainian migrants. Regarding formal access to the labour market, until 2006, migrants without a permanent residence permit in Poland could work legally only after receiving a work permit, which was a costly and time-consuming procedure. A crucial step towards more liberal access to the labour market, which also covered Ukrainian nationals, was the introduction of a simplified procedure of employment on a short-term basis in agriculture, based on an employer's declaration, without an obligation to obtain a work permit for a foreigner and without the need for a labour-market test (Górny and Kaczmarczyk 2018; Szulecka 2016). From 2007, more sectors were covered by the legislation. What we have witnessed over time in Poland is a change from unregulated, informal migration based on social networks to more-formalised labour migration, following a rapid growth of private labour-market intermediaries (Fiałkowska and Matuszczyk 2021; Kindler and Szulecka 2022). However, migrant workers in Poland faced restricted access to welfare services, including employment support (Pawlak and Lashchuk 2020). They also had very limited possibilities for settlement, as the Act of 12 December 2013 on Foreigners,⁵ which provides regulations on granting and altering the temporary residence and work permits, requires the migrant to have a source of stable and regular income sufficient to cover his/her subsistence expenses and those of dependent family members and the obligation to have a place of residence. In 2014, with Russia's war on the Ukrainian provinces of Donbas and Luhansk and the annexation of Crimea, Poland began to see a change in the scale and character of the Ukrainian migrant population, with more families arriving and with migrants having more of a settlement outlook (Drbohlav and Jaroszewicz 2016; Górny and van der Zwan 2024). As in the 2010s, laws concerning settled migration were not liberalised in Poland; thus, the switch from a temporary to a longer-term perspective of stay was linked to the war context, with little to no hope for a quick improvement of the political and economic situation in Ukraine (Górny and van der Zwan 2024). Very few Ukrainian nationals received refugee status at that time (Jaroszewicz 2015; Szczepanik and Tylec 2016).

With the refugee status applications being rejected, most of those who arrived after 2014 for the first time turned to the entry routes used by labour migrants. Between late 2013 and early 2018, there was a dramatic surge in Ukrainian migration to Poland. By 1 January 2018, the total number of residence cardholders in Poland witnessed a fourfold increase from 2013 levels. However, these residence-card statistics only tell part of the story. The true scale of foreign labour migration to Poland is better illustrated by workplace documentation, with over 1.8 million employers' declarations issued of their intention to employ a foreigner, mainly for seasonal work (of which 94 per cent were for Ukrainian citizens) – a remarkable sevenfold increase in the number of work authorisation documents issued to

foreigners in Poland when comparing 2017 employment-related documents to 2013 figures (Górny and Kindler 2023). With the arrival of people fleeing Ukraine due to the full-scale war and the introduction of the Special Law, a new chapter was opened when it came to the access of Ukrainian nationals to Polish territory, social services and the labour market.

The characteristics of the fleeing population differed from those of previous years. The population was predominantly made up of children, women and the elderly. Many of the women had little or no experience of migration and originated mainly from the central, southern and eastern regions of Ukraine (Andrews, Isańskim Nowak, Sereda, Vacroux and Vakhitova 2023; Jarosz and Klaus 2023). Research findings on Ukrainian social networks in Poland show mixed results. A study found that over 40 per cent of Ukrainians who arrived after the full-scale war began had existing contacts with either Ukrainians or Poles in Poland (Andrews *et al.* 2023). However, a separate survey conducted in mid-2022 reported lower numbers: 33 per cent of respondents had family or relatives in Poland, while only 24 per cent had friends or acquaintances there (Jarosz and Klaus 2023). However, apart from the initial mobilisation of Poles to provide aid to those who fled, the role of the Ukrainian community in Poland was crucial, as was the Ukrainian ethnic minority. An important role was also played by social organisations that were active in the field before the outbreak of the war, together with ‘those that were established or reorganised after that date. The first group had years of experience working with migrants and migrant women, local communities, local and government institutions, international organizations, and sponsors’ (Jarosz and Klaus 2023: 56). Summing up, we are witnessing, in Poland, a continued development of migration infrastructure, with the inflow of more than 1 million people after February 2022 dynamically speeding up the process.

Methodology

Our analysis is based on data from the project ‘Accessing Migration Infrastructure and Employment Strategies in a Time of Crisis: Ukrainian Female War Refugees and Migrants in Poland and Italy’, financed by the National Agency for Academic Exchange (NAWA) Urgency Grants and approved by the Centre of Migration Research (CMR) Ethics Committee at the University of Warsaw. The methods included an analysis of documents and legal regulations (using the comparative method of legal research), with a focus on the Special Law in the context of the TPD, such as providing access to suitable accommodation, social assistance, aid in obtaining a livelihood, providing medical care and ensuring access to education for persons under the age of 18. The data collected during the project by a CMR-based research team between March and October 2023 in Poland consisted of 43 semi-structured qualitative interviews with Ukrainian forced migrants and migration-infrastructure actors. These 43 interviews included:

1. 13 interviews with migration-infrastructure actors, including 3 central and local administrators, 3 from civil society, 1 labour-union representative, 2 from legal offices specialising in migration, 2 intermediaries and employers’ associations and 1 migration expert. Of these infrastructural actors, only 2 have dealt in the past with issues related to refugee assistance. The interviewees were selected based on purposive sampling due to their functions and the visibility of their practice within the research field. All were active in cities. We were unable to reach any formal institutions from rural areas. The interview guide concerned the past and present involvement of migration-infrastructure actors in assistance to forced migrants, their opinion about the role of the different dimensions of migration infrastructure, as well as past and present challenges

- for migrants in the labour market and the differences between their experiences before and after the outbreak of the full-scale war;
2. 15 interviews with Ukrainian women working in the domestic sector in Warsaw and its vicinity (the majority of interviewees arrived for the first time in Poland after the full-scale war; 12 of these interviewees arrived with children); and
 3. 15 interviews with Ukrainian women working in the agricultural sector (the majority were labour migrants, 6 with children in Poland) in the Mazowieckie and Śląskie voivodeships. We included pre-2022 labour migrants, as many of them were covered by the Special Law (they returned to Ukraine, re-entered Poland and applied for the relevant documents) and they also gave us a benchmark on how the situation of migrants from Ukraine has changed due to the introduction of the new act.

Interviews with migrant women were selected based on snowball sampling techniques. After having received the consent of the research participants, all interviews were recorded, transcribed and anonymised. The interviews lasted from 1 to 2 hours. The interview guide concerned their legal status, including access to rights and services in the cases of those under Special Law protection, their labour migration experience and the role of migration infrastructure throughout their migration experience. The interviews were carried out in Ukrainian, Russian and Polish. We applied open coding, with new codes added during immersion into the research field, using the Atlas.ti programme. The different migration experiences of the interviewees in the 2 sectors – domestic work and agriculture – affected the data collected. Qualitative research material allows the identification of particular mechanisms – in this case of how both migration-infrastructure actors and forced-migrant women function within a new legal environment. Due to the period in which the research was conducted (March–October 2023), the interviewees did not have an opportunity to reflect on the continuous amendments of the law after October 2023.

The Special Law: Its functioning in the Polish legal order and in the experiences of practitioners and migrants

Rights offered to Ukrainian nationals by the Special Law: A changing picture

Before considering the Special Law, it should be noted that the legislator intended it to function alongside the legal acts already in force, particularly the Act on Foreigners⁶ and the Act on Granting Protection to Foreigners on the Territory of the Republic of Poland (Sejm RP 2023).^{7, 8} Apart from ensuring legal residence for Ukrainian nationals who arrived in Poland after 24 February 2022 – as the act refers to forced migrants – the general assumption made by the legislators, when creating the Special Law, was to temporarily equalise the status of Ukrainians with that of Polish citizens in many spheres of everyday life. An expression of this and, simultaneously, a means of realising the resulting rights, was to assign the forced migrants, in a simplified and rapid procedure, a PESEL (Universal Electronic Civil Registration System) number.⁹ In Poland, this number is used as the main way to identify residents when they are dealing with the state. For migrants, having this number was particularly important because it enabled them to receive social benefits, access public healthcare and enter the labour market.

In this latter area, in particular, the Special Law has provided for a number of solutions indicating Poland's intention to develop its policy. Already, in its original wording, there were regulations concerning the extension of the legal time for the provision of harvest assistance (Article 40), the possibility

to employ as an academic teacher (without the normally required competition procedure), a citizen of Ukraine who declares that, on 24 February 2022, he or she worked as an academic teacher in a university operating on the territory of Ukraine and possesses an academic degree and qualifications to hold the position (Article 46), facilitation of entry into the profession of doctor and dentist for Ukrainian citizens who obtained their qualifications outside the European Union (Article 61) and an analogous solution for these persons to practice the profession of nurse or midwife (Article 64). Shortly thereafter, the legislator added Article 23a, according to which war refugees, as well as citizens of Ukraine who are legally residing in Poland on another legal basis, may be employed in auxiliary and service positions in local government units and state offices.¹⁰ The Polish mining industry was also thought of by introducing the recognition of mining qualifications acquired in Ukraine and the possibility of employing such professionals in the Polish mining industry in positions corresponding to their qualifications (Article 23b).¹¹

It must be emphasised that, compared to the EU's Temporary Protection Directive or TPD, temporary protection under the Special Law had a narrower subject scope, limiting itself to Ukrainian citizens and thus leaving out people with citizenship of other countries also fleeing war-torn Ukraine. However, as one of our interviewees – a migration expert – said, the TPD did lay out the direction for the Special Law:

I think the government used the Directive to create conditions for refugees, which were good and are still generally good. But so that it doesn't, (...) become a very strong attraction or stimulation to stay in Poland in the end. (...) It seems to me, for the most part, that the [Special] law was set up at the dictates of the Directive. (...) On the other hand, of course, the government will always declare that it has created a Special Law [distinct from the Directive].

As we can see from this citation, one of the directions was to ensure the temporariness of stay and that all Member States propose more or less similar rights – i.e. not to make the stay in one country more attractive than in another. As confirmed also in other research (Łysienia 2023), the Special Law differed from the TPD. For example, providing forced migrants with a PESEL number was a specific solution of the Special Law. Also, providing subsidies for people who took migrants into their homes was a solution that went beyond the TPD's requirement for the state to provide accommodations. On the other hand, unlike the Special Law, the TPD guaranteed protection for those without Ukrainian citizenship who fled the invaded country.

The Special Law was initially issued for a year but was regularly extended. At the moment of writing this article, it was to remain in force until 30 September 2025.¹² The extensions were usually announced within a short time lapse with the TPD. It was unclear what the government's plans were after the Special Law.

Among the interviewed Ukrainian women, a clear difference is visible between those who were protected by the Special Law and those with a long-term migration experience in the 2 labour-market sectors. For the seasonal workers in agriculture we interviewed, who have been circulating for years between western regions of Ukraine and Poland, the mobility restrictions linked to PESEL UKR (it is only possible to be outside Poland for up to 30 days without losing the status) limits its attractiveness. The existence of this problem was pointed out, among others, in the ACAPS (2023) report and this also aligns with findings from research in Germany (Andrews *et al.* 2023). These agricultural workers preferred to continue circulating between Poland and Ukraine, where they have family members (often children) left, on a similar basis as in the past, using the simplified procedure. As one of the interviewees commented:

Because I can't work like this for a whole year without going away, well, because how do I... for example... It suits me... 3 months here, 3 months at home. And legally, you have to sit the whole year almost [in Poland].

In contrast, the interviewed migrant domestic workers found the PESEL UKR status attractive, as they spent most of the year working in Poland – their occupation not linked to the seasonal harvest – and they left only for short, one- or two-week holidays to check on their house and family back home. Those who continue circulating based on biometric passports or work visas and did not apply for PESEL UKR are those who temporarily replace, within the rotation system, those women who are working more long-term.

The regulatory dimension

The regulatory dimension of the migration infrastructure encompasses not only the rules governing entry, residence and employment access – such as the Special Law – but also their state enforcement mechanisms. The responsibility to enforce the Special Law was first placed by the government on the *voivods* (regional governors). However, one of our interviewees saw this application of the law as:

...unprepared and largely unsupported. Also, the law did not ask for voivods to work very closely with local governments. Or NGOs. This was a major sore point, because there were actually conflicts later on.

The fact that it did not provide competences nor impose obligations was also confirmed in other research (Magdziarz 2024). As an administration official noted, with time, labour offices created special lines with employees who speak Ukrainian and came up with ideas on how to reach employers who might want to employ Ukrainians.

Following the implementation of cash benefits, 2 types of benefit came to the fore in our research material. The '40 Plus' programme and the 'Good Start' or '300 Plus' one. The first referred to financial assistance for individuals as well as companies, in exchange for hosting forced migrants from Ukraine. Recipients of this financial assistance were granted 40 PLN (approximately 8.5 EUR) per day, per person hosted. According to our interviewees, some people who applied for this assistance did not receive it because their guests lost their PESEL UKR number during the hosting period (first 60 and, later, extended to 120 days). As one of our interviewees commented:

These Poles are refused these benefits, which means they don't get any money and, in addition, the Code of Administrative Procedure does not apply to these proceedings, so there is nothing to appeal against. It cannot be appealed. So it's a spiral of problems.

This was due to the fact that Article 13 (1a)¹³ of the Special Law stipulated that administrative decisions were not issued in cases of this monetary benefit and the provisions of the Code of Administrative Procedure did not apply. The one-time cash allowance of 300 PLN (approximately 70 EUR), meant additional work for social welfare centres, requiring them to check whether the person applying actually had a PESEL number. One of our interviewees, an official from a social welfare centre in a large city, described the situation:

Hundreds or thousands were flocking. It was an endless queue. We had to set up a system where there were seconded staff, downstairs, on duty to receive them, because one person couldn't handle it. (...) And

then when that wave passed but that wave since then... those people are still filing in but it's not so massive.

The situation looked different in rural areas, which had fewer forced migrants to assist. One of our interviewees, a Ukrainian woman who ended up with her 2 children in a community where she was the only Ukrainian, claimed that the local community and municipal administration were very supportive from the beginning in providing her with school benefits as well as employment. She said: 'They helped a lot, because, well, when I didn't understand anything at all, what it was about, well, they sorted everything out for us, some sort of a job for me there at the beginning as well...'. Even with this support, she initially worked in agriculture without a contract and claimed that she was paid less than Poles for the same work. Only with time did she manage to change to an official job in a different sector. Paradoxically, when it comes to access to the labour market, Svitlana, with 2 children – and only thanks to having first found a highly flexible, informal cleaning job – was able to use the opportunities offered by the municipalities, in terms of language courses and new job skills:

[Name of city] introduced a project. I don't remember what it's called properly but what you get there is that you're trained and taught for 3 weeks for 8 hours. (...) And then they give you an internship for 3 month. You pass this internship and then the employer looks at it and keeps you or does not keep you. So, I signed up with the girls here too. This is also organised by the local labour office – 40 places for people there with the status of the UKR.

Another challenge in implementing the Special Law was how to advise the forced migrants in light of an unclear and repeatedly amended legal act. For example, according to the Special Law, a person is not required to have the PESEL UKR to have protection (although he or she will not receive benefits). However, the parliamentary explanatory memorandum to this provision explicitly states that the legality of this person's stay depends on obtaining a PESEL UKR within 30 days.¹⁴ This 30-day deadline was, moreover, subsequently modified on several occasions (AIDA 2023a, b). As our interviewee from the central administration commented:

And then I do see some news that you have, in 30 days, to compulsorily [apply for the PESEL number], otherwise you will be illegal. And I think not... that if you don't do it in 30 days, because that, yes... it follows from the explanatory memorandum but it follows from the Special Law that getting temporary protection is not dependent on a PESEL.

Migrants were also concerned with the temporariness of their legal stay, including that of their children. Initially, the Special Law stated that temporary residence was to be granted after 9 months of stay in Poland (Art. 38). However, later on, the government backed out of this with the Act of 13 January 2023.¹⁵ This again changed, starting from 1 April 2023, with the restriction that only those Ukrainian nationals who are employed or self-employed can apply; however, this amendment did not include the children of these persons.¹⁶ As a representative of the central administration commented: 'Well, this is the kind of question we get every week and the answer is: "Please wait for the government's new solutions"'. Paradoxically, Ukrainian migrant workers were automatically treated as forced migrants by the administration. As our interlocutor complained:

All the provincial offices unlawfully do refuse to initiate county proceedings, including those Ukrainians who did not want to benefit from temporary protection at all. They came here because some company invited them, because the employers have nothing to do with the war. The war makes no difference to them at all. They simply came to Poland to work, for example, and they are automatically taken under temporary protection and cannot apply for credit either.

The accounts quoted above reflect, necessarily, only part of the problems arising from the hurried introduction of such complex regulations. It is worth noting that they concerned essentially all the major solutions adopted in the Special Law.

On 7 June 2024, the Polish President signed a further amendment to the Special Law. It extended until 30 September 2025 the legality of residence of Ukrainian citizens who arrived in Poland in connection with the full-scale war in Ukraine, as well as those whose residence documents (e.g. visas, temporary residence permits) expired after 24 February 2022. Similarly, access to health, family and social benefits and the possibility to stay in collective accommodation facilities, has been extended. It also implies the cessation (starting from 1 July 2024) of cash benefits for providing accommodation and meals to a Ukrainian citizen; private individuals who did so at their own expense will no longer receive support. The parental benefit (the so-called '500 plus') and 'Good Start' benefit will only be available to children studying in schools which are part of the Polish educational system. The parental benefit will also be available to children attending Polish kindergartens and/or who are not yet in compulsory education.

One of our interviewees commented that the temporariness of the Special Law is justified in the light of Ukraine's future:

My opinion is that a large part [of the forced migrants] should go back to Ukraine for the reason that Ukraine, without them, cannot, will not be able to rebuild itself and maintain its statehood. So I think that this temporariness should be maintained for a while yet.

However, a new pathway for further residence legalisation for Ukrainian citizens under temporary protection has been created. It will provide an opportunity to obtain a residence card (valid for 3 years)¹⁷ for those who had an active PESEL UKR on 4 March 2024, as well as on the date of the application for a residence card – and had this status uninterrupted for at least 365 days.¹⁸ The legislator intends this to ensure that people who have built up a 'real bond' with Poland, through the use of temporary protection, benefit from this solution. If, in the near future, the temporary protection under the Special Law ends, persons covered by it (and who meet the 'ties to Poland' criteria) will have a simplified opportunity to obtain a residence card. This legislation can also be seen as an attempt to incorporate some of those under temporary protection into the general immigration system.

The commercial and humanitarian dimensions

The commercial dimension comprises fee-based agencies and other labour recruiters or intermediaries responsible for facilitating, organising and expediting international mobility, while the humanitarian dimension primarily consists of non-governmental, non-profit organisations (Xiang and Lindquist 2014). Undoubtedly, the Special Law facilitated the work of migration-infrastructure actors in the humanitarian dimension. For the first time, they had to deal only to a limited extent with issues related to the legalisation of entry and residence. This enabled them to devote more time to finding work for migrants. As one of our interviewees, a representative of civil society, commented:

It is the Special Law that allows you to open a one-person business, that allows you to access the labour market normally – and it is also a great convenience for employers, because it was previously incumbent on them to make a work permit. Now they can actually normally hire a person from Ukraine, the same as Poles. So that's a huge, huge plus.

The importance of the assistance of civil society and, in particular, of migrant organisations, was also visible in the interviews with migrants. For example, one woman, who arrived after the outbreak of the war with her children and parents and who worked in the domestic work sector, commented:

Then we have a very good group now, a migrant centre in [name of town], run by D. [name of person]. There is also a lot of information. And before that there was or there is also their site 'Girls in [name of town], in Wielkopolskie'; they are very solidary. So I used such information, such resources.

However, despite the fact that the government did quite quickly reduce administrative procedures to a minimum, mainly by digitalising the process of accessing and navigating the labour market (see also Matuszczyk and Kowalska 2024), civil society had first to learn 'the new rules'. As one of our interviewees, a representative of a migrant organisation which, until recently, dealt mainly with the integration of labour migrants, said:

The Special Law has increased our workload. Analysing this law and providing information on it takes time. We also had to receive training on the law and we asked, for example, the [name of NGO] to provide us with such training, as the law was very general in places. In addition, there were 9 or 10 amendments. Even now, after almost a year and a half, we do not have a clear and transparent situation with the UKR PESEL. So there are a lot of questions and so far it has not been settled.

The organisation that provided them with training on the Special Law cited by this interviewee has a long-standing history of providing legal assistance to migrants, including forced migrants. Here, co-operation with civil society was essential, with a dynamic learning process by those organisations that have reoriented themselves to assist Ukrainian nationals seeking refuge. This was also confirmed in a number of other studies (Jarosz and Klaus 2023; Matuszczyk and Kowalska 2024). This interviewee also points to 2 other important aspects: the lack of clarity of the law and the continued amendments. One migrant organisation representative articulated the core need: a concrete, predictable timeframe. As they poignantly expressed it, what migrants truly seek is a commitment that 'until the war in Ukraine is over, there will be a Special Law... so that Poland will be stable, so that you can focus on finding work, on some long-term planning'.

Another important feature that comes to the fore in the interviews, adding to the chaos around the interpretation of the situation of migrants, is the fact that different legal orders collapse into each other. That was because Russia's full-scale aggression against Ukraine coincided with the final phase of the coronavirus pandemic. During the pandemic, a special legislation¹⁹ was adopted, also regulating the extension of the stay of Ukrainian citizens in Poland. A general rule has been adopted, according to which documents entitling foreigners to stay in Poland are valid for 30 days from the date of cancellation of the epidemic emergency by the authorities.²⁰ Many Ukrainian citizens in Poland held visas that were issued under other legal regulations. Thus, there were multiple legal statuses, depending on the date of the person's arrival in Poland. This caused understandable confusion among the migrants and required

a significant effort on the part of civil society and also commercial actors who provided legal assistance, to discern this legal state of affairs.

Numerous employment agencies engaged in activities, including legal aid, to assist the forced migrants in a better adaptation in the labour market (see also Matuszczyk and Kowalska 2024). Our interviewees representing employment agencies observed the legal uncertainty of not only the migrants but also the employers. As the representative of an intermediary company shared:

Most cases of illegal employment of foreigners in Poland today are not due to the bad will of the employer or the employee but because some formalities, deadlines, documents, guidelines and so on have not been observed, because someone has not caught on or is not keeping track of it. So, in terms of legalisation, a lot has changed and you have to have your hand on the pulse all the time and look at different regulations, not only at the level of laws but also at the level of regulations.

Certainly, the most important in this context was Article 22 of the Special Law, which required the employer to notify – within 14 days – the employment of a protected person (this deadline has been reduced to 7 days, starting from 1 July 2024²¹). However, the last sentence of the quoted statement indicates that those carrying out activities such as job placement have also had to contend with the complexity and volatility of regulations at the sub-statutory level.

Migration-infrastructure actors had to be careful not to contribute to the legal chaos by providing outdated information or refusing to give access to services. A civil society representative, herself a Ukrainian citizen, described these multiple legal orders during the interview as confusing not only for them but also for border guards:

The visa that was extended under the COVID Act gives me the right to cross the Polish–Ukrainian border and the one that was extended under the Special Law does not. (...) That was the biggest problem at the time.

According to our interviewees, the EU's TPD made up for certain shortcomings of the Special Law. The opportunity to reach for the TPD was provided by the fact that the Special Law required that the crossing of the border by a migrant when entering Poland after the outbreak of the full-scale war had to be recorded by the Border Guard (the TPD did not formulate formal requirements on how a person fleeing war should cross the border). As one of our respondents, a coordinator at a large organisation assisting migrants, including job search, told us:

In our practice, the Directive has helped, for example, those persons who have crossed the border illegally... because the Directive gives the possibility to legalise such a person. Actually, we have two forms of temporary protection [the Special Law and the Temporary Protection Directive].

Another case was where EU standards guaranteed certain benefits and Polish legislation conflicted with them. This was the issue, from a certain point, with the guarantee of a place of residence for people seeking refuge. As mentioned by our interviewee from civil society:

There was also more talk about the Directive when the subject of payment for stays in collective accommodation came up. As the Directive imposes such an obligation, it obliges EU countries to ensure access to the labour market, medical services and housing too.

One of the Special Law's amendments (dated 13 January 2023) made it compulsory for Ukrainian nationals to pay for stays in these places. In justifying this change, the legislator argued that it was needed to 'activate Ukrainian citizens residing in collective accommodation centres' (Sejm RP 2023: 9). However, the need for this activation has not been substantiated by data on the economic activity of the inhabitants of these centres.

An interesting case of how infrastructure actors from the social dimension impact on changes in the Special Law is the draft amendment to the law, which included the introduction of the institution of intercultural assistants into the Education Law.²² The task of intercultural assistants is to assist non-Polish nationals subject to compulsory schooling or compulsory education – who do not speak the Polish language or who speak it at a level insufficient to benefit from education – in their contacts with the school environment.²³ Their role is also to interact with their parents and the school. At the consultation stage of the law, a coalition of NGOs pointed out that the distinction between this function and that of a teacher's assistance was not clear enough. Experts predicted that the adoption of such a regulation would result in disorientation for school managers due to the confusion between their roles and tasks (FRS 2024). Despite the objections raised, the provision was enacted in its original form.

Overall, it was clear from our study that, in contrast to migrants in domestic work, migrants in agriculture – those who arrived both before and after the war – lacked or had very limited access to civil society organisations which could navigate them in the new legal reality. On the other hand, initially, for many Ukrainians, staying in the countryside was a 'good' strategy, mainly in the context of housing conditions – orchard owners simply had the facilities to host larger families. However, this was especially challenging, as not only did children not have access to schools but they also worked in the fields together with their parents.

The technological dimension

The technological dimension includes communication channels (such as social media) and transportation systems that enable physical border crossings (Xiang and Lindquist 2014). The Special Law has introduced the register of Ukrainian citizens who have been assigned a PESEL number in the ICT system (Article 6); known as Diia.pl, it has provided the legal basis for the creation of a trusted profile for Ukrainian citizens applying for a PESEL number (Article 9) and for the activation of the *mObywatel* application for Ukrainian citizens (Article 10), as well as an ICT system facilitating contact between Ukrainian citizens and employers (Article 22a). Although the central administration has translated many of the websites into Ukrainian and Russian and created sites for forced migrants to find jobs (see also Matuszczyk and Kowalska 2024), there are, according to our interviewees, challenges when it comes to the technological dimension of the migration infrastructure. For example, the system of applying online for a residence card is not well set up, which means that Ukrainian nationals will have to turn up in person at the offices. As one of our interlocutors from the central administration commented:

If the voivodeship office, by 1 April, does not get good access to the PESEL system, where these fingerprints are, we will not be able to take and confirm this data from this system and pull it into the residence system, so it will have to summon this Ukrainian. And so he or she has to come in, be at the window, wait, put up with his or her time and sacrifice the work of the office staff so that he or she can provide the fingerprints.

Notably, official government websites were absent from our migrant interviewees' information sources, while community-created platforms established by Ukrainian representatives, which are an intersection of the social and technological dimensions, emerged as critical communication channels. Our interlocutors looked to dedicated Facebook and Telegram groups for information. For example, Ulana is a 34-year-old from southern Ukraine who arrived with 2 children to Poland to join her husband – a labour migrant. She relied on both the internet and civil society to find out about the Special Law. As she said: 'Well, we have a migrant centre, there are girls there who can help you, there are bloggers here in Poland too, they explain quite well'. The combination of social media and Ukrainian local community initiatives also comes to the fore in another interview:

We have a very good group, it's 'ours in [name of town]', it's like a platform where Ukrainians who left Ukraine and settled in Poland and that's where everything is going on. You know, it's like in their own environment, I mean, someone got something and immediately posted 'I got something there'.

The social dimension

The social dimension of the migration infrastructure is mainly the social networks of migrants. In this article, we understand social networks to be dynamic social constructions, involving complex processes of communication, which (re)produce and change social relationships (Fuhse 2015). The interviewed migrants' social networks, especially of those who already had a temporary or long-term status of stay, were initially lacking relevant information concerning the Special Law. However, information about this act and its amendments dynamically turned into a network resource thanks to social media. As past research also shows (Homel 2020), Ukrainian-based networks of support and grassroots organisations, many of which are organised by women using social media, have quickly adapted to the emerging needs.

Ulana reflects on the pluses of how quickly the relevant information spreads via social ties: 'Word of mouth works faster. One person went to the municipality office, another person heard something and you already started to do something'. The network accumulates not only information but also trusted opinions about its relevance, from different sources. Such is the case of Svitlana, who arrived for the first time in Poland with the outbreak of the full-scale war but whose husband already worked as a truck driver in Poland. Svitlana learned about the rights linked to the Special Law through the wife of an acquaintance of her husband, a labour migrant with 18 years of migration experience. She helped Svitlana to arrange the documents:

Well his wife, [name], the acquaintance's wife, picked us up and, it turns out, took us to the PESEL, made travel passes, explained... She explained what to do, she helped us to register 500 Plus, in short, she did it all.

The Special Law has created different categories of migrants, creating some tensions within the Ukrainian diaspora. As one of the interviewed migration-infrastructure actors, who has set-up an intermediary work agency and who is a migrant from Ukraine herself, said:

I see more downsides than upsides there. (...) Because they gave too much. They gave too much. (...) I used to say that the refugees came first, those who came after 2022. In second place are the Poles and in third place are the ones like us who came earlier. (...) if you had come before the 23rd [of February], you are not human and, after the 24th, you have everything here.

This meant that some labour migrants drew social network boundaries, making some resources less or not accessible to migrants who arrived after the outbreak of the war.

According to our interlocutors, institutional spaces – where newcomers could interact with other people, including more-experienced Ukrainians – were also important when it came to finding out about access to rights. In the case of one of the migrant interviewees, it was a church:

[I]n our church, there's a gentleman like that (...) He's so involved, he helps a lot, too... Peter helped our Ukrainians with their documents and PESEL; whatever they did, he helped a lot. So he was very involved in that.

For Irina, who arrived in Poland in April 2022 with two children from an eastern region in Ukraine and had no previous ties to Poland or migration experiences, it was at the hostel for refugees where she stayed. A Ukrainian woman who worked at the hostel not only shared with her the information on how to legalise her stay but also took her to a place where she received her registration number – PESEL UKR – opened her bank account and received social insurance; she also shared with her information about housing possibilities. As she quickly received the information about the Special Law, her children were already enrolled in a Polish school by May 2022.

When it comes to access to housing benefits regulated by the Special Law, the 'settled' migrants also had an opportunity to participate when hosting their families or friends. As one of the interviewees, whose children had already been based in Poland for some time, commented: 'The children even received compensation for housing because they had 4 people living with them, all these; the 40 Plus programme, I think it was called'. However, social networks also served to warn against abuse. Acquaintances warned those who had received the PESEL UKR not to give their PESEL to homeowners, who were eager to participate in the 40 Plus programme, despite providing poor living conditions. Zenia, a 37-year-old, who joined her mother, a labour migrant, in Poland, said: 'And the girls warned me immediately not to give our PESELs to anyone'.

Those interviewees who had a PESEL UKR also faced challenges due to their returning to Ukraine even for a few days, due to a lack of communication between the different state actors:

We are fighting in ZUS [Social Insurance Institution] repeatedly. But so far we still have our [PESEL] UKR status... but for some reason, something went wrong somewhere. I can't figure it out. (...) It's from January, we were 5 days away and they stopped paying us. (...) So it's a real problem. I am not the only one but just talking to the girls who live and work here... (...).

This points to a dysfunction of the migration infrastructure, a rupture in the provision of assistance and missing interlinks between the different dimensions and within the dimensions – here regulatory.

Conclusions

How 'special' is the Special Law? The main aim of this legislation was to temporarily equalise the legal status of all Ukrainian nationals arriving in Poland after the outbreak of the war with that of Polish citizens, thereby avoiding the need for individual applications, as required through the international protection pathway. This law simultaneously became an instrument for Poland to create its policy, which operated parallel to the Temporary Protection Directive and was to some extent distinct from it. The intent of the Polish legislator was signalled at the very beginning by limiting the scope of the

protection granted to Ukrainian citizens (and their family members), as well as by introducing preferential conditions of employment for representatives of certain professions who were among the forced migrants from Ukraine. Creating one's 'own' law also gave the Polish legislator flexibility for later modification of the scope of assistance provided to migrants, including the introduction of provisions limiting it. From this point of view, this approach was exceptional both within the Polish legal order as well as the broader EU system for granting temporary protection.

While this legislation created unprecedented legal protection for forced migrants, its enforcement revealed significant challenges. The law lacked clear enforcement mechanisms and dedicated funding, creating uncertainty for implementing organisations. Humanitarian, commercial and social actors had to rapidly familiarise themselves with the law while adapting to its frequently changing rules and timelines. The complexity of the application of the law is evident in the law's frequent modifications – by November 2024, it had undergone 29 amendments. Organisations with existing connections to migration infrastructure and past refugee-assistance experience were best positioned to navigate these changes. They used established networks to quickly understand and implement the new requirements. Next, migrant organisations and social-media platforms emerged as the most effective channels for communicating essential information to forced migrants.

Although the Special Law (as part of the regulatory dimension of the migration infrastructure) was a great convenience for people who wanted to find temporary refuge in Poland, it did not facilitate mobility as the definition implies. From a formal point of view there was no ban on leaving Poland but the mobility of Ukrainian nationals under its protection was limited by the 30-day absence rule. Thus, it did not contribute in that sense to the migration capabilities of forced migrant women from Ukraine – an example of involution, as Xiang and Lindquist (2014, 2018) would have phrased it.

One critical challenge facing Ukrainian migrants is the pervasive lack of prospects – neither in Poland, where temporary protection offers no long-term stability, nor in Ukraine, where basic security remains absent. Interestingly, our interviews revealed that migrants did not strongly emphasise the temporary nature of their status, which can be attributed to 2 key factors. First, at the time of our research, migrants were primarily focused on their immediate adaptation and survival, rendering long-term considerations secondary. Second, when comparing Ukrainian forced migrants' experiences to past Ukrainian labour migrants' ones, it is clear that the latter have historically navigated highly uncertain legal environments, making this state of legal uncertainty almost a norm.

The Special Law's impact on migration patterns reveals complex dynamics. Far from halting temporary labour migration, it has instead integrated forced migrants into the same labour-market sectors, often subjecting them to similarly precarious working conditions as labour migrants. This is particularly challenging for migrants with children and care responsibilities, who face limited workplace flexibility. While temporary protection offers critical rights previously unavailable under labour-migration schemes, it paradoxically fails to accommodate the inherent mobility of this population. Forced migrants continue to maintain transnational connections, mirroring established labour-migration patterns. They frequently cross borders to check on family members – husbands, elderly parents or adult children – who remain in Ukraine, underscoring the persistent need for familial and social connectivity despite displacement.

This analysis concludes by highlighting critical avenues for future research. Will the extensive support for newly arrived forced migrants continue? Do non-governmental organisations and other actors today still offer basic support to Ukrainian migrants as they did in 2022 or have they gone further and are now dealing with integration? Similarly, as Olga Wanicka (2024) has done so among Filipino migrants, it would be important to find out more about the role of micro-influencers, such as bloggers or vloggers, in communicating information about the rights of forced migrants' from Ukraine. Taking into

account our findings, too, we need to learn more about how the Special Law's enforcement differs in smaller towns, where cross-sectoral cooperation and social networks operate distinctly from urban centres. When it comes to the commercial dimension, how sustainable were the interventions of employment intermediaries traditionally disconnected from forced-migrant protection? Last, but not least, what role do social networks play in cross-sectoral knowledge exchange regarding the regulatory framework?

The Polish government is currently working on a comprehensive migration policy reform to take effect after September 2025. The proposed changes include greater control over migrant employment and introducing stricter regulations that will require employers to hire foreign workers through formal employment contracts. Still, when it comes to forced migration, the Special Law's temporary nature exposed a fundamental limitation: assistance remained heavily skewed towards immediate reception rather than long-term integration. Moreover, the 'special' designation of the law raises a profound theoretical and practical question: Is this state of exception – characterised by provisional rights – potentially becoming a new normative framework for migrant protection?

Notes

1. *Journal of Laws* 2022, item 583; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20220000583/U/D20220583Lj.pdf>.
2. The Act of 13 June 2003 on granting protection to aliens within the territory of the Republic of Poland, *Journal of Laws* 2003 No. 128, item 1176 as amended; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20031281176/U/D20031176Lj.pdf>; <https://www.asylumlawdatabase.eu/en/content/en-law-13-june-2003-granting-protection-foreigners-within-territory-republic-poland>.
3. *Official Journal* L 212, 07/08/2001 P. 0012 – 0023. <https://eur-lex.europa.eu/eli/dir/2001/55/oj/eng>.
4. However, this did not exclude the possibility for persons without Ukrainian citizenship to benefit from temporary protection under the Act on granting protection to foreigners within the territory of the Republic of Poland.
5. *Journal of Laws* 2021, item 2354; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20130001650/U/D20131650Lj.pdf>.
6. *Journal of Laws* 2013, item 1650 as amended; <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=wdu20130001650>.
7. *Journal of Laws* 2003 No. 128, item 1176 as amended; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20031281176/U/D20031176Lj.pdf>.
8. On the position of the Special Law in the context of the aforementioned laws: Drembkowski (2022); Józwiak and Tygielski (unpublished); Klaus *et al.* (2022); Szczepański (2023); Szmid and Sawicki (2022).
9. According to data from the Polish Office for Foreigners, on 31 January 2024, 947,031 people had an active UKR PESEL. As of 24 February 2022, it had been assigned nearly 1.8 million times (*Office for Foreigners Report...*). This indicates the scale of leaving Poland by Ukrainian citizens after they have already been assigned a PESEL number.
10. *Journal of Laws* 2022, item 830; <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20220000830>.
11. *Journal of Laws* 2023, item 185; <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20230000185>.
12. *Journal of Laws* 2022, item 583 as amended; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20220000583/U/D20220583Lj.pdf>.

13. Introduced on 27 April 2022 *Journal of Laws* 2022, item 930; <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20220000930>), subsequently repealed on 15 May 2024 *Journal of Laws* 2024, item 854; <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20240000854>).
14. Government draft law on assistance to citizens of Ukraine in connection with the armed conflict on the territory of that country, print 2069; (<https://www.sejm.gov.pl/sejm9.nsf/druk.xsp?nr=2069>).
15. *Journal of Laws* 2023, item 185; <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20230000185>.
16. *Journal of Laws* 2023, item 185; <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20230000185>.
17. Art. 42p of the Special Law; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20220000583/U/D20220583Lj.pdf>.
18. Art. 42c of the Special Law; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20220000583/U/D20220583Lj.pdf>.
19. Act of 2 March 2020 on special arrangements relating to the prevention and control of COVID-19, other infectious diseases and emergencies caused by them, *Journal of Laws* 2020, item 374 as amended; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20200000374/U/D20200374Lj.pdf>.
20. The state of epidemic emergency was revoked in Poland as of 1 July 2023 – Regulation of the Minister of Health of 14 June 2023 on the revocation of the state of epidemic emergency in the territory of the Republic of Poland (*Journal of Laws* 2023, item 1118; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20230001118/O/D20231118.pdf>).
21. Art. 1(14) of the Act of 15 May 2024 amending the Law on assistance to citizens of Ukraine in connection with the armed conflict on the territory of the country and certain other laws, *Journal of Laws* 2024, item 854; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20240000854/O/D20240854.pdf>.
22. Art. 165(8a) of the Act of 14 December 2016 – Education Law, *Journal of Laws* 2017, item 59; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20170000059/U/D20170059Lj.pdf>.
23. <https://asywszkole.pl/asystemtura-miedzykulturowa/>.

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Revisiting the Concept of Flexibility in Temporary Protection Practices at the Intersection of International Refugee and Human-Rights Laws: The Case of Türkiye

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The absence of a comprehensive international law instrument regulating temporary protection has led to its flexible application, which has been deemed effective in managing large-scale forced migratory movements. By focusing on the intersection of international refugee law and human rights law, this article critically re-evaluates the concept of flexibility in temporary protection from a legal perspective, primarily based on current practices in Türkiye. By analysing the dual dimensions of flexibility – rule-making and implementation – it highlights how broad discretion can, when exercised without adequate legal safeguards to ensure legal certainty and consistency with the rule of law, risk disproportionately limiting fundamental rights and creating a legal limbo for displaced individuals. The analysis demonstrates that these challenges are exacerbated by the lack of effective international responsibility-sharing mechanisms and the reliance on temporary protection measures. These measures, which operate independently of the 1951 Refugee Convention, are designed to provide flexibility as a potential solution. Ultimately, by presenting the Turkish practice, the article argues that, while flexibility is essential in responding to emergencies, the unchecked application of flexibility risks threatening the integrity of the international protection regime, prioritising administrative convenience over legal accountability. This study underscores the need for a more balanced approach that aligns flexibility with robust legal safeguards, ensuring both state adaptability and the protection of individuals' rights.

Keywords: temporary protection, flexibility, responsibility sharing, Türkiye, international protection

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Introduction

Hervé Zwirn (2009) introduces the concept of ‘empirical blindness’ in the context of physics, describing it as the inability of a theory to perceive certain aspects of empirical reality. As a result of empirical blindness, the structured framework on which the theory relies remains silent on how these overlooked aspects behave. This limitation can prevent a theory from being adequately challenged, as its unexamined details may escape scrutiny, allowing flaws to persist due to a lack of empirical testing. While the interplay between physics and law, as explored by scholars like Tribe (1989) and Wright (1991), is a fascinating field of inquiry, it falls outside the scope of this article. Nevertheless, Zwirn’s metaphor of empirical blindness serves as an effective framework for examining this study’s objectives and methodology for 2 key reasons.

Firstly, the study seeks to question the flexibility feature often attributed to temporary protection as an asset (Ineli-Ciger 2018; UNHCR 1994, 2014) by examining its manifestations in legal practice. In so doing, it illuminates areas of relative blindness where this flexibility, when used in an excessive manner, might obscure crucial aspects of legal certainty and the international protection regime. Specifically, the article questions the boundaries of flexibility and critically assesses their alignment with the principles of the international protection and human rights framework, such as access to durable solutions and legal safeguards on the limitation of fundamental rights, with findings grounded in practical legal application.

Secondly, the study focuses on the practice of temporary protection in Türkiye – one of the 2 most significant contemporary practices of temporary protection – offering a perspective distinct from the other, which is shaped by the European Union (EU) and applied by EU member states. Although the EU adopted the Temporary Protection Directive (2001/55/EC) (TPD) in 2001, it was not implemented until 2022, following the Russian invasion of Ukraine. The European Union’s *sui generis* legal and institutional framework introduces complexities that set it apart from solely state-led models. As a supranational entity, the EU employs a multi-level governance approach that relies on harmonisation between member states rather than merely the discretionary flexibility observed in national frameworks. However, certain EU member states, such as Poland, are argued to apply temporary protection in a manner that closely mirrors Türkiye’s approach, demonstrating a similar reliance on state-driven discretion (Kosiel-Pająk and Sadowski 2023; Łysienka 2023). While this paper focuses on Türkiye, Poland’s experience illustrates that, even within the EU, national-level adaptations can reflect similar patterns to the flexible and responsive protection mechanisms of non-EU states, as in the case of Türkiye. Nonetheless, Türkiye is used as the primary case study because the article specifically examines the flexibility of temporary protection in relation to its direct compatibility with (inter)national refugee law and (inter)national human rights law. A focus on an EU member state, such as Poland, would require a more layered analysis incorporating the additional dimension of the EU law, which extends beyond the direct scope of this study. Furthermore, limiting the analysis to Türkiye helps to mitigate the risk of empirical blindness – that is, the tendency to overlook the practical implications of flexibility in favour of abstract legal frameworks. By concentrating on a non-EU country operating outside supranational legal constraints, this paper provides a clearer assessment of the objective consequences of discretionary temporary protection policies. Türkiye has implemented temporary protection informally since 2012 and formally since the adoption of the Law on Foreigners and International Protection (LFIP) in 2014, making it a particularly relevant case for examining the operational realities of a state-driven approach to temporary protection.

Temporary protection encompasses various mechanisms but this article adopts the understanding of temporary protection as set out in the United Nations High Commissioner for Refugees (UNHCR)

Guidelines on Temporary Protection and Stay Arrangements. Within this context, temporary protection is viewed as a response to the sudden, large-scale arrivals of forced migrants. According to the guidelines, it is a pragmatic, interim and exceptional tool of international protection that embodies the commitment of states to offer refuge to individuals escaping humanitarian crises with a complementary function (UNHCR 2014). A key reason for relying on the above guidelines is that temporary protection does not have a content that is clearly and directly regulated in detail by a binding international legal instrument. The qualification of temporary protection (or temporary refuge) as a norm of customary international law has been discussed in the legal literature (Goodwin-Gill 2014; Ineli-Ciger 2018; Lambert 2017; Perluss and Hartman 1986) but there is no definitive consensus on the matter within academic discourse.

While international refugee law and human rights law establish binding obligations on *non-refoulement* and the protection of fundamental rights, these principles are not explicitly and universally mandated in the context of temporary protection. In the absence of a standardised and binding international framework, states retain significant discretion in how they implement temporary protection measures (Fitzpatrick 2000). In practice, the creation of an ideal temporary protection regime, one that aligns with international refugee law and international human rights law, depends solely on the effective measures taken by domestic legal systems to establish the necessary legal safeguards (Ineli-Ciger 2016a).

Although the history of practicing temporary protection as a response to mass forced migration flows dates back to earlier times, the emergence of this protection in the European context coincides with the 1990s for the EU member states that are parties to the 1951 Refugee Convention. During the crises in the former Yugoslavia, temporary protection was initially implemented on an *ad hoc* basis to address the urgent need for refuge (Joly 2002; Kjaerum 1994). This experience eventually led to its formalisation at the EU level, culminating in the adoption of the TPD, one of the Union's secondary legal instruments that comprise the EU's Common European Asylum System. The more-intensive focus of the legal scholarship on temporary protection started in this period and continued with Türkiye's application of temporary protection to the large numbers seeking asylum due to the civil war in Syria (Elçin 2016; Ineli-Ciger 2015; Lambert 2017; Öztürk 2017; Yılmaz 2016; Yılmaz Eren 2018), the EU's reluctance to apply temporary protection to the Syrians (Genç and Öner 2019; Ineli-Ciger 2016b; Koo 2018) and then the EU's activation of the TPD for those fleeing the war in Ukraine (Carrera and Ineli-Ciger 2023; Küçük 2023; Trauner and Valodskaitė 2022).

The connection between temporary protection and flexibility has been previously addressed in both the legal scholarship and UNHCR sources, though not in depth. These discussions predominantly focus on the theoretical aspects of temporary protection and/or its potential applications (Fitzpatrick 2000; Ineli-Ciger 2015; Koo 2018; UNHCR 2014) rather than on its flexibility in practical implementation. While some analyses draw insights from practices during the Former Yugoslavia War (Joly 2002; Kjaerum 1994; Onken 2005), the *ad hoc* nature of temporary protection at that time, combined with the lack of formal codification within the EU framework, has led to these insights being framed in largely hypothetical terms. More-recent studies following the EU's adoption of the TPD and/or its activation, on the other hand, have shifted the focus towards addressing practical protection challenges (Carrera and Ineli-Ciger 2023; Hierro and Maza 2024; Küçük 2023) rather than directly exploring flexibility in implementation. Similarly, Peerboom (2023) critically examines the evolving concept of 'flexible responsibility' within the EU's asylum and migration policies, focusing on the draft Asylum and Migration Management Regulation that was under negotiation at the time (later adopted in 2024). However, his piece emphasises potential future challenges, not actual implementation. Biorklund

Belliveau and Ferguson's study (2023) on the other hand, can be regarded as a comprehensive analysis of implementation in Türkiye (and Mexico) that aligns with the focus of this article. However, their examination of Türkiye's approach to temporary protection successfully emphasises the impact of temporariness and uncertainty on individuals, interpreting it through the lens of the normalisation of exceptionalism rather than exploring the legal aspects of flexibility *per se*.

This article defines flexibility from 2 dimensions. The first dimension refers to the state's authority to design the rules governing the temporary protection regime, where flexibility denotes the state's ability to create adaptable legal frameworks. The second dimension of flexibility relates to the practical application of these rules, particularly the discretion available to those responsible for their implementation.

In essence, legal rules are intended to be applied to specific, real-world situations, which inherently requires a certain degree of flexibility. This flexibility allows legal rules to be adapted to the unique circumstances of each case, ensuring that the most fair and effective outcomes are achieved (Goldenziel 2014; Helfer 2012; Sobota 1991). However, flexibility is not a limitless virtue – when it lacks clear legal constraints and oversight, it turns into *excessive flexibility*, where adaptability shifts into unpredictability and unaccountability. Excessive flexibility occurs when the legal framework is so open-ended or discretionary that it undermines the predictability, consistency and rights-based nature of legal protections. In such cases, flexibility no longer serves as a tool for fair governance but, rather, as a means to evade legal obligations. If flexibility is not accompanied by clear limitations and oversight, it risks evolving into unfettered discretion, where decisions are made without adequate legal safeguards or accountability. While discretion is an essential feature of legal decision-making, ensuring adaptability in the application of law, excessive or unchecked discretion can undermine legal certainty, enabling arbitrary decision-making. Such arbitrariness poses a risk of shifting outcomes from being fair to being unlawful, thereby undermining the rule of law and principles of legal certainty (Helfer 2012; Super 2011; Wolff 2011).

Within the context of temporary protection, this dual-faceted concept of flexibility must be carefully balanced. While the ability of states to design adaptable legal frameworks is essential for addressing the dynamic nature of mass influxes, the discretion afforded to administrative actors in the implementation phase must be subject to legal safeguards (Durieux 2014; Fitzpatrick 2000). Without these safeguards, flexibility could be misused, leading to unpredictable and inconsistent practices that not only violate human rights but also challenge the integrity of the international protection regime (Peerboom 2023).

Against this backdrop, this article offers a comprehensive critique of the role and functioning of flexibility in the context of temporary protection. By analysing Türkiye's temporary protection regime as a case study, it provides a more nuanced and empirical understanding of how the theoretically identified risks of excessive flexibility are reflected in legal practice. In so doing, the article sheds light on how flexibility affects legal certainty, expands state discretion and shapes the protection of fundamental rights, thereby offering a grounded and practice-informed contribution to current academic debates.

The article is structured as follows. The first section defines the theoretical framework of flexibility in temporary protection through the positioning of temporary protection within the international protection regime. The second section outlines Türkiye's experience with temporary protection and its practical legal implementation before the final section presents a brief discussion of the broader implications of these findings.

Questioning the legitimacy and the extent of flexibility through the positioning of temporary protection within the international protection regime

The relationship between flexibility and temporary protection is perhaps best captured by Fitzpatrick's statement that 'temporary protection is like a magic gift, assuming the desired form of its enthusiasts' policy objectives' (Fitzpatrick 2000: 280). This description not only highlights the inherent flexibility of temporary protection but also reflects the dual dimensions of the relationship between flexibility and temporary protection, which shift depending on the underlying political objectives. These objectives may aim to address the *necessity* of filling a protection gap – often by maintaining the balance between freedom and security – or to actively shift this balance point in accordance with political preferences. In this sense, *flexibility* becomes a powerful instrument, a 'gift' that can either fulfil an urgent need or facilitate a preference-driven policy shift.

Given this dynamic, assessing the legitimacy and limits of flexibility requires an examination of the necessity that justifies its use (Sobota 1991). Therefore, the evaluation in this section focuses on the concept of necessity as it relates to temporary protection and addresses it through 2 key dimensions. First, it explores how temporary protection is positioned in relation to international protection by examining the theoretical and practical justifications for their interrelationship. Second, this analysis informs a discussion of the potential risks regarding excessive flexibility related to findings reached in relation to the first dimension.

From a theoretical legal perspective

An evaluation of scholarly debates and UNHCR sources concerning the theoretical positioning of temporary protection reveals that the most prominent justification for this protection is its role in *filling a protection gap* and its complementary nature (Ineli-Ciger 2016c; Türk 2015; UNHCR 2014). The concept of a protection gap is often linked to claims that the existing international refugee law regime, rooted in the 1951 Refugee Convention, does not explicitly address critical issues such as the protection of mass influxes, the displacement of people caused by armed conflicts or the role of the principle of *non-refoulement* in the context of mass influx (Edwards 2012; Fitzpatrick 1996; Ineli-Ciger 2016c; Türk and Dowd 2014).

Building on this conceptualisation of the protection gap, several fundamental questions remain open to debate: Why does this protection gap exist? What is the role and nature of temporary protection in filling this gap? Central to this debate is the characterisation of the protection gap itself. Is it a normative gap (legal *lacuna*) or does it stem from practical concerns? The way in which this question is answered has significant implications for understanding the scope and limits of flexibility in the application of temporary protection. If the gap is perceived as a normative gap – an absence of applicable legal norms under international refugee law, a legal *lacuna* – the resulting flexibility may be justified as a necessary response to an unregulated area. However, if the gap is caused by limitations in practice rather than a legal *lacuna*, then flexibility in the application of temporary protection is subject to greater scrutiny, as it could be viewed as a means of circumventing existing legal obligations. This distinction underscores the importance of identifying whether temporary protection addresses a true normative deficiency or simply offers a pragmatic response to operational challenges posed by large-scale displacement.

The limitations regarding the applicability of the 1951 Refugee Convention to situations of mass influx or displacement caused by armed conflicts are not solely inherent in the Convention's normative framework but are also a consequence of interpretive methods and tendencies adopted by states and

legal actors. Scholarly perspectives suggest that the emphasis on individual status determination and the narrow definition of a refugee, based on limited grounds of persecution, reflects a particular interpretive approach rooted in textual formalism and strict construction (Durieux and McAdam 2006; Fitzpatrick 1996; Ineli-Ciger 2018). This method prioritises an individualised, case-by-case assessment of refugee status, thereby sidelining the possibility of a broader, group-based approach. Similarly, the applicability of convention rights to individuals in mass-influx situations is ultimately a matter of interpretation. Hathaway and Neve (1997: 158–160) contend that, in light of the 1951 Refugee Convention's declaratory definition of a refugee and the degree of an individual's attachment to the asylum country, even those whose status has not yet been formally recognised would be entitled to certain rights under the convention. Within the framework of temporary protection, such individuals would be regarded as asylum-seekers and, accordingly, would benefit from convention-based rights until their status is officially determined. This approach illustrates that the declarative nature of the refugee definition under the 1951 Refugee Convention allows for inclusive interpretations, enabling a direct link between convention-based rights and individuals seeking asylum in mass-influx situations, even in the absence of a formal recognition of refugee status. Likewise, the argument that the principle of *non-refoulement* does not impose an obligation on states to admit large groups of displaced persons is tied to an interpretive tendency to frame *non-refoulement* narrowly as a duty of non-return rather than as an obligation to grant entry (Durieux and McAdam 2006). As Gammeltoft-Hansen and Hathaway (2015) argue, such restrictive interpretations are often influenced by state interests and the desire to limit obligations under the 1951 Refugee Convention. This interpretive discretion illustrates how the perceived *gaps* in the 1951 Refugee Convention's coverage of mass-influx situations are, to a significant extent, constructed through the interpretive lens applied to the convention, rather than being a reflection of a normative *lacuna* in the legal framework itself. As Koskeniemi (2006: 8) explains, 'meaning is not (as we commonsensically assume it to be) inherent in the expression itself'. Instead, interpretation is an active process of constructing meaning rather than revealing hidden meaning from the text (Tobin 2010: 5). This perspective also underpins the understanding of human-rights treaties, including the 1951 Refugee Convention, as *living instruments* – legal texts whose application evolves through dynamic and context-sensitive interpretation (Ineli-Ciger 2018).

For states which are party to the 1951 Refugee Convention, the existence of a normative gap requires more than mere uncertainty (Koskeniemi 2016: 372, Lauterpacht 2016[1958]: 441; Siorat 1958) regarding the applicability of the convention's provisions to specific situations. A true normative gap exists only where there is a complete absence of an applicable legal norm. As Hernández (2014: 241–252) explains, as long as ambiguity can be resolved through the process of interpretation, it cannot be classified as a *lacuna* signalling the absence of a legal norm. In this context, the perceived gap in the relationship between the 1951 Refugee Convention and the protection of mass influxes through temporary protection, which the UNHCR has described as 'unclear' (2001: 3), does not arise from a normative deficiency in the convention itself. Instead, it stems from an implementation gap created by interpretive ambiguity. The absence of explicit provisions on mass-influx protection does not necessarily signify a lack of legal norms; rather, it reflects the challenge of operationalising the 1951 Refugee Convention's principles in response to large-scale, complex displacement scenarios (Durieux and McAdam 2006).

From a practical perspective

The fact that the need for temporary protection does not stem from a normative gap but from a practical gap calls into question what this practical need is all about. Essentially, this practical gap derives from the absence of a fair and effective system for sharing the responsibility for international protection (Durieux 2014). While the 1951 Refugee Convention establishes a comprehensive legal framework for refugee protection, it does not impose binding obligations on states to equitably distribute the responsibility for protection. The convention's preamble acknowledges that 'the granting of asylum may impose an undue burden on some countries' and emphasises that effective protection requires 'international cooperation'. However, beyond this recognition, the convention fails to specify how this cooperation should be implemented (Hathaway and Neve 1997), thereby leaving a crucial gap in practice (Türk and Garlick 2016). Fitzpatrick (1996) argues that the lack of enforceable obligations for responsibility-sharing reduces the 1951 Refugee Convention's capacity to function as a comprehensive framework for responding to contemporary refugee crises.

This shortcoming becomes especially pronounced in situations of mass influx, where the need for large-scale, immediate protection exposes the limitations of the 1951 Refugee Convention's individualised status determination model. In practice, states are often reluctant to bear the weight of protection obligations alone, especially in the absence of international support or the prospect of early return for displaced persons. As Field (2010) and Ineli-Ciger (2016c) emphasise, the absence of a system for fair responsibility-sharing leaves host states vulnerable to disproportionately large burdens. Without mechanisms to distribute responsibilities among states, host countries face administrative, financial and political pressures.

In this case, the main question to be asked in terms of the necessity of temporary protection and its position in the international protection regime should be the following: How is temporary protection envisaged to address this concern about responsibility-sharing? In its simplest form, this question can be answered through 2 alternatives. The first alternative is that temporary protection can alleviate this concern by having a positive effect on the sharing of responsibility for international protection. The second is that it can reduce this concern by creating a wide area of flexibility, allowing states to shape the obligations that may arise from elements of the international protection regime – such as rights, guarantees and access to durable solutions, in line with their own political preferences. This approach was evident in Europe during the 1990s, where states introduced *ad hoc* temporary protection mechanisms to manage the influx of displaced persons from the Yugoslav Wars (Roxström and Gibney 2003). As Kjaerum (1994) explains, this shift reflected a preference for flexibility and efficiency over strict compliance with the individualised status-determination procedures of the 1951 Refugee Convention. An examination of the UNHCR (2014) guidelines also suggests that this approach has been adopted in promotion of the temporary protection as a pragmatic 'solution'.

The UNHCR guidelines build on international consultations held, *inter alia*, at 2 Round Tables on Temporary Protection in 2012 and 2013 – which aimed to define the scope and minimum standards of temporary protection – and an Expert Meeting on International Cooperation for Burden-Sharing and Responsibility-Sharing in 2011. The 2011 Consultation emphasised that 'international cooperation' is a principle underlying international law but confirmed that the sources containing this principle do not specify how international cooperation should be implemented (UNHCR 2011). As a matter of fact, this background is summarised in the guidelines, which emphasise that responsibility-sharing is essential for the effectiveness of temporary protection. However, what remains unclear is how temporary protection, as structured within the guidelines, serves as a concrete mechanism to alleviate the

responsibility-sharing problem. While the guidelines stress the necessity for international cooperation, they do not explicitly articulate how temporary protection itself operates as a tool to facilitate or enhance responsibility-sharing beyond a general recognition of its importance. Therefore, it is understood that the temporary protection framework outlined in the guidelines does not promise a function in eliminating the issues related to international responsibility-sharing, which constitute the primary cause of the practical gap that 'necessitates' temporary protection.

On the other hand, the guidelines emphasise *flexibility*, *pragmatism* and *context-specific interventions* as key components of temporary protection (UNHCR 2014). Thus, at its core, the temporary protection regime structured in the guidelines seems to focus on the second alternative mentioned above, i.e., mitigating the problems arising from the lack of international protection responsibility by giving states a wide range of manoeuvrability. This approach, however, calls into question the position of the limits of this leeway for states *vis-à-vis* the binding framework of international-refugee and human-rights law. The guidelines appear to be quite *flexible* in favour of states in this regard. The guidelines underline that temporary protection should be 'without prejudice' to the obligations under the 1951 Refugee Convention, the 1967 Protocol and human-rights treaties. However, this safeguard is not operationalised in a concrete manner. For instance, while the guidelines identify minimum standards for the treatment of persons under temporary protection, they do not firmly establish that these standards are legally binding under refugee or human-rights law. Instead, the guidelines frame the minimum standards as *prescribed* recommendations, allowing states to interpret and apply them according to their capacity and context by referring to the UNHCR Executive Committee Conclusion No. 22, a non-binding instrument, to set out these standards (UNHCR 2014). Additionally, the guidelines frame temporary protection as an emergency-driven mechanism designed to address large-scale displacement caused by humanitarian crises where conventional refugee-protection frameworks are inadequate (UNHCR 2014). Emphasising the need for speed, flexibility and immediate implementation, the guidelines highlight temporary protection as a pragmatic tool, an interim solution for crisis management rather than a long-term solution. The guidelines further express the possible challenges that states may face in situations of mass influx as concerns, such as protection costs, security, ensuring orderly border management and the difficulty or impossibility of status determination. These challenges are framed within the broader discourse of emergency-driven responses to mass displacement, where the guidelines emphasise the necessity for flexibility in state responses to large-scale movements (UNHCR 2014). When these concerns are read in conjunction with the emergency and crisis framing, along with the emphasis on flexibility, they may be considered to allow states to justify deviations from established protection and human-rights standards (Roxström and Gibney 2003).

In light of this analysis, certain conclusions can be drawn. First, the necessity for temporary protection arises not from a normative gap in international refugee law but from a practical gap linked to the absence of a fair and enforceable system of responsibility-sharing for international protection. Second, rather than functioning as a mechanism to ensure responsibility-sharing, temporary protection addresses practical concerns by introducing flexibility into international obligations. This flexibility allows states to have a wide area of manoeuvrability in shaping their responsibilities related to rights, guarantees and access to durable solutions according to their preferences. Third, the characterisation of temporary protection as an *exceptional* and *emergency* measure positions it as an interim solution designed to provide immediate relief in response to urgent crises. The way in which temporary protection is framed allows states to justify suspending full compliance with the 1951 Refugee Convention by presenting it as an emergency response. Rather than establishing a clear and binding link

between the convention's obligations and temporary protection, the framework leaves this connection to the discretion of individual states, potentially leading to gaps in legal protection.

Finally, by portraying temporary protection as a pragmatic solution, its legitimacy within the international protection regime is justified on functional grounds rather than based on legal norms.

The risks regarding (excessive) flexibility

As highlighted in the previous subsection, the defining characteristic of temporary protection as a solution is its flexibility. In theory, when applied in a balanced manner, flexibility mechanisms allow states to uphold their human-rights commitments by adapting their obligations to the specific demands of a given situation rather than outright disregarding them (Goldenziel 2014; Helfer 2012). Indeed, flexibility and discretion should not be regarded as inherently detrimental features of international protection regimes. As Hathaway underscores, because the refugee status is explicitly conditioned on the continuation of a risk for refugees in the state of origin, the refugee protection was never intended to guarantee the permanent integration of refugees into a new political community; rather, it seeks to ensure protection grounded in dignity and rights until conditions in the country of origin permit a safe return (Hathaway 1997: 551, 554–555). Within this understanding, a calibrated degree of discretion may be both necessary and legitimate, particularly in the early stages of a mass influx, allowing states to respond rapidly to humanitarian emergencies. The challenge lies in ensuring that such discretion remains rule-bound and proportionate: just as rigid, onerous rules can lead to violations due to implementation hardship, excessive flexibility can similarly result in deviations from legal obligations, particularly when states face economic, political or social pressures. If flexibility mechanisms are too easily invoked, they may incentivise self-serving decision-making (Helfer 2012), ultimately distorting the fundamental purpose of human-rights protection. Granting states excessive discretion in implementing temporary protection measures has profound implications for the intersection of forced migration and human rights. When political expediency takes precedence over legal commitments, unchecked flexibility risks compromising the coherence and effectiveness of human-rights safeguards, ultimately eroding the integrity of the broader human-rights framework. This concern is particularly acute in contexts where extreme flexibility amplifies state control over migration governance, exposing international migration – especially forced migration – to the risks of discretionary and inconsistent state practices. This vulnerability stems from 3 interconnected factors that make international migration particularly susceptible to state action in highly flexible legal environments. These factors are equally relevant to forced migration and even more pronounced for individuals in need of international protection.

First and foremost, the management of migration is intricately linked to economic, political and social determinants, which shape the scope of state action within its sovereign jurisdiction. In this context, a state's sovereign jurisdiction over its territory can sometimes be used as a scythe to curtail the rights of non-citizens, especially in cases of forced or irregular migration. Costello uses the term 'statist assumption' to connote that states have a sovereign right to exclude aliens without justification. She rightfully indicates that although the 'statist assumption' seems out of place in an age of human rights, it remains stubbornly ingrained in the context of migration (Costello 2016: 10). Indeed, the wide margin of appreciation regarding migration afforded by the European Court of Human Rights (ECtHR) could clearly reflect this situation. The term 'margin of appreciation' refers to the leeway that the Strasbourg organs are willing to grant national authorities in fulfilling their obligations under the European Convention on Human Rights (ECHR) (Greer 2010: 2). A review of the ECtHR case law shows that states

have a wide margin of appreciation in the area of migration control. While the ECHR does not recognise migration control as a legitimate aim *per se*, the ECtHR has consistently interpreted it as falling within the aims enumerated in paragraph 2 of Article 8, that is, the grounds on which a state may lawfully limit the right to respect for private and family life, most notably the protection of public order and the economic well-being of the country¹ and has applied similar reasoning under other provisions. In *Abdulaziz, Cabales and Balkandali v. United Kingdom*² and *Moustaquim v. Belgium*,³ the court affirmed that decisions concerning the entry, residence and expulsion of non-nationals fall primarily within states' sovereign competence, subject only to ECHR safeguards. In subsequent expulsion and border-control cases, such as *Saadi v. Italy*,⁴ *Hirsi Jamaa and Others v. Italy*⁵ and *N.D. and N.T. v. Spain*,⁶ the court acknowledged states' legitimate interest in maintaining the integrity of their migration systems, while emphasising that such control must be exercised compatibly with absolute rights such as the prohibition of torture or degrading treatment (ECHR, Art 3). Under the right to liberty and security (ECHR, Art. 5), the court has repeatedly held that the necessity or proportionality of immigration detention need not be examined in the same manner as for criminal detention,⁷ thereby granting states broader latitude in depriving migrants of liberty for purposes of removal or entry control. Likewise, the court has consistently found that deportation and removal proceedings do not engage with the right to fair trial (ECHR, Art. 6) on the grounds that such measures concern the entry, stay and expulsion of aliens and are therefore matters of immigration control rather than the determination of civil rights or criminal charges.⁸ Taken together, these strands of jurisprudence confirm that migration control, though not a stand-alone legitimate aim, has come to represent a domain of broad state discretion, reflecting both the absence of European consensus and the court's deference to national authorities in matters closely tied to sovereignty and public policy.

Secondly, a reason that makes migration vulnerable to excessive flexibility is that it is open to instrumentalisation in close connection with domestic or international political dynamics (Castles, de Haas and Miller 2014; Galloway 2021). Hence, it can also fall within – or at least be related to – the scope of social, economic or security-related policies, which may constitute legitimised reasons for the state's freedom of action (Altunbaş and Memişoğlu 2024; Garcés 2022; Guild 2009).

Thirdly, the lack of international cooperation is another reason that makes forced migration, in particular, vulnerable to overly flexible state action. At this point, it is possible to characterise international cooperation in terms of both monitoring the implementation of human-rights law and the reaction of the international community to violations, as well as its role in sharing the responsibility to protect. It is argued that, unless there are special circumstances leading to human-rights cooperation, states that are not inclined to protect human rights for domestic political reasons may have a tendency to not fulfil their human-rights obligations (Goldsmith and Posner 2005: 115).

Bearing in mind these vulnerabilities of (forced) migration, when the position of temporary protection, as shown earlier, is considered, it is inevitable that the risks arising from excessive flexibility become evident. As a matter of fact, the emergency and interim nature of temporary protection carries the risk of placing the protected population in an 'exceptional' position, especially due to security concerns. Designating a subject as a 'security' issue, on the other hand, can lead to its prioritisation on the political agenda (Altunbaş and Memişoğlu 2024: 36; Buzan, Waever and de Wilde 1998: 21–26). The perception and extent of the threat are constructed through discourse, engendering a sense of emergency that justifies actions aimed at addressing the perceived threat (Buzan, Waever and de Wilde 1998: 21–26).

Evaluating temporary protection in a manner detached from 1951 Refugee Convention obligations, emphasising its *flexibility* as an advantage precisely by drawing attention to the ambiguity of its

relationship with the convention, may risk arbitrary state actions in practice. It can be argued that at the core of this risk lies the perception of protection as a preference or favour rather than being based on the binding obligations of international refugee law. Indeed, the fact that the admission of a mass influx is *disconnected from the 1951 Refugee Convention* reinforces the impression that the mass is admitted to the country only at discretion (Akram and Rempel 2004: 13–15). Hence, rather than being based on the fulfilment of an obligation, the fundamental rights and freedoms of the ‘tolerated’ or ‘discretionary’ community also face the risk of being restricted in a disproportionate and arbitrary fashion.

This situation also risks the status of individuals under temporary protection to be characterised as ‘quasi-legality’ (Perez 2016)⁹ owing to the exceptional and interim nature of such protection. The detachment of temporary protection from the 1951 Refugee Convention may result in individuals under this status not being classified as *applicants* for international protection unless otherwise indicated in the national laws, as states are not obliged to proceed with status determination procedures during the time of temporary protection. The UNHCR suggests imposing a time limit on this form of protection (UNHCR 2014). However, if responsibility cannot be shared effectively, the underlying reasons for urgency persist, leading to uncertainty regarding the status of the population when the time limit expires. Hence, the legal status of the mass may be termed as a state of ‘quasi-legality’ when the definitive boundaries of the transitory nature of this interim state are ambiguous.

Questioning the extent of flexibility based on the practice of temporary protection: The case of Türkiye

Background

In the early 2000s, Turkish asylum law underwent significant changes as Türkiye aimed to become a full member of the EU. The European Council’s Accession Partnership Document in 2001 and its revision in 2003 marked the beginning of a period of ‘EU-isation’ (İçduygu 2007) in the development of Türkiye’s asylum system. This period led to the coming into force of Türkiye’s first legal framework directly addressing international protection, the Law on Foreigners and International Protection (LFIP), in April 2014. In the same year, the Temporary Protection Regulation (TPR) was published to clarify the scope and the procedure of temporary protection available for people in mass-influx situations. Since then, temporary protection is provided to the citizens of the Syrian Arab Republic, stateless persons and refugees who have arrived at or crossed Turkish borders coming from the Syrian Arab Republic since 28 April 2011 (provisional art. 1 of the TPR). Due to a later amendment on 7 April 2016 following the EU–Türkiye Statement of 18 March 2016, the TPR was amended to also be applicable to Syrian citizens who irregularly reached Aegean islands from Türkiye after 20 March 2016 but were subsequently readmitted to Türkiye. According to the latest statistics of the Presidency of Migration Management (PMM 2024), the number of temporarily protected persons under temporary protection in Türkiye is 2,920,119.

Furthermore, Türkiye is a party to the 1951 Refugee Convention, International Covenant on Civil and Political Rights (ICCPR) and the ECHR. However, Türkiye maintains a geographical limitation on its application of the 1951 Refugee Convention, meaning that it only applies to refugees whose protection claims are derived from events happening in European countries. Despite this limitation, Turkish law on temporary protection, as established under Article 91 of the LFIP, applies without distinction to the country of origin of the displaced population. The TPR, which operationalises the LFIP, also makes no reference to the geographical limitation and the only provision linked to Syria is a *provisional article*

relating to the activation of temporary protection. Importantly, the same regulatory framework would apply if Türkiye were to activate temporary protection for populations fleeing from a European country, such as Ukraine (Öztürk 2022a). This demonstrates that the legal framework of temporary protection in Turkish law is not subject to a geographical limitation, contrary to what was assumed by some scholars at first glance (Durieux 2014: 245; Ineli-Ciger 2016c: 432; Lambert 2017: 726).

Flexibility in rule-making

Article 91, as the single article in the LFIP that addresses temporary protection, recognises this protection in relation to mass influx by stating that

temporary protection may be granted to foreigners who have been forced to leave their country, who are unable to return to the country they left, who arrive at or cross borders en masse in order to seek urgent and temporary protection.

In the same provision, the president is authorised to issue a regulation to manage temporary protection. The TPR, which is the main source governing temporary protection in Turkish law, was put into force based on this authorisation. Therefore, the substantial and procedural matters of this protection are not regulated by an Act of Parliament (law in the strict sense). Instead, these issues are covered within a Regulation (TPR), which is of the nature of an administrative regulatory act, a secondary legal source. According to the relevant article of the LFIP, the matters that are authorised to be regulated by a regulation include: the measures to be taken for the reception and prevention of mass influx; the rights, obligations, stay and exit of persons within the scope of the influx; cooperation and coordination between (inter)national institutions; and the determination of the duties and powers of central and provincial institutions.

In Turkish law, the relationship between laws and regulations is clarified by the Constitution (Const.). Under the Constitution, the President of the Republic, ministries and public legal entities (in general the administration/administrative authorities) may issue regulations to ensure the implementation of laws and presidential decrees concerning their respective fields of activity, provided that they do not contradict with the laws (Arts. 104 and 124, Const.). Hence, it is essential that the authority of the administration to regulate is in accordance with the law (*intra legem*) and that this authority is based on the law (*secundum legem*). The functions of the principle of reliance on law include democracy and legitimisation, ensuring legal certainty and quality of law and effective judicial review, as well as the rule of law and the prevention of arbitrariness (Sever 2021). Sever points out that general authorization rules, in which the administration is completely free to make case-by-case evaluations without any criteria, are considered unacceptable when it comes to legal certainty and the limitation of powers in the rule of law (Sever 2021: 81). In fact, weak norms that do not contain sufficient detail, the tendency towards framework provisions using open-ended concepts or practices such as symbolic law-making, where the administration is given wide powers to determine the content, are factors that increase the possibility of arbitrariness in terms of the principle of the administration's reliance on the law (Sever 2021: 81). The risk posed by such practices is rooted in the extensive flexibility granted to the administration. Moreover, it is important to highlight that the constitution explicitly mandates that fundamental rights and freedoms may only be restricted by statutory law (Arts. 13 and 16 of the Const.). Consequently, any attempt to impose limitations on these rights and freedoms through regulations and or presidential decrees (Const., Art. 104) would amount to a breach of constitutional law.

When the relevant provision of the LFIP on temporary protection (Art. 91) is analysed, it is seen that the administrative agencies are granted an overly broad and flexible power in the field of rule-making and that this power lacks sufficient detail. This situation also raises doubts in terms of the fact that this broad authority may pave the way for regulations that result in the restriction of fundamental rights and freedoms (Elçin 2016: 34; Öztürk 2015: 426; Yılmaz 2016: 136; Yılmaz Eren 2018).

Indeed, the questionable impact of the administrative authorities' broad authority under the TPR can be observed through 2 key dimensions. The first pertains to the extent to which temporary protection aligns with its intended role as an interim, exceptional and complementary form of protection, while the second concerns its implications for access to fundamental rights and freedoms for those under temporary protection.

Firstly, the TPR's approach to temporary protection shows a separation from the international protection system, functioning as an independent framework largely governed by administrative discretion (Öztürk 2015: 426, 427; Yılmaz 2016: 134). The TPR stipulates that international protection applications will not be processed for individuals under temporary protection (Art. 16 TPR). While this restriction may appear logical within a short-term emergency framework, it becomes increasingly problematic in light of the regime's indefinite duration. Unlike the EU's Temporary Protection Directive (TPD), which sets a clearly defined temporal framework – initially valid for 1 year and extendable up to a maximum of 3 (Art. 4 TPD) – Türkiye's temporary protection regime contains no statutory upper limit. Consequently, individuals may remain under 'temporary' protection indefinitely, as in the case of Syrians in Türkiye. This open-ended structure diverges from the TPD's design, which links temporary protection to the principles of temporariness and gradual transition toward durable solutions. The contrast also extends to the scope of rights and procedural guarantees. Under the TPD, beneficiaries retain the right to apply for international protection at any time (Art. 17 TPD), thereby preserving the possibility for those with well-founded claims to obtain international protection statuses. The TPR, in contrast, explicitly suspends the processing of such applications (Art. 16 TPR), effectively closing this channel and reinforcing the regime's exceptional and exclusionary nature. Furthermore, the TPD establishes objective and collectively determined criteria for the termination of temporary protection, which may only end when conditions in the country of origin allow for safe and durable return and, in any case, cannot exceed 3 years (Art. 6 TPD). Under the TPR, however, the decision to terminate temporary protection rests solely with the President of the Republic and is not guided by substantive criteria (Art. 11 TPR). This absence of both temporal and substantive limits transforms an emergency-oriented mechanism into a tool of long-term governance, undermining its foundational logic of exceptionality and temporariness. By contrast, the EU's time-bound and criteria-based framework, despite its imperfections, introduces an essential safeguard against indefinite displacement, ensuring that flexibility operates within predictable and legally constrained boundaries. Türkiye's open-ended model, conversely, risks normalising what was originally conceived as a temporary and extraordinary response, leaving beneficiaries in a sustained state of uncertainty that ultimately erodes the *exceptional and transitional character* of temporary protection itself. This lack of legal certainty raises serious concerns about the regime's effectiveness as a complementary and interim protection mechanism and blurs the expected (Ineli-Ciger 2018: 41) normative clarity between emergency relief and long-term protection (Biorklund Belliveau and Ferguson 2023).

Furthermore, the absence of a secure legal link between temporary protection and the international protection system has significant consequences for individuals under temporary protection, particularly regarding their access to durable solutions. A secure link would involve a legal safeguard that ensures individuals under temporary protection can transition to individual (international)

protection statuses, at least following the expiration of a designated time-limit for temporary protection. Such a mechanism would provide a clear procedural pathway to long-term protection, reducing legal uncertainty and preventing an indefinite reliance on temporary protection measures if the protection need continues after the anticipated time limit. However, under the current Turkish framework, no such safeguard exists, leaving beneficiaries dependent on discretionary state decisions regarding their future status.

By its very nature, temporary protection is designed as an emergency response to provide immediate refuge without establishing permanent residency pathways. While it may grant access to employment and education, these measures are intended to support self-sufficiency during the temporary stay, not to facilitate permanent local integration. Local integration, as a durable solution, involves a legal process leading to permanent residence rights and, potentially, citizenship, an economic process towards sustainable livelihoods and a social process fostering harmonious coexistence with the host community (Crisp 2023). Temporary protection frameworks typically do not encompass these comprehensive processes, thereby not serving as a pathway to durable local integration (Bratanova van Harten 2003; Crisp 2023). Since temporary protection in Türkiye does not provide clear pathways to individual protection statuses that would allow for local integration or resettlement, voluntary return is the only viable, durable solution left (Ihlamur-Öner 2022). Hence, the prolonged period of temporary protection raises broader concerns about the role of temporary protection in situations of protracted displacement, keeping displaced persons in legal limbo, with their rights and status subject to administrative discretion (Gökalp Aras and Şahin Mencütek 2021; Öztürk 2017: 254; Yılmaz Eren 2019).

Secondly, the TPR provides excessive flexibility for the access to and the limitation of fundamental rights. One of the most striking manifestations of this is the broad permission granted to the administrative authorities to impose detention measures. The TPR (Art. 8) authorises the detention of persons who are excluded from temporary protection without requiring a formal administrative detention decision. This provision fails to establish clear rules on the duration, conditions or review mechanisms for such detention, nor does it provide access to appeal mechanisms. The absence of procedural safeguards violates key principles enshrined in international human-rights law, particularly the right to liberty and security under Article 5 of the ECHR and relevant standards secured under the Turkish Constitution (Arts. 13, 16, 19) (Öztürk and Öztürk 2023).

A similarly problematic provision is found in Article 35 of the TPR, which authorises administrative authorities to impose partial or total restrictions on the enjoyment of rights – except for education and emergency health services – on individuals under temporary protection who fail to fulfil their obligations despite receiving an official warning. Under the TPR (Art. 20), temporarily protected individuals are required to comply with various legal and administrative duties, including residing in designated areas, providing updated information on their employment, income and family status and adhering to reporting obligations set by the authorities. If they fail to fulfil these obligations within the required timeframe, they are first formally warned by the relevant administrative units and subjected to judicial or administrative proceedings. If the non-compliance persists, pursuant to Article 35 of the TPR, authorities may restrict their access to certain rights, including the revocation of their right to remain outside temporary accommodation centres, either temporarily or indefinitely. The problem with this provision is that it lacks the legal safeguards typically required for such restrictive measures – namely, proportionality, necessity and legal certainty. Additionally, it contravenes the constitutional requirement that such restrictions be established by statutory law rather than by a regulation (Öztürk 2017: 253; Yılmaz 2016: 136). Moreover, the scope of the administration's discretion under this article

is so broad that it raises doubts about potential infringements on the essence of fundamental rights, further reinforcing its incompatibility with constitutional principles.

Another critical issue is the lack of protection against deportation for persons under temporary protection. Article 32 of the 1951 Refugee Convention guarantees that refugees cannot be expelled except on grounds of public order or national security. Importantly, this protection applies not only to formally recognised refugees but also to asylum-seekers who are legally present in the country, even if their status has not yet been formally determined. This guarantee is further codified in Article 54(2) of the LFIP, which extends this protection to individuals seeking international protection. However, the same safeguard is notably absent in the TPR. Instead, persons under temporary protection may be issued deportation decisions,¹⁰ provided that *non-refoulement* is effective, on any of the broader grounds for deportation under Turkish domestic law.

Flexibility in the application of rules

As demonstrated in the preceding sub-sections, Türkiye's regulatory framework for temporary protection is structured in a manner that leaves the limits of flexibility somewhat ambiguous and undefined. This ambiguity is particularly evident in a legal climate where the state's capacity is limited (Öztürk 2022b). In such a context, granting broad discretionary authority to the administration is often seen as a pragmatic management strategy, as it enhances the administration's ability to respond swiftly and effectively to emerging challenges. However, this broad flexibility also introduces significant legal risks.

One key factor influencing the implementation of flexibility is the international community's reluctance to share responsibility. A notable example of this is the EU's approach to the mass influx of refugees from Syria. While the EU's contribution to financial responsibility-sharing is viewed as a positive development, the EU–Türkiye Statement of 18 March 2016 highlights that this support is contingent on containment measures (Öztürk 2020; Ulusoy, Yigit-Aksu, Ineli-Ciger and Ovacik 2025). This suggests that the financial contribution serves more as a means of externalising responsibility rather than genuinely sharing it (Roman 2022). Furthermore, the lack of a balanced approach to physical responsibility-sharing reinforces this perspective. This situation has prompted the Turkish administration to prioritise control and management over adherence to refugee protection standards (Öztürk 2022b).

In relation to the lack of effective responsibility-sharing, domestic political factors may have also played a significant role in shaping how flexibility is exercised. The growing prominence of anti-immigrant political discourse and the corresponding public demand (Balta, Elçi and Sert 2022) for stricter migration controls may have influenced the state's use of its flexible powers. In response to rising public pressure, the administration has tended to rely on these broad discretionary powers as a means to control the presence and movement of displaced persons. This dynamic is likely to contribute to the institutionalisation of excessive flexibility in administrative practices, often resulting in measures that are more focused on migration control than on refugee protection.

One of the most notable examples of this is the restriction on the freedom of residence and movement of individuals under temporary protection. Following the implementation of the temporary-protection regime, a non-public circular was issued requiring persons under temporary protection to obtain a *travel permit* in order to leave their designated province of residence. Although this requirement has no explicit legal basis in either the TPR or the LFIP, it has been enforced in practice as a binding rule. This additional requirement lacks legal certainty and predictability, as it was introduced without a formal

regulatory basis. Failure to obtain the travel permit may result in restrictions on the access to rights for those under temporary protection (TPR, Art. 35). Considering that temporary protection does not have an upper time limit, this measure poses a risk of disproportionately restricting an individual's freedom of movement and residence for an indefinite period. Prolonged restrictions of this nature, without clear legal safeguards or review mechanisms, contradict established principles of necessity, proportionality and legal certainty under international human-rights law. In particular, the UN Human Rights Committee's General Comment No. 27 on Article 12 of the ICCPR underscores that any restriction on freedom of movement must be lawful, necessary to achieve a legitimate aim and proportionate to that aim (paras 14, 15 and 16). It further emphasises that such measures must be the least-intrusive option available and must not impair the essence of the right itself (para. 13). Article 12 of the ICCPR explicitly protects the right to freedom of movement for individuals who are lawfully present in a country, including foreigners with regularised legal status. Given that temporarily protected individuals reside in the country with state-issued permission based on their *legally* recognised temporary protection status, they fall within the scope of this provision and are entitled to the safeguards established therein. These principles are equally relevant in Turkish constitutional law (Const. Arts 13 and 16), reinforcing the need for safeguards against arbitrary restrictions on movement for individuals who are legally present in the country. However, the inconsistent application of such safeguards and the lack of clear legal avenues for challenging restrictions raise concerns as to whether the legal status of temporarily protected persons may, in practice, amount to a form of *quasi-legality*, wherein rights are formally acknowledged but not meaningfully guaranteed.

Another example of the consequences of excessive flexibility relates to the practice of voluntary return. In the absence of an effective system of physical responsibility-sharing, voluntary return is effectively promoted as the only feasible durable solution for those under temporary protection. However, the concept of voluntary return must be critically assessed within this context. When the return is framed not as a durable solution but as a means to reduce administrative burdens and manage migration more efficiently, the voluntariness of such returns becomes questionable. In this context, the concept of voluntary return risks being distorted, shifting from a durable solution based on free will to a mechanism that serves as a tool for migration control. Evidence from judicial decisions reveals that some return processes have been initiated or carried out without providing the affected individuals with the necessary legal safeguards.¹¹ Such practices raise significant concerns about the risk of violating the principle of *non-refoulement*, which prohibits returning individuals to situations where they may face torture and inhuman or degrading treatment.

These examples illustrate how the already flexible structure of temporary protection becomes even more expansive in practice, especially in a context where physical responsibility-sharing is ineffective. While the regulations governing temporary protection are already marked by broad discretion, the way in which they are implemented in practice demonstrates a significant intensification of flexibility. This highlights how flexibility, initially justified as a mechanism to address emergency situations, has been operationalised to prioritise administrative control over legal accountability. As such, the risks posed by excessive flexibility extend beyond the regulations themselves and are magnified during their implementation.

The overall effects of excessive flexibility within the broader international protection regime

The legal consequences of an overly flexible application of temporary protection can extend beyond the domestic framework of the implementing state, potentially impacting on the international protection regime as a whole by creating a precedent for lower protection standards.

Firstly, highlighting the flexibility of temporary protection as a solution risks diverting attention from the core issue driving its practical necessity: the absence of meaningful responsibility-sharing for international protection. The EU–Türkiye case exemplifies how states continue to evade equitable and effective responsibility-sharing, underscoring a persistent unwillingness to address this fundamental challenge. Consequently, the extent to which temporary protection can genuinely serve as a viable solution becomes increasingly questionable. In this scenario, it becomes inevitable that the flexibility associated with temporary protection – which is intended to offer adaptability as an emergency and interim response – is expanded beyond its legitimate scope. This development raises a fundamental question about the role of temporary protection: Is it truly an *interim solution* for individuals needing protection? This question takes on particular significance when viewed from the perspective of the durable solutions that underpin the international protection regime. International protection is traditionally oriented towards achieving durable solutions such as resettlement, local integration or voluntary return. However, in practice, the overly flexible implementation of temporary protection which hinders the access to international protection statuses, risks narrowing the range of possible solutions, often leaving voluntary return as the only available option, as seen in the Turkish case. In such a context, voluntary returns may occur prematurely, driven not by the free will of the individuals *per se* but by the pressure to relieve administrative burdens or to demonstrate political control over migration.

Another example that highlights the risks of excessive flexibility is the interplay between Türkiye's temporary-protection regime and the concept of a safe third country. Türkiye's system, which does not permit transitions to individual international protection statuses, has been included by some EU member states, such as Greece, on their lists of safe third countries for Syrian asylum-seekers (AIDA 2023: 157, 158; Pirello 2024; Tsiliou 2018). While the Court of Justice of the European Union (CJEU) has not yet ruled definitively on whether Türkiye meets the criteria for such designation under the EU law, Türkiye's inclusion into safe-third-country lists for Syrian asylum-seekers carries significant implications (Strik 2019).

Under EU law, a country can only be deemed a safe third country if it provides protection aligned with the 1951 Refugee Convention.¹² However, Türkiye's temporary protection framework falls short of these standards (Poon 2016; Roman, Baird and Radcliffe 2016; Şimşek 2017; Ulusoy 2016), as it limits access to individual protection statuses and lacks essential procedural safeguards (Öztürk 2015). Despite these shortcomings, Greece's decision to designate Türkiye as a safe third country effectively legitimises this excessive flexibility. By accepting Türkiye's temporary-protection regime as meeting 1951 Refugee Convention standards, deviations from international legal obligations are normalised and justified. This represents a risky trend for a troubling shift in the approach to protection, where adherence to international law is increasingly compromised in favour of pragmatic considerations.

While the foregoing analysis identifies the dangers of excessive flexibility, it is equally important to recognise that an overly restrictive interpretation of state discretion may produce adverse systemic effects. In an era marked by recurrent and large-scale displacement, states that perceive their capacity for responsive action as unduly constrained may resort to deterrence policies or border closures, thereby undermining the protective aims of the international refugee regime itself. A measured and legally framed flexibility, anchored in transparency, proportionality and accountability, can therefore

operate as a stabilising element, preserving states' willingness to cooperate within the protection system. The sustainability of the international protection framework ultimately depends on striking this delicate balance: flexibility sufficient to ensure functionality yet constrained enough to safeguard rights and legal certainty.

Conclusion

This study examined the interplay between flexibility and temporary protection, analysing both its theoretical underpinnings and its practical implications. The main argument explored is that temporary protection, often presented as an effective response to emergencies caused by mass influxes, relies heavily on the notion of flexibility. To assess this argument, the study first questioned the necessity and function of flexibility as one of the core features of temporary protection. This assessment was grounded in an analysis of the role and status of temporary protection within the international-protection regime, with particular attention to its relationship with the 1951 Refugee Convention.

The study concludes that the often-cited *gap-filling* function of temporary protection does not address a normative gap in international refugee law but, instead, addresses a practical gap. This practical gap primarily arises from the absence of a binding, enforceable system for the fair and effective sharing of responsibility for international protection. In essence, it reflects the difficulty that states face in shouldering the responsibility for protection when dealing with large-scale influxes of displaced persons. Rather than addressing this structural challenge through responsibility-sharing mechanisms, temporary protection offers a pragmatic and interim solution which emphasises flexibility as a way in which to ease the pressures on states. However, this dominant framing reflects a form of *empirical blindness*, as it prioritises flexibility as a virtue without critically assessing its real-world consequences. This approach shifts the focus away from long-term, durable solutions and towards a system that relies on state discretion and administrative control, with implications for accountability and legality. The Turkish case serves as a key empirical test of this assumption, demonstrating how excessive flexibility in the application of temporary protection can create systemic gaps in both domestic law and the international-protection regime.

The crux of the issue is not that states lack guidance on how to implement a temporary-protection regime that is in line with the 1951 Refugee Convention and international human-rights law. Rather, it stems from the fact that states seek to avoid the binding obligations imposed by the 1951 Refugee Convention and related human-rights treaties. The presentation of temporary protection as a *non-convention* mechanism serves to legitimise this avoidance strategy. This is another manifestation of empirical blindness: the assumption that states require greater flexibility to ensure protection when, in reality, this flexibility often functions as a tool for circumventing binding legal commitments. By framing temporary protection as distinct from the 1951 Refugee Convention, states can position it as a more flexible and discretionary tool, allowing them to circumvent the obligations they would otherwise face under international law. This approach is further reinforced by the way in which obligations are framed as mere recommendations, as is the case for the UNHCR guidelines, rather than enforceable legal requirements. Such framing creates a perception that adherence to refugee and human-rights standards in temporary protection is optional rather than mandatory, thereby perpetuating the belief that a temporary-protection regime fully compliant with the 1951 Refugee Convention and human-rights instruments is unrealistic or utopian.

While this study highlights the dangers of excessive flexibility, it also recognises that a complete curtailment of state discretion could inadvertently weaken the international protection system. States

confronted with recurring large-scale displacement may respond to rigid legal frameworks by adopting restrictive or exclusionary measures. A calibrated balance between flexibility and legal accountability is therefore essential to sustain the functionality of the regime and to preserve states' willingness to cooperate within it.

It is important to clarify that this analysis does not rest on a simplistic or naïvely idealistic view that mere recognition of 1951 Refugee Convention-based obligations would instantly resolve the challenges observed in practice. Ensuring that temporary protection is implemented in a lawful and rights-compliant manner requires a comprehensive, multidimensional approach that addresses the broader structural issues and systemic gaps within the refugee-protection regime. This involves tackling existing challenges related to responsibility-sharing, access to rights and accountability mechanisms. However, it is equally evident that promoting temporary protection through its flexible notion only serves to entrench these problems further. If flexibility is framed as a justification for non-compliance, it reinforces the *empirical blindness* that legitimises arbitrary discretionary governance over displaced persons rather than the rule of law.

Notes

1. See for instance, *M.A. v. Denmark* App No 6697/18 (Grand Chamber, ECHR, 9 July 2021), para. 143; *Biao v. Denmark* App No 38590/10 (Grand Chamber, ECHR, 24 May 2016), para. 117; *B.F. and Others v. Switzerland* App No 13258/18 and 3 others (ECHR, 4 July 2023), para. 96.
2. *Abdulaziz, Cabales and Balkandali v. United Kingdom* App No 9214/80 9473/81 9474/81 (ECHR, 28 May 1985), para. 67.
3. *Moustaquim v. Belgium* App No 12313/86 (ECHR, 18 February 1991), para. 43.
4. *Saadi v. Italy* App No 37201/06 (Grand Chamber, ECHR, 28 February 2008), paras. 124, 125.
5. *Hirsi Jamaa and Others v. Italy* App No 27765/09 (Grand Chamber, ECHR, 23 February 2012), para. 179.
6. *N.D. and N.T. v. Spain* App No 8675/15 8697/15 (Grand Chamber, ECHR, 13 February 2020), para. 167.
7. *Saadi v. United Kingdom* App No 13229/03 (Grand Chamber, ECHR, 29 January 2008), 72.
8. *Maaouia v. France* App No 39652/98 (Grand Chamber, ECHR, 05 October 2000), paras 38-40.
9. Perez's work is referred to only for the terminology.
10. In practice, numerous deportation decisions have been issued concerning Syrians, with the majority citing public order as the justification. However, some decisions have been based on other grounds as well. Notably, a significant proportion of these deportation decisions that were subjected to judicial review have ultimately been annulled, highlighting the judiciary's critical role in scrutinising and overturning such measures. The following decisions can be given as examples: İzmir 1. Administrative Court 2020/469 E. 2020/1426 K.; İstanbul 1. Administrative Court 2019/3136 E. 2020/798 K.; Edirne Administrative Court 2022/153 E. 2022/568 K.; İstanbul 1. Administrative Court 2021/1327 E. 2021/2949 K.
11. See, for instance, İstanbul 1. Administrative Court 2019/2674 E. 2020/2194 K.; *Akkad v. Türkiye* App No. 1557/19 (ECHR, 21 June 2022); Abdulkерim Hammud, App. No. 2019/24388 (Constitutional Court, Individual Application), 02 May 2023; *Avad Elhamud*, App. No. 2020/5628 (Constitutional Court, Individual Application), 11 June 2024; *Ali ElHüseyin*, App. No. 2020/5730 (Constitutional Court, Individual Application), 12 June 2024.

12. See Art. 38 of the Directive 2013/32/EU of the European Parliament and of the Council of 26 June 2013 on common procedures for granting and withdrawing international protection (recast) (Asylum Procedures Directive).

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The Temporality and Stratification of Refugee Governance in Turkey: An Analysis for Temporary and International Protection from Reception to Return

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Turkey faces significant challenges in managing refugee governance, hosting over 3 million protection beneficiaries across various categories, including ‘international’, ‘temporary’, ‘subsidiary’ and the distinct ‘conditional refugee’ status. This framework is characterised by legal ambiguities and a complex protection regime that relies on stratified legal statuses and temporality throughout all stages of refugee management. This paper analyses the temporary and international protection regime and its implications for Syrians and non-Syrians under these protection types, covering the 2018–2024 period, with a specific focus on the ‘return’ dimension. The paper questions how temporality and legal stratification operate as strategic governance tools in Turkey’s refugee regime, shaping the management of Syrians under temporary protection from reception to return. It argues that temporality is a deliberate governance strategy rather than a mere legal condition and that legal stratification institutionalises selective inclusion and control. Temporality and stratification are interconnected mechanisms that sustain governable precarity and they are also used to control the conditions for return. In this framework, the paper explores governance through temporality and its implications at the macro level by examining the legal and institutional frameworks and reflecting on the experiences or perceptions of relevant actors at the meso and micro levels. The research is based on a longitudinal study, desk research, multilayered analysis and multi-sited field research across 4 cities (Ankara, Edirne, Istanbul and Izmir), supported by 2 European Union-funded Horizon projects.

Keywords: temporary protection, international protection, Syrians under temporary protection, temporality, stratification, migration governance, migrant returns

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Introduction

Turkey occupies a critical position in contemporary migration studies due to its unique role as a destination, source and transit country, particularly in the context of the Syrian refugee crisis. The mass migration of Syrians into Turkey, beginning in 2011, marked a turning point in Turkey's migration policy and practices. As the conflict in Syria escalated, Turkey rapidly became the primary destination for millions fleeing violence. As of 4 December 2025, around 2.3 million Syrians are under Temporary Protection (TP) and fewer than 200,000 non-Syrians are under International Protection (IP) within its borders (PMM 2025; UNHCR 2024a).

As the country hosting the largest number of beneficiaries of international or temporary protection globally, predominantly Syrians under Temporary Protection (SuTP) (UNHCR 2024b), Turkey's migration policies and practices provide a rich and complex case for studying the intersections of IP, governance and temporality. The Syrian mass migration has tested Turkey's migration governance structures, pushing the country to adapt and innovate within the framework of its TP regime. Turkey introduced the Temporary Protection Regulation (TPR) in 2014, establishing a unique legal framework designed to manage this unprecedented flow of refugees. This framework provided immediate protection and essential services to Syrians; however, the TPR's inherent temporality also revealed the Turkish government's use of 'temporality' as a key governance tool in managing refugee populations. This temporal governance leaves refugees in a cycle of displacement, emphasising the need for rights-based migration policies. With this background, Turkey emerges as a key site for examining the challenges and opportunities of managing protracted refugee populations under TP, especially in a non-European Union (EU) context. Syrians under TP in Turkey represent a paradigmatic case of how modern states balance humanitarian commitments with national interests. The Turkish government's open-door policy at the initial stage of the mass migration evolved into a more regulated, securitised approach, reflecting the complex interplay between domestic politics, regional stability and international obligations (Gokalp Aras and Şahin Mencütek 2015, 2016, 2020).

In this framework, this paper investigates how temporality and legal stratification operate as deliberate governance tools within Turkey's refugee regime, shaping not only the modalities of protection but also the transition from reception to return. The main research question explicitly asks: In what ways does temporality function as a strategic instrument of refugee governance and how do state institutions use time, waiting and indefinite protection statuses to manage and discipline refugee populations? How does legal stratification institutionalise selective inclusion and control, creating differentiated legal and social hierarchies between SuTP and other non-Syrian groups under international protection? How are these 2 mechanisms (temporality and stratification) interconnected in producing and sustaining a condition of 'governable precarity' that enables the Turkish state to shift flexibly from humanitarian reception to return-oriented policies? In relation to the return dimension, how does this dual mechanism shape the conditions, practices and narratives of return, including the blurred boundaries between voluntary and coerced repatriation?

The paper argues that temporality is a deliberate governance strategy, not merely an administrative condition of protection regimes but a strategic instrument used by the state to manage uncertainty, control refugees' time horizons and maintain policy flexibility. On the other hand, legal stratification institutionalises selective inclusion and control because, through differentiated statuses, Turkey formalises a hierarchy of rights and entitlements. This legal layering reproduces inequality and ensures that protection remains conditional and revocable. Syrians and non-Syrians are subject to distinct legal categories, yet both experience temporariness as a shared condition. Temporality and stratification are

interconnected mechanisms that extend into the domain of return. The same temporal logic that governs reception also structures return. Temporality normalises the expectation of eventual repatriation, while stratification defines who can be returned, when and under what conditions.

While Turkey's stratified regime of protection and return is distinctive in its dual-track architecture, combining TP for Syrians with the IP of non-Syrians, its dynamics are not unique. Similar forms of stratified inclusion and selective recognition can be observed across the Middle East and North Africa (MENA), where states strategically govern migrant and refugee populations in line with geopolitical leverage, security priorities and economic needs. Yet Turkey stands out for how legal stratification and temporality are institutionalised through law, particularly via the geographical limitation to the 1951 Convention Relating to the Status of Refugees (adopted 28 July 1951, entered into force 22 April 1954, 189 UNTS 137) and the TPR (2014) which, together, formalise temporariness and conditionality as the core of refugee governance. This makes Turkey's case a paradigmatic example of how temporality becomes a structural governance tool, embedded in legal design rather than emerging solely from administrative practice or political discourse. For example, in Egypt, migration and refugee management are explicitly stratified, with Syrians accessing relatively greater services while Sub-Saharan Africans remain in precarious conditions (Tsourapas 2019). In Lebanon, stratification takes the form of informalisation and, like Turkey, legal ambiguity, producing systemic precarity through the absence of codified protection with clear safeguards (Carlos 2025; Stel 2021). Taken together, these examples demonstrate that Turkey's approach belongs to a broader regional repertoire of stratified migration governance. However, its codification of temporality and stratification through the geographical limitation and temporary protection regime represents one of the most legally embedded and durable models of managing refugee populations through time, status and uncertainty.

Turkey offers a paradigmatic case for analysing the nexus between strategic temporality and legal stratification in refugee governance. The coexistence of humanitarian admission with a persistent geographical limitation to the 1951 Refugee Convention creates a dual legal architecture that differentiates refugees by nationality and embeds return within the logic of protection. Thus, the Turkish case is both nationally distinctive and globally instructive for understanding temporal governance beyond the EU, especially in a non-EU context.

Turkey's temporary protection (TP) regime has generated extensive scholarly discussion across legal, policy and sociological disciplines. Nuray Ekşi (2012, 2014, 2018) provided the first comprehensive legal assessment of the TPR (2014) and its link to The Law on Foreigners and International Protection (LFIP, Law No. 6458, adopted 4 April 2013, entered into force 11 April 2014, Official Gazette No. 28615), highlighting its group-based, exceptional and discretionary character. Cavidan Soykan (2017) explored the implementation and human rights dimensions of TP, emphasising how broad administrative discretion and ambiguous procedures create legal insecurity and undermine non-refoulement. Meltem İneli-Ciğer (2016, 2018, 2019, 2025) examined Turkey's TP through a comparative lens, situating it *vis-à-vis* the EU Temporary Protection Directive (2001/55/EC) and emphasising Turkey's distinctive lack of temporal limits. Neva Öztürk (2022, 2025) characterised TP as a Janus-faced framework combining humanitarian rhetoric with control, questioning its alignment with international standards. Complementing these doctrinal analyses, İrem Şengül (2022) traced the politicisation of temporariness and its social consequences, arguing that the prolonged temporariness of Syrians under TP normalised uncertainty as a condition of belonging, providing a parallel argument to this article.

While a wide range of studies has examined Turkey's temporary protection regime from legal, humanitarian and policy perspectives, this paper offers a distinct analytical contribution by conceptualising temporality and legal stratification as interconnected governance mechanisms rather

than as isolated features of refugee law. The paper moves beyond those approaches by demonstrating that temporality operates as a deliberate governance strategy, a tool through which the state manages uncertainty, conditions inclusion and normalises return. Likewise, legal stratification is interpreted not merely as inequality in the distribution of rights but as a structured mechanism that institutionalises selective inclusion and maintains governable precarity. The paper shows how these 2 dimensions (temporality and stratification) co-constitute Turkey's refugee regime from reception to return, linking the legal design of protection to the political logic of return. In particular, the research provides a return dimension from a comparative perspective for Syrians and non-Syrians, with multilayered and multidisciplinary analyses. Empirically, the study advances the literature by combining macro-level legal and institutional analysis with meso- and micro-level fieldwork data collected through 2 Horizon projects, enabling a longitudinal and multi-scalar examination of how governance practices evolve.

The article proceeds as follows. The next section outlines the methodology, detailing the multilevel qualitative research design, data collection and analytical strategies. It is followed by the conceptual framework, which examines the concepts of temporary and international protection in Turkey within the broader context of Syrian mass migration, with a focus on how temporality is used as a migration governance tool. It then introduces the TP regime and the related legal framework in Turkey, along with their evolution, followed by a theoretical framework that explores strategic temporality in migration governance. The article then reflects on the findings and implications of temporality, with a special focus on returns, drawing on empirical data gathered by the 2 comprehensive research projects. The article concludes by reflecting on the broader consequences of migration governance.

Methodology

This article draws on both desk research and extensive fieldwork conducted through 2 Horizon research projects.¹ The first project, which spanned from 2017 to 2021, involved an in-depth analysis of the TP regime for SuTP in Turkey, with a particular focus on their reception, settlement and initial stage of integration. The second ongoing project's research, covering the 2023–2026 period, extends this work by examining further implications and shifts in Turkey's approach to return policies. Empirical data were collected (June 2018–March 2019 and December 2023–March 2024) through semi-structured interviews (68 in total) with stakeholders, expert consultations and focus groups, complementing a rigorous review of legal documents, policy frameworks and existing literature on migration governance at the meso level as well as through interviews (30 in total) with migrants and refugees with return experience at the micro level.² This analysis covers the period up to 8 December 2024; subsequent developments are therefore not reflected in the empirical dataset. Following the reported fall of the Bashar al-Assad regime in Syria on that date, host states, including Turkey, immediately shifted official discourse towards return.

This article adopts a qualitative, multilevel methodological approach that combines extensive desk research with fieldwork. The desk-based component constitutes the analytical foundation of the study and was conducted continuously throughout both projects, reflecting the macro-level analysis. It involved a comprehensive review and triangulation of primary and secondary sources, including national and international legal and policy documents, as well as institutional reports and policy papers from state and non-state actors. A wide range of academic literature on migration governance, temporality, stratification and international protection was also traced. On the other hand, empirical data were collected through in-depth interviews, expert consultations and focus groups conducted across 4 Turkish cities (Ankara, Edirne, İstanbul and İzmir) at the meso and micro levels. The interviews

were conducted with policymakers, local officials, practitioners, civil-society representatives and legal experts involved in implementing the TP regime and return policy, as well as with migrants.

The research design adopts a longitudinal, multilevel approach – macro, meso and micro – to analyse Turkey's migration governance along the protection–return continuum. It combines legal and policy analysis with empirical findings to trace the temporal evolution of refugee management and capture actors' perceptions and practices. Triangulation between legal, policy and field data ensures analytical validity and reveals discrepancies between formal frameworks and implementation, highlighting how migration policies have evolved over time.

Conceptual framework: The interplay between temporality and legal stratification in migration governance

The concepts of 'temporality' and 'stratification' serve as a central analytical lens for understanding Turkey's management of protection. In the migration literature on time, temporality is a critical concept for understanding migration governance (Andersson 2014; Biehl 2015; Nassar and Stel 2019). A substantial body of work covers multiple research strands, with central themes revolving around 'temporality' and 'precarity'.

Alice Edwards is one of the foremost legal scholars examining the temporal dimension of refugee protection. Her analysis regarding refugee status and the cessation clause (Edwards 2012) is foundational for understanding how time is embedded in the legal logic of protection. She argues that the cessation clauses of the 1951 Convention, particularly Article 1C(5) and (6) ('ceased circumstances'), do more than mark an administrative endpoint to protection; they institutionalise temporality as a governance device. She argues that these clauses do more than signal the end of status; they institutionalise temporality as a governance tool, enabling states to transform protection into return once they legally recognise a change in conditions. Edwards (2012) shows that temporary protection regimes operate through the same logic, allowing states to fulfil humanitarian duties while retaining sovereignty over time. Temporality thus becomes a strategic legal mechanism, legitimising the withdrawal of protection and the promotion of return under the guise of normalcy. This insight is crucial for the Turkish case, where Article 11 of the Temporary Protection Regulation (TPR 2014) mirrors the 'ceased circumstances' rationale by allowing termination of protection when 'the situation necessitating it ceases to exist', thereby domesticating the same temporal logic identified by Edwards. The Turkish framework thus domesticates the same temporal mechanism that Edwards identifies at the international level.

While Edwards (2012) and Türk, Edwards and Wouters (2017) highlight the protection dimension of temporality, Jean-François Durieux (2015) extends this logic to the return phase, framing voluntary repatriation as the temporal counterpart and ultimate expression of protection. He argues that refugee protection is inherently dynamic, structured by time, movement and institutional design, where temporary safety is always oriented towards a durable solution. Within this legal duality, return becomes not merely a humanitarian act but the intended temporal completion of the protection cycle. By maintaining protection as provisional, states preserve both humanitarian legitimacy and political flexibility, sustaining governance frameworks that naturally evolve toward repatriation. This perspective shifts the analysis from moral evaluations of return ('voluntary' versus 'forced') to its institutional logic, how temporality in law and policy creates the conditions for return to appear legitimate, timely and orderly. In Turkey, this logic is codified in the LFIP (2013) and TPR (2014), where

temporal flexibility enables a seamless and legally defensible shift from temporary protection to return, illustrating strategic temporality as protection that anticipates its own end.

In particular, for Turkey, the scholars discuss Turkey's multilayered migration regime and its legal uncertainty for refugees. Genç (2018) argues that the migration regime creates legal uncertainty, while Üstübcü (2019) focuses on technocratic governance that results in highly differentiated legal statuses for refugees in Turkey, linking the EU externalisation to a technocratic turn in Turkey's migration governance, which manufactures differentiated legal statuses and clearly articulates stratification in law and administration. These categorical hierarchies (TP vs conditional refugee, etc.) serve as instruments for calibrating rights and uncertainty over time. Gokalp Aras and Şahin Mencütek (2015, 2016) highlight the shift in Turkey's response to the refugee crisis, evolving from an *ad hoc* approach to more regulative and restrictive policies over time. Şahin Mencütek, Gokalp Aras, Kaya and Rottman (2023) provide the critical concept of 'strategic temporality', which refers to the intentional use of temporality by state actors to manage, control and ultimately shape the experiences of refugees within a host society. The concept is presented as a central framework for understanding Turkey's response to the Syrian refugee crisis. It is approached as a governance strategy employed to manage and control refugee situations, particularly the Syrian mass migration, through institutional, legal and discursive mechanisms. It highlights how temporal frameworks are strategically used in migration governance to balance political, administrative and social objectives, while profoundly shaping the lives of refugees and the dynamics of migration management. This strategy is characterised by uncertainty, liminality and complexity, which collectively shape the experiences of refugees and the responses of the various actors involved. Within the legal framework, strategic temporality is implemented through TP statuses, which grant limited rights while maintaining legal precarity. The legal precarity experienced by refugees serves as a key component of this governance strategy, ensuring control over their movements and rights.

In parallel, Biehl (2015: 57) introduces the concept of 'protracted uncertainty', which is defined as 'indefinite waiting, limited knowledge, and unpredictable legal status', conditions that characterise the asylum-seeking experience in Turkey. This concept is expanded by Loyd, Ehrkamp and Secor (2018), who argue that this uncertainty serves to demobilise and contain asylum-seekers, normalising it as a bureaucratic necessity and a security measure. Norman (2020) and Stel (2021) also reflect on how temporality governs refugee populations by keeping their legal status precarious, ensuring that refugees remain in legal limbo. Çelik and White (2021) and Öztürk (2022) argue that the regime offers insufficient rights and does not fully comply with international legal standards, thus creating a lack of a rights-based protection system. The precarity experienced by SuTP in Turkey is also explored in numerous studies (Akçapar and Simsek 2018; Baban, Ilcan and Rygiel 2017; Eder and Özkul 2016; Ertorer 2021; Nimer and Rottmann 2022). Özkul's (2022) work during Covid-19 shows how crisis governance intensifies legal precarity and re-asserts status hierarchies; temporal 'exceptions' harden into routine practice, tightening the protection–return hinge.

'Stratification and differential inclusion' further reinforces the temporal experience of beneficiaries of both TP and IP in Turkey. The concept of stratification examines 'differential life chances – who gets what and why – and migration is about improving life chances' (Jasso 2011: 1292). Stratification extends beyond the citizen/non-citizen distinction to differentiate migrants by factors such as wealth, education and ethnicity. The concept of stratification (Joppke 2007; Morris 2002; Sainsbury 2012) helps to explain inequalities among different migrant groups and situates refugee governance within a national citizenship regime. The concept of (civic) stratification is seen as the role of legal status in forging categorical inequalities between groups (Morris 2002).

There are important contributions examining how different migrant groups, including Syrians, are treated and how legal frameworks differentiate between Syrians under TP and other asylum-seekers or migrants (Abdelaaty 2021; Gökalp Aras, Kabadayi, Ozeren and Aydin 2021; Şahin Mencütek *et al.* 2023). This stratification results in varying levels of access to rights and services, such as health care and employment, often reflecting Turkey's foreign-policy interests. Rygiel, Baban and Ilcan (2016) and Akçapar and Simsek (2018) describe how this stratification leaves Syrians in a liminal space where their rights are not fully guaranteed and their future remains uncertain.

For this paper, the concept of 'strategic temporality' is central to understanding Turkey's evolving approach to refugee governance (Şahin Mencütek *et al.* 2023). It refers to state actors' intentional use of temporality to manage, control and ultimately shape refugees' experiences within a host society. This governance tool allows the state to adapt its policies over time, transitioning from an initial period of open reception to a more restrictive phase that emphasises return and repatriation. Şahin Mencütek *et al.* (2023) argue that it works 'through the mechanism of granting uncertain temporal legal status to forcibly displaced Syrians, putting them in *ad hoc* reception arrangements and exposing them to short-term changes in integration measures, exceptions or derogation from norms' (2023: 8).

Legal stratification, in particular, refers to the creation of hierarchical legal statuses that determine access to rights, services and opportunities. This selective inclusion not only limits refugees' ability to achieve stability but also reinforces their temporality, making it clear that their stay in Turkey is conditional and subject to change. By employing a system of legal stratification, the Turkish government maintains control over the refugee population, ensuring that their presence remains manageable and adaptable to the state's shifting priorities. This form of differential inclusion allows the state to exercise power over the refugee experience, dictating the terms of access to rights and services while keeping the possibility of return or repatriation open.

Within Turkish law, legal stratification is formally embedded in the LFIP (Law No. 6458, 2013) and related secondary legislation. Articles 61–63 establish 3 distinct forms of international protection: refugee (limited to Europeans), conditional refugee (non-Europeans until resettled) and subsidiary protection, while Article 91 introduces temporary protection as an additional, group-based category. Thus, it authorises (Article 91) temporary protection for mass influxes (legal basis for Syrians). These layered statuses carry differentiated rights, residence entitlements and access to legal remedies, thereby constructing a legally sanctioned hierarchy of protection. The TPR (2014) further codifies this inequality by granting only limited social and economic rights. Articles 25–38 specify limited rights (health, education, work permits) but exclude permanent residence, family reunification or citizenship pathways. TPR also allows the termination of TP when 'the situation necessitating it ceases to exist', reinforcing temporality and conditionality. It also permits termination when 'the situation necessitating it ceases to exist' (Article 11). Finally, the Regulation on Work Permits for Foreigners under Temporary Protection (2016) grants restricted labour-market access, subject to quotas and provincial approvals, deepening legal inequality between TP-holders and other status groups. Thus, this architecture exemplifies legal stratification by institutionalising the differentiation of refugee groups, mediated by statutory and regulatory provisions that combine temporality with selective inclusion.

Turkey's use of strategic temporality and legal stratification plays a crucial role not only in protection but also in determining the type of return that refugees face. Strategic temporality implies that the presence of refugees in Turkey is provisional and contingent on shifting political goals. By framing their stay as temporary, Turkey retains the flexibility to move from integration to return when it aligns with political or strategic interests. This temporality shapes a policy environment that inherently moves towards return, whether through voluntary means or more coercive strategies. Thus, temporality and

legal stratification are not just mechanisms for managing refugees within Turkey but are also actively employed to make the process of return more feasible and justifiable. The temporality embedded in the legal framework helps to normalise the idea of return as an inevitable outcome, while legal stratification ensures that refugees remain in a vulnerable position and more willing to accept return as a viable option.

Legislative landscape: From protection to return temporality and stratification

Turkey's legal framework for IP is built on a complex combination of primary and secondary laws, creating a system marked by temporality and stratification. Starting from the very first regulatory document in the field of migration (the Law on Settlement, #2510), dating back to 1934, Turkey has developed an intricate set of immigration and asylum laws, resulting in a dual system that restricts the right of asylum and migration to persons with 'Turkish descent and culture' (Article 3). It distinguished the Muslim population living under Ottoman governance across different geographies from non-Turkish-origin populations, as they were not accepted as immigrants. The Settlement Law was Turkey's first comprehensive migration legislation, focusing on the settlement of immigrants in the country and prioritising persons of Turkish descent and culture for settlement and integration. This represented a strong emphasis on the nation-building agenda of the early Republican period, with migration policy serving as a tool for homogenising the population in ethnic and cultural terms. Restrictions on the settlement of non-Muslim and non-Turkish ethnic groups reflect a selective approach to immigration. Turkey is a signatory to the 1951 Refugee Convention and the 1967 Protocol; however, due to its geographic limitations, it has granted refugee status only to individuals fleeing events in Europe. This limitation excluded refugees from non-European countries from gaining formal refugee status in Turkey, leaving them under temporary or *ad hoc* arrangements. This geographical limitation resulted in duality and stratification between European and non-European nationalities, as Turkey recognises refugee status only for those from European countries. In 1994, in response to increasing migration flows, particularly from the Middle East and Asia, Turkey adopted the 1994 Regulation on Asylum (Regulation No. 6169), issued under the Law on the Residence and Travel of Foreigners (Law No. 5683). Under this law, temporary asylum procedures for non-European refugees are established, along with guidelines for the registration and TP of asylum-seekers, often with the expectation of resettlement to a third country. However, limited rights and access to services provided for non-European refugees reinforce the geographical limitation of the 1951 Refugee Convention.

In 2006, the Settlement Law (#5543) replaced the 1934 Settlement Law, maintaining certain elements while introducing modernised policies. However, it continued to prioritise individuals of Turkish descent and cultural ties for migration and settlement, using 'persons of Turkish descent coming' and 'those connected to Turkish culture' (Article 11). Although the update reflects efforts to modernise Turkey's migration policies within the framework of international relations, human-rights standards and changing migration dynamics, it still prioritises certain groups over others. It appears to conflict with principles of equality in migration governance.

In 2013, Turkey's first national migration and asylum law – the Law on Foreigners and International Protection Law (#6458, LFIP, 2013) – was adopted. The LFIP addresses IP issues and the statuses and rights of foreigners.

Complex protection categories and nested dualities

The LFIP (2013) demonstrates a complex, stratified approach to the protection framework, offering varying levels of rights and status to different groups of migrants and refugees under international, temporary and subsidiary protection regimes. The LFIP imposes geographical limitations and introduces additional legal categories that further stratify the already stratified legal system. Due to this geographical limitation, asylum-seekers from non-European countries, including millions of Syrians, fall outside the scope of Convention refugee status and are instead categorised under alternative protection statuses, such as ‘conditional refugee’ or ‘subsidiary protection’ (LFIP 2013). These statuses, introduced through the LFIP in 2013, do not offer long-term integration prospects; instead they restrict rights such as family reunification and allow stays only until resettlement in third countries, which often takes years (AIDA 2019). As part of the primary law, the geographical limitation reflects the dual approach to differential protection for European and non-European asylum-seekers.

The LFIP made the situation even more complicated by introducing 4 legal statuses regarding international protection: ‘refugee’, ‘conditional refugee’, ‘subsidiary protection’ and ‘temporary protection’ (LFIP, Article 61 (1), 62(1), 63(1), Article 91).

Among the different protection types under IP, the ‘refugee’ status is based on Turkey’s obligations under the 1951 Convention and, due to Turkey’s geographic limitations, is granted only to persons from European countries. When we look at the consequences, we see that, since Turkey’s establishment in 1923, only 70 persons from European countries have qualified for refugee status under the 1951 Convention (TBMM 2018: 111). Unlike Syrians and Afghans, Ukrainian nationals fall within Turkey’s geographical limitation to the 1951 Refugee Convention and are thus formally eligible for refugee status under Article 61 of the Law on Foreigners and International Protection (LFIP, Law No. 6458, 2013). However, their small numbers (7,131 registered applicants as of February 2023) mean that they are processed individually rather than under any group-based or temporary-protection regime (UNHCR 2023 cited in Çoban 2024: 79). In practice, most Ukrainians are considered for subsidiary protection (Article 63 LFIP) rather than full refugee recognition, as their displacement results primarily from indiscriminate violence linked to the ongoing armed conflict rather than persecution on Convention grounds. In practice, however, very few have applied for individual recognition, as most Ukrainians enter through visa or residence permit schemes rather than asylum channels. Thus, the refugee clause for Europeans remains symbolic rather than operational.

On the other hand, persons from a non-European country of origin can obtain only ‘conditional refugee’ status and cannot benefit from the refugee rights specified by the 1951 Convention (Article 1A (2)). This status reflects the duality and stratification that comes from differentiated treatment between the 1951 Convention for those originating from ‘non-European’ vs ‘European’ states (AIDA 2019). This status is rooted in Turkey’s geographic limitations under the 1951 Refugee Convention, which restricted formal refugee status to those fleeing events in Europe. A key distinction between refugee and conditional-refugee status is that the latter does not provide a pathway for long-term integration or the right to reunification. Conditional refugees are allowed to stay in Turkey only until they can be resettled in a third country. Thus, this foresees the relocation and resettlement of conditional refugees in safe third countries. Therefore, this stratification also brings temporality for one group – who were granted a temporary status on the condition that they would eventually be resettled in a safe third country – providing protection until they are settled in one, rather than being integrated into Turkish society or allowed to remain permanently.

The third and last IP in Turkey is 'subsidiary protection'. It reflects Turkey's commitment to IP standards as outlined in Article 63 of the LFIP. This protection is granted to individuals who do not qualify for refugee or conditional-refugee status but who face serious threats if returned to their country of origin, such as the death penalty or a serious threat to life due to generalised violence (Article 63). Subsidiary protection status provides certain rights – such as access to healthcare and limited work opportunities – but it does not offer the full rights associated with refugee status.

The above-mentioned 3 protection categories reflect Turkey's reluctance to absorb large numbers of non-European refugees permanently. The categorisation of these individuals as 'persons to be resettled' underscored their transient legal and social status in Turkey, leaving them with limited rights and access to long-term solutions while they waited for resettlement opportunities. The LFIP formalised this practice, officially defining conditional-refugee status and continuing the policy of third-country resettlement for non-European asylum-seekers, thus institutionalising the temporary and transitional framework that had been in place for decades.

The second part of the stratification and temporality is based on 'temporary protection', which is 'provided for foreigners who have been forced to leave their country, cannot return to the country that they have left and have arrived at or crossed the borders of Turkey in a mass refugee movement situation seeking immediate and temporary protection' (LFIP 2013, 91(1)). It is applied on a group basis during mass migration (forced) situations when the large volume of arrivals makes individual assessments not possible for the related authorities. For the mass migration of Syrians since 2011, Turkey implemented a TP regime codified through the TPR (2014). This group-based protection applies to those who have been forced to leave Syria and seek immediate safety but it is inherently temporary, with no specified time limits (LFIP, Article 91; TPR 2014). The Turkish Presidency has the authority to extend or terminate TP, reflecting the strategic flexibility and temporality embedded in this legal framework.

Except for refugee status, the other protection types do not fall under the 1951 Convention and only provide complementary protection. It can be argued that the cessation clauses³ of the 1951 Refugee Convention underscore that the protection granted under the Convention is not an immutable or permanent guarantee. These clauses allow for the termination of refugee status under certain conditions, such as the resolution of the circumstances that led to the individual's displacement. This inherent feature also underscores uncertainty and the fact that refugee status is contingent on evolving circumstances. Therefore, the Convention does not promise absolute certainty or permanence in the legal status of refugees. However, despite this uncertainty, it can be said that protection under the Convention remains significantly more reliable than TP mechanisms. The Convention establishes a binding framework of rights and obligations within international law, including access to legal remedies and safeguards against refoulement. In contrast, TP is limited by its provisional nature and often lacks procedural safeguards comparable to those provided by the Convention. TP is typically subject to the state's decisions and policy changes, which can vary widely in their application and may not guarantee the same level of legal security.

Also, the conditional-refugee status in Turkey exemplifies a temporality framework that is even more restrictive than the cessation clause for refugees under the 1951 Refugee Convention. While cessation clauses reflect international standards for ending refugee status when conditions in the country of origin improve, the conditional-refugee status in Turkey imposes systemic temporality by design, limiting protection to a transitional phase until resettlement in a 'safe third country'. This temporality is structural and legally codified, tying the protection of individuals solely to their resettlement prospects,

which are uncertain and subject to international agreements and political negotiations. As a result, conditional refugees face greater vulnerabilities than those governed by cessation clauses.

The existing national legislation prioritises temporary arrangements over permanent refugee status, leading to a situation in which even those under international or temporary protection experience significant legal and social precarity (Gökalp Aras and Şahin Mencütek 2020; Kaya 2020; Şahin Mencütek *et al.* 2023). This dual structure results in gaps between the legal framework and actual practices, highlighting the strategic use of temporality in Turkey's asylum regime to maintain control over the presence and future of those seeking protection.

The concept of duality in Turkey's migration governance emerges primarily from 2 interconnected layers of differentiation in protection regimes. This duality highlights the structural divisions among groups based on geographical origins and specific nationality-based policies, as outlined in the manuscript. First, the European vs non-European refugees, due to Turkey's retention of the geographical limitation in the 1951 Refugee Convention, creates a legal division. Refugees from European countries can access full refugee status under the Convention, while those from non-European countries – such as Syrians, Afghans and Iraqis – are moved to alternative and more precarious statuses, such as 'conditional refugee' or 'subsidiary protection'. The second is Syrians vs non-Syrians within the category of non-European refugees; a secondary layer of duality emerges, rooted in the distinct treatment of Syrians under the TPR and other non-Syrian populations under the LFIP. The table below summarises Turkey's dual protection regime and highlights its stratified nature.

As Table 1 reflects, stratification characterises Turkey's approach to protection. The LFIP creates multiple tiers of protection statuses, including refugee, conditional refugee, subsidiary protection and TP. Each status comes with different rights and conditions, resulting in a hierarchical structure of protection.

Article 1 of the TPR defines its scope in general terms, referring to 'foreigners who have been forced to leave their country, are unable to return and arrive at or cross Turkish borders in masses for urgent and temporary protection' (Official Gazette No. 29153, 22 October 2014). While the Regulation does not explicitly mention Syrians, in practice it has been applied exclusively to Syrian nationals and stateless persons from Syria since 2014. This *de facto* restriction effectively constitutes a nationally specific implementation of Article 91 of the LFIP (2013). It was influenced by the EU Temporary Protection Directive (EC 2001), which served as a model in its legal framework and operational principles. Turkey has provided TP to Syrians for over a decade, which is different from the EU Directive regarding the duration. The EU Directive sets a 1-year limit, with possible 6-month extensions up to an additional year (Article 4(1)) – and a further extension of up to 1 more year (as per Article 4(2)), so a total possible maximum of 3 years. In contrast, Turkey's legislation, neither the LFIP (Article 91(2)) nor the TPR (Article 10), specifies a time limit. Instead, the authority rests with the Presidency (previously the Council of Ministers until 2018), which determines the duration, conditions for extension and termination of TP (TPR, Article 11(1)).

Table 1. Protection categories in Turkey

Type of protection	International protection (individual-based status determination)			Temporary protection (Syrian + Non-Syrian division) (Group-based status determination)
Geo-scope	European	Non-European		Only Syrians
Legal status	Refugee granted to individuals coming from European countries based on the 1951 Convention	Conditional refugee for asylum-seekers coming from non-European countries. Granted temporarily until resettlement in a third country	Subsidiary protection granted to individuals who do not qualify as refugees or conditional refugees but face serious threats (death penalty, torture or violence)	Temporary protection group-based protection for mass influx situations, currently only for Syrians who arrived directly from Syria after 28 April 2011
Legal source	LFIP, Article 61(1)	LFIP, Article 62(1)	LFIP, Article 63(1)	LFIP, Article 91(1–2) and the temporary protection regulation TPR (2014)
Numbers	Estimated around 70 people (TBMM 2018)	220,000 (UNHCR 2024a)	Estimated around 100 people, but no official data (Gürakar Skribel 2018)	2,366,922 (PMM 2025)
Nationality	No data regarding nationality	The top 3 nationalities are Afghans, Iraqis and Iranians		Only Syrians
LFIP, Article 61(1): A person who, as a result of events occurring in European countries and owing to a well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group or political opinion, is outside the country of his/her citizenship and is unable or, owing to such fear, is unwilling to avail him- or herself of the protection of that country; or who, not having a nationality and being outside the country of former residence as a result of such events, is unable or, owing to such fear, is unwilling to return to it, shall be granted refugee status upon completion of the refugee status determination process.				
LFIP, Article 62(1): A person who, as a result of events occurring outside European countries ...				
LFIP, Article 63(1): A foreigner or a stateless person, who could be qualified neither as a refugee nor as a conditional refugee, shall nevertheless be granted subsidiary protection upon the status determination because, if returned to the country of origin or to the country of [former] habitual residence ...				
LFIP, Article 91(1): Temporary protection may be provided for foreigners who have been forced to leave their country, cannot return to the country that they have left and have arrived at or crossed the borders of Turkey in a mass influx situation seeking immediate and temporary protection. (2) The actions to be carried out for the reception of such foreigners into Turkey; their stay in Turkey and rights and obligations; their exit from Turkey; measures to be taken to prevent mass influxes; cooperation and coordination among national and international institutions and organisations; determination of the duties and mandate of the central and provincial institutions and organisations shall be stipulated in a Directive to be issued by the Council of Ministers.				

Source: Updated and modified by the author and expanded based on Şahin Mencütek *et al.* (2023).

Additionally, the Presidency can restrict or suspend TP when national security, public order or health are at risk (TPR, 2014 Article 15). In particular, this aspect establishes a connection between temporality and the return policy, granting the Turkish Presidency the right to terminate TP if it deems the conditions in Syria to be safe or if an agreement is reached with Syria on the grounds that the circumstances necessitating temporary protection have ceased to exist. This status is left without a fixed time frame, enabling the Presidency to make adjustments or terminate it as political or security considerations evolve. This flexibility allows Turkey to adapt its protection policies over time, using the temporary status to manage the mass refugee movement and then gradually shift towards return policies if circumstances change. On the other hand, for IP, Article 86 of the LFIP has the relevant provisions regarding the grounds for cancellation of this status, which are the usage of false documents, deception or concealing essential facts (Article 86(a)); Article 86(b) allows for the cancellation of international protection if it is discovered that the individual falls under the exclusion clauses in Article 64. These clauses exclude individuals who committed crimes against humanity or serious non-political crimes (e.g., terrorism) or who threaten Turkey's national security or public order. The PMM makes the decision and individuals can appeal through legal channels. This ensures that protection is not granted to those who pose a risk to security or peace.

Return and temporary and international protection

The literature provides insights into the general legal framework and its temporal and stratified character; however, this paper extends its analysis to the understudied return. The existing differentiation in international protection (including TP) creates a stratified system in which Syrians receive a specific status with associated return procedures.

The TPR establishes the legal framework for their protection status and provides specific procedural safeguards, including the prohibition of *refoulement* (forced return) as outlined in Article 4 of the TPR. The return process for Syrians is more centralised than that for IP beneficiaries in Turkey under the PMM, which coordinates with the UNHCR and other entities to ensure compliance with voluntary return protocols. The voluntary return of Syrians is managed under TPR Article 42, which specifies that those wishing to return voluntarily to Syria must complete a 'Voluntary Return Request Form'. This process must be conducted under the supervision of international organisations or relevant Turkish authorities to ensure that returns are genuinely voluntary. This oversight aims to ensure that Syrians' return to Syria occurs without coercion – and the legal system has an emphasis on voluntary returns. For Syrians, the TP status under the TPR provides a tailored framework, particularly concerning return conditions. The Turkish authorities emphasise returns to designated 'safe zones' in northern Syria. The TPR allows the Turkish authorities to emphasise the voluntary nature of return while retaining the power to suspend or terminate the protection status if certain conditions are met (TPR, Articles 11 and 15). This flexibility enables a shift in the approach to returns as political and social contexts change, particularly amid challenges such as the 2023 earthquake, which affected both Turkey and Syria. By maintaining this sense of temporality, Turkey effectively manages expectations among Syrians that their stay is conditional and reversible. This approach creates a psychological and social environment in which Syrians are less likely to view Turkey as a place of long-term settlement, making them more receptive to the idea of return when political or economic conditions change. It reinforces the notion that Turkey's role is as a temporary refuge rather than a permanent resettlement destination, thereby laying the groundwork for future return policies.

Temporality is used to justify and legitimise policies that encourage voluntary return. For example, the framing of Syrians as ‘guests’ who are staying temporarily has been used to promote the idea that they should return once conditions in Syria are deemed safe or when Turkey’s political or economic circumstances change (Baban *et al.* 2017). This narrative makes it easier for the state to implement programmes or initiatives that encourage return, as the temporary nature of protection makes return a logical outcome. The temporality of protection for Syrians implies that access to rights and services is conditional, thus reinforcing the idea that these privileges are granted temporarily. This conditionality makes it easier for the state to withdraw or limit access to health care, employment or education if the political objective shifts toward encouraging return. By keeping rights and protections as fluid, the state creates an environment where return becomes a more attractive or even necessary option for Syrians who face increasing restrictions. Turkish policymakers frequently emphasise the temporary nature of Syrians’ stay, reinforcing the idea that their ultimate destination is back in Syria. This rhetoric supports the state’s efforts to implement return policies by framing them as part of a broader, long-term plan to facilitate the repatriation of Syrians when the conditions are right.

On the other hand, the return process for non-Syrians, including those under conditional-refugee status or subsidiary protection, is governed by LFIP Articles 52–60, which outline the procedures for both voluntary and forced returns, emphasising the need for individual assessments to ensure that returns do not violate the principle of non-refoulement. This law governs the procedures for return, deportation and IP applications. Non-Syrians who violate visa regulations, pose a risk to public order or security or engage in activities such as using false documents, may face deportation, as outlined in Article 54 of the LFIP. The LFIP also provides for challenges to deportation decisions and allows for judicial review. Specifically, Article 53 of the LFIP provides that deportation decisions can be appealed to the administrative courts within 7 days. This right of appeal offers a legal safeguard that can temporarily suspend deportation until the court issues a final decision.

In Turkey, Syrians under TP do not have the same access to appeals as individuals under IP, highlighting a significant procedural disparity between the 2 systems. For individuals under IP, the appeals process is well-defined and involves multiple layers. If an applicant receives a negative decision regarding their status, they can file an administrative appeal within 10 days through the International Protection Evaluation Commission (IPEC). Additionally, they have the right to bring their case to the Administrative Court within 30 days. If the Court upholds the rejection, applicants may escalate the appeal to the District Administrative Court and, if necessary, file an individual complaint with the Constitutional Court. Importantly, these appeals have the effect that applicants generally have the right to remain in Turkey until a final decision is reached.

Furthermore, under the LFIP, individuals under IP have access to free legal aid to support them during the appeal process. In contrast, Syrians under TP do not benefit from procedural safeguards. TP is granted on a group basis, meaning Syrians are not subjected to individual status determination. As a result, they lack any clear legal grounds to challenge their status. Decisions regarding their protection, including their termination, are made administratively by the Presidency and there is no structured judicial appeals mechanism. This absence of appeal options reinforces the temporary and precarious nature of their status, leaving Syrians with significantly less legal recourse compared to those under IP.

For non-Syrians, the LFIP introduced a voluntary return provision under Article 60/A, which provides in-kind or in-cash support to those who opt for it. This process is often implemented through cooperation with international organisations, such as the International Organisation for Migration (IOM), as part of the Assisted Voluntary Return and Reintegration (AVRR) programme. Turkey also has a national AVRR (N-AVRR) programme in collaboration with the International Centre for Migration

Policy Development (ICMPD). However, this framework lacks the same level of monitoring and formalisation as the TPR for Syrians. The administrative discretion significantly determines who qualifies for these programmes and who faces deportation. The criteria for assessing eligibility and the safety of return countries often vary, adding to the uncertainty and temporality of protection. It is a fact that non-Syrians subject to deportation face individual assessments under the LFIP, which requires decisions to align with the principle of non-refoulement as outlined in LFIP Article 4. Voluntary return programmes are often coordinated with the IOM. However, non-Syrians can be forcibly returned if they are deemed to be a threat to public order, as stipulated in LFIP Article 54(1).

The return regime under the TPR and the LFIP differs significantly in both its procedural safeguards and the degree of protection provided. While Article 6 of the TPR guarantees the principle of non-refoulement, ensuring that individuals under TP cannot be forcibly returned to unsafe conditions, the safeguards around returns are comparatively limited and lack robust procedural guarantees. Unlike IP beneficiaries, Syrians under TP are subject to centralised, highly discretionary administrative decisions, particularly after the 2018 reform of the presidential system. Additionally, under TPR Article 15, TP can be suspended or terminated for risks to national security, public order or health, creating significant legal uncertainty. The cessation of protection is not necessarily tied to an individualised assessment and, while general accountability measures under Turkish administrative law apply, dedicated legal remedies to challenge return decisions are not provided within the TPR.

However, the return regime under the LFIP, at least on paper, ensures individual assessment and access to appeals, as applicants can appeal removal decisions through administrative and judicial channels, including the Administrative Court and, potentially, the Constitutional Court. These remedies are clearly outlined in the LFIP. Appeals generally have a suspensive effect, allowing individuals to remain in Turkey until a final decision is reached. Under the LFIP, individuals granted international protection (e.g., subsidiary protection or conditional-refugee status) are safeguarded from deportation to conditions where they face persecution, torture or other forms of harm, as outlined in Article 63.

Non-Syrians' return involves the broader application of the LFIP across various levels of local and national authorities. This includes decisions by the Provincial Directorates of Migration Management (PDMM) and general law enforcement units, as outlined in Article 53 of the LFIP. While these processes ensure legal support, they lack the specific mechanisms and international oversight seen with Syrian returns.

The principle of non-refoulement is a cornerstone of both the TPR and the LFIP. Article 4 of the LFIP and Article 4 of the TPR prohibit the return of any individual to a country where they might face threats to life, torture or inhumane treatment. Article 4 of the LFIP (Law No. 6458, 2013) codifies the principle of non-refoulement, stipulating that 'No one shall be returned to a place where they will be subjected to torture, inhuman or degrading punishment or treatment or where their life or freedom would be threatened on account of race, religion, nationality, membership of a particular social group or political opinion'. This provision mirrors Article 33(1) of the 1951 Refugee Convention and Article 3 of the European Convention on Human Rights (ECHR), thereby incorporating the international norms directly into Turkish domestic law. However, scholars note that the application of Article 4 often diverges in practice. İneli-Ciğer (2018) shows that procedural safeguards remain weak and administrative discretion broad, particularly in cases involving Syrians under Temporary Protection. Although Syrians formally benefit from Article 6 of the TPR, which repeats the non-refoulement obligation, numerous reports highlight *de facto* violations through coerced 'voluntary' returns or returns to so-called 'safe zones' (HRW 2022; UNHCR 2023). In this sense, the non-refoulement principle functions as both a legal safeguard and a governance instrument, setting the normative boundary of return while being

strategically interpreted to legitimise differentiated practices between Syrians and non-Syrians. Its flexible application illustrates how Turkey's regime reconciles formal compliance with international law and the political drive toward return.

However, while these protections apply generally, their implementation varies depending on the individual's status. For Syrians, the TP status under the TPR provides a tailored framework, particularly concerning return conditions. The Turkish authorities emphasise returns to designated 'safe zones' in northern Syria despite ongoing debates about the safety and voluntariness of such returns. For non-Syrians, Article 55 of the LFIP restricts deportation if the individual faces a threat of persecution in the destination country. This provision applies during the initial deportation decision and any subsequent appeals. However, the safeguards provided in the LFIP are often interpreted more strictly, with a focus on national security concerns.

Briefly, the return regime under the TPR is less protective than that under the LFIP due to significant differences in procedural safeguards and legal frameworks.⁴ Under the LFIP, non-Syrians benefit from individualised assessments and multilayered appeals, ensuring stronger adherence to the non-refoulement principle (Article 4). For example, if a deportation or return decision is issued as a result of an individual assessment (Article 52), IP applicants have the right to appeal (Article 53) and to legal aid. In contrast, Syrians under the TPR⁵ are subject to a group-based approach to protection. While the principle of non-refoulement is guaranteed under Article 6 of the TPR, Syrians face more precarious conditions regarding return. Because Syrians lack an individualised protection determination process, their status is automatically granted under TP. In addition, appeals against decisions such as removal orders or the termination of TP are far more limited and are primarily administrative rather than judicial, offering weaker safeguards. The discretion of state authorities to terminate TP status, particularly for reasons related to public order or national security, further undermines Syrians' protection against return.

In contrast, the TPR's group-based approach for Syrians lacks individualised assessments and appeal mechanisms are limited to administrative procedures, offering weaker protections against forced returns. Moreover, the TPR allows the termination of protection for public-order reasons without robust procedural safeguards, creating heightened legal uncertainty. While both frameworks emphasise returns, the LFIP includes clearer procedural safeguards, often supported by international organisations, thereby reducing the risk of coercion. Ultimately, the TPR's return regime reflects a less protective approach, prioritising temporality and facilitating returns over durable solutions. Thus, the return regime under the LFIP provides stronger procedural safeguards for non-Syrians, including individual assessments, access to appeals and legal remedies, which are absent or limited for Syrians under the TPR. As a result, non-Syrians enjoy greater protection against return compared to Syrians, reflecting the stratified and hierarchical nature of Turkey's asylum and protection framework.

The legal frameworks for both Syrians and non-Syrians highlight the role of administrative discretion in interpreting and applying the law. For example, the Presidency's authority to determine the duration and conditions of TP (TPR, Article 11) or to terminate it entirely underscores the status' temporary and flexible nature. Similarly, the decision-making process for the deportations or voluntary returns of non-Syrians is often shaped by interpretations of risks to public order or security (LFIP, Article 54). Legal gaps, such as the lack of detailed criteria for what constitutes a voluntary return or for designating safe third countries, create inconsistencies in implementation. These gaps result in practical divergences between the legal framework and the actual experiences of those seeking protection, leading to a highly stratified and temporal system.

In summary, Turkey's legal framework for returns relies on a dual structure of stratification and temporality, as established by the LFIP (2013) and the TPR (2014). The legal framework governing the return of Syrians under the TPR emphasises voluntary return, with substantial international oversight to ensure compliance with non-refoulement principles. The LFIP governs the return procedures for non-Syrians, providing a more general legal structure for deportation but with fewer safeguards for voluntary return. These differences emphasise the distinct legal and procedural pathways for managing returns based on the legal status of the individuals involved and allow Turkey to adapt its return policies to changing political contexts, prioritising temporary solutions over permanent integration.

Before continuing with the findings, the legal distinction between return, deportation and cessation in Turkey needs clarification, as the Turkish migration and asylum framework draws important distinctions between voluntary return, deportation, cessation and exclusion from protection. However, in practice, these categories often overlap. A central legal foundation for understanding the governance of return in Turkey is the principle of non-refoulement, which prohibits the expulsion or return of individuals to territories where they would face persecution, torture or inhuman treatment. This principle is codified in Article 4 of the LFIP (2013). Article 4 reflects Article 33(1) of the 1951 Refugee Convention and is consistent with Article 3 of the ECHR, both of which Turkey is bound by. Under Turkish law, non-refoulement is considered an absolute, directly applicable norm that limits administrative discretion in deportation and return procedures.

Under the *LFIP (2014)*, *voluntary return* is regulated under Article 52 and refers to the return of foreigners who 'decide to leave Turkey of their own will'. However, the findings, particularly those from the second fieldwork period, reflect the absence of procedural safeguards and limited oversight of consent, rendering the voluntariness of such returns highly questionable. *Deportation* (Articles 53–60 LFIP) concerns administrative removal on grounds such as public order or irregular stay, with legal remedies available through the *administrative courts* within 7 days (Article 53/3). In practice, access to these remedies is impeded by short appeal deadlines, language barriers and the lack of suspensive effect. The *cessation* of international or temporary protection (Article 85 LFIP and Article 11 TPR) occurs when 'the circumstances that gave rise to the protection cease to exist'. As Edwards (2012) and Durieux (2015) explain, cessation clauses legally embody the temporal dimension of protection, allowing states to shift from protection to return once they determine that conditions have changed. *Exclusion clauses* (Article 64 LFIP), on the other hand, remove individuals from eligibility for safety due to crimes or security threats and should not be confused with cessation. The *principle of non-refoulement* (Article 4 of the LFIP) applies to all categories. Yet its implementation has been challenged before the European Court of Human Rights, most notably in *Akkad vs Turkey* (Application No. 14859/19, Judgment of 22 February 2022), where the Court held that the deportation of a Syrian national without effective access to an appeal violated Articles 3 and 13 of the ECHR. This jurisprudence reinforces the empirical findings of this study: the boundary between *voluntary* and *forced* return is blurred by the direct and indirect effects of law and administrative practice – and refugees' access to legal remedies remains constrained by procedural and institutional barriers.

Finally, while voluntary return remains the central policy orientation, the citizenship question must also be addressed as part of durable solutions. After more than a decade of residence, the persistence of temporary protection has sparked debate over whether some Syrians may transition to more durable legal statuses or to eventual naturalisation. Under the Turkish Citizenship Act (Law No. 5901, 2009), Syrians may acquire citizenship only through exceptional naturalisation, a discretionary pathway governed by Article 12. According to Tarman (2023), the Turkish legal framework formally permits citizenship acquisition by persons under temporary protection; however, such cases depend on

administrative discretion and political priorities rather than transparent criteria. Canyaş (2023) further argues that long-term residence and integration may eventually pressure the state to provide either permanent residence or selective naturalisation as more sustainable solutions. Recent data analysed by Şahin Mencütek and Barthoma (2025) confirm that, between 2016 and 2024, over 230,000 Syrians were naturalised under an ‘exceptional citizenship’ scheme that operates through selective invitations, opaque eligibility criteria and fast-track procedures. While this policy marks a partial shift from pure temporality toward selective permanence, it remains highly politicised and contested. Taken together, these trajectories illustrate how temporary protection, durable status and return coexist as interdependent governance strategies, each used to balance humanitarian commitments, demographic control and domestic political considerations.

Reflections from the 2 fieldwork periods: Implications of temporality

In line with this legal framework, the empirical findings of this study show how *temporality and stratification* are operationalised through these legal categories: *voluntary return* often merges with *administrative removal* and the practical inaccessibility of legal remedies renders ostensibly voluntary processes coercive. Thus, the distinction between protection and return, formal in law, becomes fluid in practice.

The fieldwork results from 2 Horizon projects, conducted by the author in Ankara, Edirne, İstanbul and İzmir at the meso and micro levels, highlight Turkey’s approach to protection, including both temporary and international protection, with a division between Syrians and non-Syrians and emphasising temporality and stratification. This approach is evident both in the legal framework and in practice and illustrates a hierarchical structure in Turkey’s policies for protection and return. As a part of the first research project and its fieldwork, 33 meso-level (Ankara and İzmir) and 23 micro-level (İzmir) interviews were conducted. The second period of fieldwork yielded 35 meso-level (Ankara, Edirne, İstanbul and İzmir) and 7 micro-level (İzmir) interviews. Among the micro-level interviews, 15 were conducted with Syrians and 15 with non-Syrians.

Overall, the findings show that strategic uses of temporality and stratification shape Turkey’s legal framework for protection and return. The differentiation between Syrians and non-Syrians leads to distinct legal and social realities for each group, affecting their access to services, stability of status and future pathways; however, this paper mainly focuses on the implications concerning the return dimension. The 2 fieldwork periods provide a critical examination of the consequences of temporality within Turkey’s refugee governance framework, particularly under TP regimes.

The governance of protection regimes in Turkey reveals a complex interplay of stratification and strategic temporality, which together shape the lived experiences and outcomes of different groups of migrants and refugees. This stratified structure creates disparities in access to protection and services and to the pathways available for return or integration.

The respondents highlighted that this differentiation is legal and practical, affecting how Syrians and non-Syrians access services. Their testimonies highlight how the stratified system creates varying degrees of insecurity and legal precarity among refugees, influencing their sense of belonging and stability in Turkey. The following quotations from the 2 national NGOs reflect the stratification between the protection categories and TP’s relatively advanced position compared to IP.

As noted by an NGO representative:

International and temporary protections need to be handled differently. The general perception is seeing all refugees as Syrians, which is wrong. At the moment, perhaps 350,000–360,000 people are under international protection and they are non-Syrians. It is wrong to ignore them or create such a hierarchy among refugees, to create categories such as acceptable or unacceptable refugees (15 August 2018, Izmir).

Shared precarity through temporality

The research showed that, despite this stratification by nationality, the common denominator for both TP and IP beneficiaries is their shared experience of precarity stemming from temporality. An overreliance on temporary frameworks risks normalising unstable and insecure living conditions for refugees, undermining international standards of protection. Thus, the normalisation of precarity is an important implication. The research reveals that strategic temporality is a core feature of Turkey's approach to managing displaced populations, particularly in the context of SuTP but also for non-Syrians. Despite some salient differences between the 2 protection statuses afforded by Turkey (TP for Syrians and IP for non-Syrians), both are marked by a temporality and stratification that preserve Turkey's flexibility in migration governance but leave those subjects to these regimes in uncertainty and instability.

Refugees, especially SuTP, often find themselves in a state of legal and social liminality. The respondents frequently cited their critiques of the temporary protection and its 'temporality' as underlying the tension between international standards for durable solutions and Turkey's pragmatic, transient approach. A lawyer described the incoherence of the system, questioning, 'How is it temporary protection when people are here for 7 years?' (12 July 2018, İzmir).

Another NGO representative and a lawyer from the field summarised the precarity and, in 2018, projected the current situation after 8 December 2024 as follows:

Even if temporary protection status is given, the provisional Article 1 of the TPR states that international protection application procedures will not be processed during the time that Syrians are granted temporary protection status. This article is a violation of human rights, the right to asylum and the law. Because there is temporary protection that has been in place for 5 years and this can be revoked by a decision of the Council of Ministers [now this role belongs to the Presidency]. So, I wonder what will happen when the Syrians are told that they can return (15 August 2018, Izmir).

Non-Syrians under IP are required to pursue resettlement in a safe third country, which often results in prolonged waiting periods with uncertain outcomes. As noted by an NGO representative, temporality is valid for both TP and IP:

The principle of temporality is valid for both Syrians and non-Syrians because it is embedded in the legal frameworks, leaving both groups in states of liminality and precarity. One of them is clear; it is temporary protection and the other one is hidden. Because it says you can stay in Turkey until you are resettled, I am not giving you the refugee rights (18 January 2024, Izmir).

Particular emphasis was placed on the challenges which Afghans face in applying for IP and in being resettled to a safe third country. Afghans fall outside the geographical limitation but within the non-European categories eligible for conditional refugee or subsidiary protection under Articles 62–63 of

the LFIP. In practice, however, the adjudication of their claims has been largely suspended or channelled through pre-removal centres due to political and administrative priorities that favour deterrence and return. The fieldwork showed that they have limited access to legal assistance and that accelerated procedures and increased bilateral readmission cooperation with Afghanistan have produced widespread irregularisation and forced returns despite formal eligibility for protection (HRW 2022). This explains why Afghans experience a higher degree of precarity: the gap between the law's potential entitlements and restrictive implementation is widest in their case. During the interviews with the meso-level actors, they were identified as the most disadvantaged group among non-Syrians. Following the Taliban's takeover of Afghanistan in 2021, the process for IP applications became even more problematic. Interviews highlighted their treatment as irregular migrants and the pushbacks targeting this population at the eastern border. An NGO representative from Izmir stated that:

A few hours ago, an Afghan counselee called. They have been in Turkey as a family for 12 years and are waiting for resettlement. She wants a permanent solution. She asked, 'Why aren't we seen as human? Don't we have human rights? Nobody pays attention to or cares for us' (15 August 2018, Izmir).

Similarly, 38-year-old Yusuf from Sudan described being in a limbo situation:

I have been here for 16 years now, waiting. I still have a case file at the United Nations; I am under international protection. Neither going, staying nor returning is an option. After being here for 16 years, they can still deport me. I am black and it is not possible for me to hide (20 January 2024, Izmir).

As can be seen, the temporary nature of TP for Syrians and the transitional framework of IP for non-Syrians ensure that protection is provisional. Both groups face uncertainty that discourages long-term settlement and favours policies placing return over integration.

Stratified protection regimes shape return processes

The fieldwork showed that Turkey's migration governance is characterised by a stratified protection regime, in which different groups and this stratification directly influence the nature of their return processes. Based on the research, the following return types are observed for the provided protection types.

- Syrians under TP: Framed within a group-based protection model, their returns are heavily tied to Turkey's geopolitical goals and policies, such as the creation of 'safe zones' in northern Syria. These are often termed voluntary returns but economic hardships, social exclusion and indirect coercion blur the line between voluntary and forced.
- Non-Syrians under IP: Governed by individualised assessments, non-Syrians, in particular Afghans, face returns often categorised as forced deportations or pushbacks, with fewer procedural safeguards. Their lack of inclusion in Turkey's broader humanitarian rhetoric places them at higher risk of expedited removal without ensuring their safety upon return.

Syrians benefit from group protection, making them eligible for structured return programmes often framed as voluntary. However, the coercive conditions of administrative detention, limited rights and socio-economic constraints make these returns quasi-voluntary at best. The pathways to durable solutions are stratified and limited by temporality. For Syrians under TP, local integration is not formally

recognised as a viable solution and their legal status does not provide a pathway to permanent residency or citizenship. A lawyer highlighted, 'Syrians are not allowed to integrate fully and the only durable solution being promoted is return' (21 January 2024, Izmir).

In contrast, non-Syrians under IP theoretically have access to resettlement. However, in practice, they face significant delays and many live in uncertainty for years. Non-Syrians under conditional-refugee or subsidiary protection experience less-structured processes. Returns often take the form of deportations or removals under less-formalised conditions, with significant risks of human-rights violations. An Afghan respondent remarked, 'We wait and wait for resettlement but nothing happens. It feels like we are forgotten' (22 January 2024, Izmir).

Regarding returns, Syrians are encouraged to return to 'safe zones' in northern Syria but field data indicate that coercive factors often influence these returns. According to my field interviews, Syrians subject to administrative detention or 'voluntary-return' procedures were the most frequently transferred to removal centres in Hatay, Kilis, Şanlıurfa and Gaziantep, before being returned to border gates such as Bab al-Hawa and Jarablus in northern Syria. Lawyers and NGO representatives I interviewed noted that these returns were concentrated towards the so-called 'safe zones' under Turkish control, including Afrin and Azaz, where the monitoring of post-return conditions remains limited. These findings illustrate how the implementation of return policies spatially reflects Turkey's strategic temporality: Syrians' mobility is channelled from urban reception areas toward securitised border zones, operationalising temporariness through controlled geographic relocation.

Despite that, returns are often framed as 'voluntary'; the fieldwork reveals significant coercion due to deteriorating living conditions and restricted rights in Turkey, as the following statement from a legal practitioner summarises:

Two main issues emerge. The first is on the ground – voluntary returns are closely intertwined with deportations. We see that voluntary return forms are present but the actual process often resembles deportation. In many cases, deportations are disguised as voluntary returns. As such, we cannot trust these statistics, as we cannot determine how many of those who left were deported versus those who voluntarily returned. For example, we have seen the implementation of systematic return policies in 2022. In the earthquake-affected regions, individuals forced to leave their homes were placed in camps. Upon reviewing the procedures, we found that residents of these camps were presented with 3 options under an unpublished regulation. First: return to Syria and receive 14,000 TL in assistance; second, move to prefabricated homes built by Turkey in 'safe' zones in Syria but forget 14,000 TL assistance; or, third, leave the current province for another in Turkey but without the right to register in the new location (19 January 2024, Istanbul).

On the other hand, an NGO representative's statement reflected the potential consequences of the recent developments after 8 December in Syria and its impact as follows:

We see cases where individuals are granted status 1 week and recalled the next, with the justification that 'the situation in the country of origin has changed'. The future of temporary protection is something we do not discuss much but we will probably discuss it extensively in the near future. It looks pretty likely that it will suddenly be abolished overnight. Ultimately, there is a clear policy aimed at significantly reducing the population under protection and completely dismantling the protection framework (19 January 2024, Istanbul).

For non-Syrians, as reflected by the interviews, many of them face immediate deportations or pushbacks, often without due process. Their irregular status and lack of access to meaningful legal protections expose them to higher risks of forced returns. For Afghans, in particular, the lack of a robust protection framework results in a precarious existence, leaving little room to contest their return despite the unsafe conditions in their countries of origin. The following 2 quotations from legal practitioners highlight problems with administrative detention conditions and with voluntary vs forced returns.

During voluntary return processes, as we observe from clients and consultees in the field, many individuals are forced into returning after the unbearable conditions of administrative detention. For example, one of my Iranian gay clients held at the X removal centre was transferred to X after we filed a complaint about the detention conditions. During the 10–15 days he spent there, despite the lack of a realistic chance of returning to Iran, he began expressing a willingness to consider a voluntary return. He stated that this was due to the living conditions, hygiene issues, lack of access to international protection and the psychological impact of the actions other detainees were subjected to. For example, at X Removal Centre, 3 individuals recently opted for voluntary return due to these conditions (19 January 2024, Istanbul).

We can mention the issue of forcing voluntary return through administrative detention. This includes treatments bordering on torture, typically occurring in storage rooms or toilets. Even after the process ends and the deportation decision is cancelled, many individuals choose to return because they believe they won't have access to international protection. Simultaneously, their access to justice is severely restricted. Other issues include being deported within the 7-day legal period for filing an appeal, effectively preventing access to this right. Also, even if a case is filed within the legal timeframe, the individual is sometimes unlawfully deported regardless (19 January 2024, Istanbul).

Pushback practices are reported to be increasing, particularly along Turkey's borders with countries like Iran and Greece. Meso-level actors highlight the challenges in distinguishing between officially recorded returns and unrecorded pushbacks, which often happen without due process – particularly affecting vulnerable groups like families with children and unaccompanied minors. For the pushbacks, in particular, Afghans and the other nationalities entering from the western borders were addressed, thus mainly non-Syrians. These latter, particularly Afghans, face a more precarious situation, with reports of forced deportations and pushbacks at Turkey's borders. One Afghan respondent highlighted, 'We were pushed back without any opportunity to explain our situation or enter. It was not voluntary at all but we could not apply also for being refugees' (17 January 2024, Izmir).

As can be seen, both groups face temporality as a governance tool, restricting their ability to plan for the future or to resist returns. Limited access to stable employment and social services increases their dependency and makes them more susceptible to return pressures. Neither group has clear legal pathways to permanent protection or naturalisation in Turkey. Significant similarities and differences become visible in the light of the fieldwork.

Shared experiences

- Legal Insecurity: Both groups are subject to temporality as a governance tool, limiting their ability to plan for the future or challenge return decisions effectively.
- Socio-Economic Vulnerability: Limited access to stable employment and social services exacerbates the dependence of both Syrians and non-Syrians on state policies, making them more susceptible to coercive pressures.
- Lack of Pathways: Neither Syrians nor non-Syrians are offered clear legal pathways toward permanent protection or naturalisation in Turkey.

The two statements from a lawyer and an NGO representative summarise their similarities as follows:

Those people are living in limbo; their future is left in doubt. If the Council of Ministers [now the Presidency] decides to end temporary protection, ok, we accepted you but now it is time to turn to Syria. There is no chance to change the temporary protection status to international protection. If they transfer Syrians to international protection, what will happen? It is the same. After 15 years, people who have been living in Turkey with international protection. They cannot be sent back; they cannot be resettled (15 August 2018, Izmir).

Differences in treatment

- Legal Protections: Syrians under TP have stronger safeguards, including protection against forced deportation and access to basic services. Non-Syrians, however, are often categorised as irregular migrants with minimal protection.
- Return Mechanisms: Syrians are subject to structured 'voluntary' return programmes with international oversight, while non-Syrians frequently face direct deportations or pushbacks without procedural fairness.

Discussions and conclusion

This study highlights the critical role of strategic temporality and legal stratification in shaping Turkey's approach to refugee governance for the selected time period. Through an evolving policy landscape, the Turkish state has used temporality as a governance strategy to manage and control the mass movement of SuTP and other displaced populations. Turkey's migration governance, deeply rooted in the dual mechanisms of strategic temporality and legal stratification, reveals a complex interplay between short-term humanitarian objectives and long-term political strategies. This system, while initially responsive to the unprecedented mass movement of SuTP and other displaced populations, has evolved into a structured, albeit precarious, framework emphasising temporality and conditionality. By design, it discourages permanent integration and instead privileges return as the ultimate policy goal. By maintaining the temporary nature of protection statuses, particularly under the TPR, Turkey has been able to adapt its policies according to shifting political and economic contexts, moving from initial reception towards a focus on return and repatriation.

The findings emphasise how temporality serves not merely as a feature of the legal framework but as a deliberate tool that creates a state of protracted uncertainty for refugees. This temporality constrains refugees' ability to integrate into Turkish society, leaving them in a state of liminality, where

their presence remains contingent and their future uncertain. This strategic use of temporality enables the Turkish state to balance international obligations with domestic political considerations, thereby shaping a dynamic yet unpredictable refugee management system. While this governance model allows Turkey to adjust its policies in response to changing national and regional dynamics, it also perpetuates uncertainty and legal precarity for those seeking refuge. Addressing the humanitarian and legal gaps in this system requires a shift towards more-consistent and rights-based approaches that recognise the long-term presence of refugees and support their integration into society.

As this paper demonstrates, Turkey's strategic use of temporality and legal stratification not only governs the conditions of protection but also serves as a pivotal tool in shaping return policies. While temporality creates a narrative of provisional refuge, stratification differentiates access to rights and resources, leaving refugees in a state of perpetual precarity. These dynamics disproportionately affect different groups – Syrians under TP and non-Syrians under IP – underscoring the need for a rights-based approach that prioritises safety, dignity and sustainability in return policies. Recent developments in Syria, including the transformative political changes following Assad's departure, highlight the interconnected nature of refugee return policies and geopolitical dynamics. The surge in voluntary returns to Syria after 8 December 2024 illustrates how evolving political realities in origin countries can influence return trends.

Future research should focus on the lived experiences of returnees, the rebuilding of social and physical infrastructure and the legal and administrative barriers that persist in both host and origin contexts. Ultimately, Turkey's approach reflects broader global trends in migration governance, where temporality and stratification are strategically deployed to balance national interests with international obligations. However, the long-term viability of these strategies requires a shift towards more inclusive, sustainable and rights-based policies that recognise refugees as active agents in shaping their futures rather than as passive subjects of state-led migration control.

Notes

1. *RESPOND: Multilevel Governance of Mass Migration in Europe and Beyond Project* (Horizon2020, #101094341) <https://www.respondmigration.com>; *GAPs: De-Centring the Study of Migrant Returns and Readmission Policies in Europe and Beyond Project* (Horizon Programme, #101094341) <https://www.returnmigration.eu/>. The research is funded by these 2 projects.
2. The first part of the research was conducted from June 2018–March 2019; the ethical approval based on the Ethics Committee Decision was obtained on 29 March 2018 with the approval code '2018/02' from Özyeğin University. For the second part of the research, conducted December 2023–March 2024, the ethical approval based on the Ethics Committee Decision was obtained on 26 April 2023 with the approval code '2023/07/07' from Özyeğin University. Regarding the interviews, oral consent was obtained from respondents and their anonymity and untraceability are ensured.
3. Voluntary Re-Availment of National Protection (Article 1(C)(1)); Voluntary Acquisition of a New Nationality (Article 1(C)(2)); Re-acquisition of Former Nationality (Article 1(C)(3)); Re-establishment in the Country of Origin (Article 1(C)(4)); Change of Circumstances in the Country of Origin (Article 1(C)(5)); and Other Grounds for Cessation (Article 1(C)(6)).
4. Relevant articles from the LFIP are Article 4–Non-Refoulement; Article 52–Individual Assessment for Deportation; Article 53–Appeal Mechanism; Article 55–Exemption from Deportation; Article 60/A–Assisted Voluntary Return; Article 63–Subsidiary Protection.

5. Relevant articles from the TPR are Article 4–Non-Refoulement; Article 6–Scope of Temporary Protection; Article 15–Termination of Temporary Protection; Article 42–Voluntary Return.

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Temporary Protection in the Shadow of the Refugee Convention: A View from the United States

Talia Inlender*

For more than 70 years, the 1951 Refugee Convention has provided a framework for assessing claims to international protection for those fleeing persecution, with the goal of seeking ‘permanent solutions’. Once found eligible, a grant of refugee protection generally opens a pathway to durable status in the country of refuge. Yet, in recent years, states – as well as those seeking protection – are turning less often to the legal framework set out by the Refugee Convention to respond to migration challenges and more to temporary forms of relief set forth in national laws and policies. This paper examines how the durable protections of the Refugee Convention have become less accessible to people seeking safety in the United States. It then argues that, in the shadow of declining access to the protection afforded by refugee and asylum law, temporary forms of protection – while long a part of US immigration law – were on the rise under the Biden administration. In particular it examines 4 country-specific humanitarian parole programmes, each of limited duration, that were created and operated by the US government between August 2021 and January 2025 for people from Afghanistan, Ukraine, Venezuela, Cuba, Haiti and Nicaragua. Before a change in political leadership led to their abrupt termination, over half a million people were granted temporary protection under these programmes, far outpacing grants of relief under the Refugee Convention and higher than the number of admissions through past humanitarian parole programmes operating over a similar time period. Grounded in an examination of these programmes, the paper proposes a framework for understanding the opportunities afforded and limitations posed by temporary protection programmes for those seeking safety, both in the United States and beyond.

Keywords: temporary protection, humanitarian parole, Refugee Convention, United States

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Introduction

What obligations do nations have to those seeking international protection and for how long do those obligations run? For over 7 decades, the 1951 United Nations Convention Relating to the Status of Refugees ('Refugee Convention') and its 1967 Protocol Relating to the Status of Refugees ('Protocol') have provided a framework for answering these questions – setting out guidelines that have been adopted by 146 countries for assessing claims to international protection with the goal of seeking 'permanent solutions' (UNHCR 2011: 72; United Nations Treaty Collection 2024). Once found eligible, a grant of refugee protection generally opens a pathway to durable status in the country of refuge (UNHCR 2011).¹

Yet, in recent years, states – as well as those seeking protection – are turning less often to the legal framework set out by the Refugee Convention to respond to forced migration and more often to temporary forms of relief set forth in national laws and policies. That shift is perhaps the most obvious in the European Union, which responded to the arrival of millions of people fleeing Russia's invasion of Ukraine by activating, for the first time, a Temporary Protection Directive (TPD) in March 2022 (Council of the European Union 2022). A little over 3 months later, more than 3.2 million Ukrainians had registered for temporary protection across the continent (UNHCR 2022). However, recent years also saw a shift towards temporary protection in the United States under the Biden administration, with the creation of 4 humanitarian parole programmes – each of limited duration – for people fleeing Afghanistan, Ukraine, Venezuela, Cuba, Haiti and Nicaragua (DHS 2021, 2022a, 2022b, 2023a, 2023b, 2023c, 2023d).

There are undoubtedly benefits to a shift toward temporary protection. Most obviously, temporary forms of relief allow states to act quickly in response to a large influx of people and provide immediate protection from *refoulement* as well as basic standards of treatment, which may include (depending on the programme) access to the labour market, housing or other social benefits. This is something that most overburdened refugee systems are simply unable to do. Temporary programmes may also allow for broader protection, extending to those who might otherwise not qualify under the limited definition of 'refugee' set forth in the Refugee Convention (1951: Art. 1). However, there are limitations as well. Temporary relief allows a state to respond to a humanitarian need without committing itself to processing or accepting claims for more long-lasting protection and to do so on a selective basis – privileging certain groups of migrants and not others – with little accountability. Temporary protection is also inherently unstable – a quality laid bare in the US context by President Trump's abrupt termination of humanitarian parole (and other temporary) programmes upon taking office in January 2025 (White House 2025a).

This paper makes the case that the Refugee Convention is becoming less accessible to those seeking international protection and that temporary forms of humanitarian protection – while not new – have risen in its shadow. My focus here is on how this phenomenon has unfolded in the United States with the recent proliferation of temporary humanitarian parole programmes, followed by an abrupt attempt to dismantle them. Bringing the literature on the history of temporary protection in the United States together with the ways it was used during the Biden administration, I explore the implications of a shift toward temporary programmes for the future of international protection, both in the United States and beyond. In so doing, I contribute to an urgent conversation about the evolving way that countries are responding to the needs of those fleeing harm and propose an analytical framework for assessing the merits of current and future temporary humanitarian protection programmes. The paper proceeds in three parts:

First, I offer a brief account of how the durable protections afforded by the Refugee Convention – incorporated into US law by the Refugee Act of 1980 – have become inaccessible to many people seeking safety in the United States.

Second, I make the case that, in the shadow of declining access to the permanent protection afforded by refugee and asylum law, temporary forms of protection – while long a part of US immigration law – were on the rise in the United States under the Biden administration. In particular, I examine the 4 country-specific humanitarian parole programmes that were created and operated by the US government between August 2021 and January 2025. I also address their abrupt termination with the change of political leadership under President Trump.

Third, grounded in an examination of the rise – and subsequent demise – of these programmes, I propose a framework for understanding the promises and limitations of temporary protection mechanisms in the shadow of a declining Refugee Convention. I argue that this framework provides a helpful tool for evaluating what a shift towards temporary forms of humanitarian protection may mean for the future of those seeking safety in the years to come, both in the United States and beyond.

Methodology

This paper synthesises the scholarship on temporary protection mechanisms in the United States with an examination of their implementation under the Biden administration to assess the implications of this approach to humanitarian protection. The analysis draws upon the rich literature of the history of temporary protection in the United States (Fullerton 2024; Martin, Schoenholtz and Waller Meyers 1998; Schacher 2022). It then complements that literature with a contemporary case-study analysis of 4 temporary humanitarian parole programmes that were created by the US government in rapid succession, beginning in August 2021 (DHS 2021, 2022a, 2022b, 2023a, 2023b, 2023c, 2023d). Through this integrated methodology – and informed by my nearly 2 decades of experience as a practitioner of immigration law in the United States – this paper offers an analytical framework for evaluating the merits and limitations of temporary protection regimes, with implications for both current policy assessment and future programme design.

The decline of the Refugee Convention in the United States

Forged in the wake of World War Two, the Refugee Convention and its Protocol have guided the administration of international protection for over 7 decades (Protocol Relating to the Status of Refugees 1967; Refugee Convention 1951). The United States ratified the Protocol in 1968, binding itself to the Refugee Convention's cornerstone principle of *non-refoulement*: a country's obligation to not 'expel or return' a person to a place where their 'life or freedom would be threatened on account of [their] race, religion, nationality, membership of a particular social group, or political opinion' (Refugee Convention 1951: Art. 33(1)). In 1980, the United States formally incorporated these obligations into domestic law through the Refugee Act (1980). Since then, the United States has offered protection to qualifying 'refugees' through 2 separate processes: refugee status and admission for those outside the United States (INA – Immigration and Nationality Act – §207) and asylum status for those physically present or arriving in the United States (INA §208). For both refugees and asylees, US law adopts the Refugee Convention's requirement that an individual have a 'well-founded fear of persecution on account of race, religion, nationality, membership in a particular social group, or political opinion' (INA

§101(a)(42)). Those admitted to the United States as refugees or asylees are eligible to adjust to lawful permanent resident status after 1 year and to become US citizens after 5 years (INA §209; INA §319).

While the United States admitted those seeking humanitarian protection before 1980 – including through temporary protection programmes, as discussed below – the Refugee Act has been the principal instrument for the admission of refugees and asylees for the past 40 years. Since 1980, more than 3.2 million refugees have been resettled in the United States (US Department of State 2024) and an estimated 2 million have been granted asylum status (Gilman 2023).² Scholars and advocates have highlighted important deficiencies in these instruments nearly from inception. Some have pointed to the fact that the refugee programme has an annual cap that fluctuates at the discretion of the President (Kerwin 2011). Others have shown how US political interests have significantly influenced asylum decision-making, positing ‘exceptionality as a basic feature’ of the system (Gilman 2023: 1). Still others have discussed the immense backlogs that have plagued the system, including in its early decades (Schoenholtz, Ramji-Nogales and Schrag 2021). Those backlogs continue today: with over 1.2 million asylum cases waiting to be adjudicated by US Citizenship and Immigration Services and over 1.6 million pending asylum cases in US immigration courts (Lafferty 2024; Transactional Records Access Clearinghouse 2022). Despite these challenges, the Refugee Convention, as implemented through the Refugee Act, remained the central humanitarian protection mechanism in the United States (Schoenholtz *et al.* 2021).

Yet mounting challenges have led to the significant decline of the Refugee Convention in the United States in recent years. Some of these challenges are not unique to the United States. The limited scope of the ‘refugee’ definition under the Convention – with its focus on the individualised harm that must be tied to race, religion, nationality, political opinion or social group – has been widely criticised as too narrow to address the protection needs that drive mass migration in today’s world, including natural disasters arising from climate change (Feller 2014: 61–63). These limitations are not a glitch but a feature of the Convention’s design. As James Hathaway (1991: 113–114) explains: ‘Refugee Law as it exists today is fundamentally concerned with the protection of powerful states’. It should therefore come as no surprise that the United States has used the narrow ‘refugee’ definition to exclude many people in need of humanitarian protection.

Even for those who may qualify as ‘refugees’ under the Convention, the United States has made it more and more difficult to access refugee and asylum status in recent years. The weakening of the US asylum system began under Presidents Clinton, Bush and Obama (FitzGerald 2019). However, it was President Trump who ‘began to destroy the asylum system in earnest’ during his first term in office (Schoenholtz *et al.* 2021: 3). He slashed the refugee cap to just 15,000 annually – the lowest since the Refugee Act of 1980 – blocking most admissions from abroad (Miroff 2020). He also adopted unprecedented policies to undermine protection for those seeking asylum at the US border, including – but not limited to – separating young children from their parents, expanding the detention of asylum-seekers, sending asylum-seekers to wait in Mexico until their claims could be heard in a US immigration court and announcing a ban on asylum eligibility for those who transited through Mexico or any other state that is a party to the Refugee Convention without applying – and being denied – refugee status in that country (Schoenholtz *et al.* 2021).

However, none of these measures led to the decline of the Refugee Convention’s protections in the United States as much as the Title 42 order. Under the guise of the COVID-19 pandemic, this so-called ‘public health’ order – implemented by President Trump during his first term and later extended by President Biden – led to nearly 3 million expulsions at the US–Mexico border, beginning in March 2020

until it terminated in May 2023, severely curtailing access to the asylum system (Chishti, Bush-Joseph and Montalvo 2024; Santamaria 2023).

While the Title 42 order is no longer in effect, its impact on the decline of the Refugee Convention in the United States cannot be overstated – it set a new baseline of presumptive exclusion that has continued since its expiration (Aleaziz 2023; Gilman 2020). The Biden administration erected significant obstacles to securing asylum at the border. This included a rule – reminiscent of Trump’s ‘transit ban’ – excluding from asylum eligibility most people who transit through a third country to reach the United States and do not seek asylum there (USCIS, DHS and DOJ 2023). It also included an executive order issued by President Biden significantly restricting access to the asylum system by establishing bars to eligibility and raising the threshold interview standards when border crossings meet a numerical limit (White House 2024a). This was followed by an even more sweeping shut down of access to refugee processing from abroad and access to asylum at the border when President Trump returned to office in January 2025. On the first day of his second term in office, President Trump suspended both the US refugee programme and the entry of migrants – including asylum-seekers – at the southern border (White House 2025b, 2025c).

In short, for reasons both political and practical, the durable relief of the Refugee Convention has become less and less accessible to those in search of protection in the United States.

The rise of temporary humanitarian protection programmes (August 2021–January 2025)

While the protections afforded by US refugee and asylum law have diminished in recent years, more people than ever continue to flee their homes in search of safety across borders (UNHCR 2023). In the United States, one response has been to offer temporary protection in the form of humanitarian parole. Beginning in August 2021, the US government created 4 new humanitarian parole programmes, each of 2-year initial duration, that benefited nationals of 6 countries: Afghanistan, Ukraine, Venezuela, Cuba, Haiti and Nicaragua. By April 2024, over 550,000 people had been granted humanitarian parole through these programmes (Batalova 2025) – more than 5 *times* the 91,279 total refugee admissions and asylum grants *combined* in Fiscal Years 2021 and 2022 (Baugh 2022; Gibson 2023).³ Although temporary forms of protection – including humanitarian parole – go back more than 70 years in the United States, it has never extended protection to as many people through humanitarian parole programmes in such a short period of time as it did between the summer of 2021 and the end of the Biden administration in January 2025 (Batalova 2025; Bier 2023a). Both the scale and the nature of these 4 recent programmes, coming as they did in the midst of a Refugee Convention in steep decline, present an opportunity for renewed examination of the promise and limitations of temporary protection mechanisms.

A brief overview of temporary protection in the United States

US immigration law and policy are no strangers to temporary statuses, including as a form of humanitarian protection. As Maryellen Fullerton (2024: 5) explains, ‘In the 1960s, a form of temporary protection known as extended voluntary departure (EVD) was frequently employed to allow individuals to remain in the United States when there were political crises in their homelands’. There is also a more than 70-year history of the use of executive parole authority to temporarily admit nationals of countries experiencing political turmoil – particularly as a result of Communism – including, *inter alia*, Hungary, ‘Indochina’ and Cuba (Martin *et al.* 1998; Schacher 2022). Then, in 1990, the US Congress created

Temporary Protected Status (TPS), affording time-limited relief to nationals of countries experiencing armed conflict, natural disasters and other extraordinary and temporary conditions (INA §244).

The Migration Policy Institute estimates that more than 2.5 million people currently in the United States 'hold or arrive through some kind of liminal legal status that may offer protection from deportation and the right to work but does not lead to a green card' or citizenship (Batalova 2025: 24). While there are a wide variety of these 'in-between statuses' in the United States, each with distinct features (Motomura 2025: 97), the most common forms of temporary status – accounting for over 70 per cent of beneficiaries – are Temporary Protected Status (TPS) and humanitarian parole (Batalova 2025). In addition to their prevalence, TPS and humanitarian parole are particularly relevant in that their purposes the most closely align with those of traditional understandings of international protection.⁴ An examination of these forms of status – how they came to be, who they protect, for how long and the challenges each has faced – provides an important context for this paper's assessment of the promises and limitations of temporary protection programmes as they have played out in the United States.

Temporary Protected Status

In 1990, the United States Congress passed a law creating Temporary Protected Status (TPS) (INA §244). TPS emerged in response to the Reagan administration's refusal to authorise extended voluntary departure (EVD) – a discretionary form of temporary relief for nationals of certain countries experiencing political violence – to those fleeing the violent civil war in El Salvador (Fullerton 2024). In enacting TPS, Congress erected statutory guardrails around executive discretion to designate countries for short-term protection; it made Salvadorans who had been continuously present in the United States since 1 September 1990 eligible for 18 months of temporary protection and gave the executive branch discretion to make decisions in accordance with statutory guidelines about when short-term protection might be authorised for other countries in the future (Immigration Act of 1990: sec. 303; Wilson 2024).⁵

TPS allows for the temporary designation of protected status for countries due to armed conflicts, natural disasters or other extraordinary and temporary conditions that prevent safe return to the homeland (INA §244(b)(1)(B)). In this way, the TPS statute affords protection to people who do not meet the narrower definition of 'refugee' under the Refugee Convention (Frelick 2020; Fullerton 2024). The statute permits the US government to designate a country for between 6 and 18 months of protection and requires the government to extend that protection so long as conditions remain unsafe (INA §244(b)(2)). Importantly, an individual from a designated country must already be residing in the United States at the date of designation in order to qualify for TPS (INA §244(c)(1)(A)(i)). The government may, however, 're-designate' a country by recognising a new or additional reason for designation; this process moves forward the required date on which an applicant must have been residing in the United States, the effect of which is to allow more recently arrived individuals to qualify for TPS (Wilson 2024). Still, foreign nationals residing outside of the United States on the date of designation (or re-designation) are not eligible to apply for TPS. Individuals granted TPS are authorised to work in the United States (INA §244(a)(1)(B)).

In 2024, TPS provided temporary immigration status to approximately 860,000 people from 16 countries (Wilson 2024), including Afghanistan, Burma, Cameroon, El Salvador, Ethiopia, Haiti, Honduras, Nepal, Nicaragua, Somalia, South Sudan, Syria, Ukraine, Venezuela, and Yemen. While TPS is ostensibly temporary, some designations have lasted for decades. For example, Somalia was initially designated for TPS over 30 years ago and was redesignated in January 2023 due to ongoing armed

conflict (USCIS 2023a). Honduras was initially designated in January 1999 in response to Hurricane Mitch and has been extended multiple times (USCIS 2025b). Similarly, El Salvador was initially designated in March 2001 due to armed conflict and has been repeatedly extended (USCIS 2025c). Nevertheless, when a country's TPS designation is extended or a re-designation is authorised, it is done on a limited time basis of up to 18 months. TPS-holders must re-register before the expiration of the temporary period in order to keep their legal status and work authorisation.

Other TPS designations are more recent, including for countries that have also benefited from new humanitarian parole programmes. Afghanistan was initially designated for TPS on 20 May 2022 and redesignated on 21 November 2023 (USCIS 2025d); Haiti was designated on 4 February 2023 (USCIS 2025e); Ukraine was initially designated on 19 April 2022 and redesignated on 20 October 2023 (USCIS 2025f) and Venezuela was initially designated on 9 March 2021 and redesignated on 3 October 2023 (USCIS 2025g). This means that nationals of these countries already in the United States as of the date of designation or redesignation – including those who entered through a humanitarian parole programme – could apply for TPS status.

TPS has not gone without challenge. When President Donald Trump came to power in 2017, he attempted to terminate TPS for more than 95 per cent of those who had TPS status at the time: over 300,000 people from El Salvador, Haiti, Honduras, Nepal, Nicaragua and Sudan (Cohn, Passel and Bialik 2019). That threat came with explicitly racist undertones: Trump famously demanded to know why the United States should take in immigrants from what he called 'shithole countries' rather than 'places like Norway' (Hirschfield Davis, Stolberg and Kaplan 2018). Lawsuits and intensive immigrant organising prevented Trump's TPS terminations from taking effect (Bhattarai vs Nielsen 2019; Ramos vs Nielsen 2018). In his re-election campaign, Trump again threatened to eliminate the programme should he be returned to office (Zhou 2024). He has thus far delivered on that threat by terminating or refusing to extend TPS designations for Venezuela, Haiti and Nepal, among others (USCIS and DHS 2025a; 2025b; 2025c; 2025d). While these decisions have been challenged, hundreds of thousands of TPS-holders have lost protection as the legal battles make their way through the courts (National TPS Alliance vs Noem 2025; VanSickle and Liptak 2025).

Humanitarian parole

While this paper makes the claim that temporary humanitarian parole programmes were an ascendant protection mechanism in the United States under the Biden administration, these programmes – and the legal authority that undergirds them – are not a new phenomenon. Humanitarian parole has its roots in the US Immigration and Nationality Act (INA). Initially enacted in 1952, the parole statute provides that:

The Attorney General may (...) in his discretion, parole into the United States temporarily under such conditions as he may prescribe only on a case-by-case basis for urgent humanitarian reasons or significant public benefit any alien applying for admission to the United States (...) (INA §212(d)(5)(A)).

Several features of the statutory text bear emphasis. First, like TPS, humanitarian parole operates as a protection mechanism for those facing 'urgent humanitarian reasons' – a standard that is more permissive than the narrow definition of 'refugee' in the Refugee Convention. Second – and like TPS – humanitarian parole is a creature of executive discretion. While this discretion is constrained by statutory requirements that the parole authority be exercised on a 'case-by-case basis' alongside a finding of 'urgent humanitarian reasons' or 'significant public benefit', those terms are left undefined, leaving

substantial room for executive decision-making. Third, while the statute provides that humanitarian parole is to be exercised ‘temporarily’, it offers no explicit time limits. Finally and crucially, unlike TPS, humanitarian parole can be exercised *upon or before* entry to the United States. There is no requirement that an individual already be physically present in the United States by a certain date in order to qualify for humanitarian parole.⁶ In this way, humanitarian parole is the most relevant temporary protection mechanism for those fleeing to the United States, including asylum-seekers who arrive at the border or refugees seeking protection from abroad.

Over the past 70 years, humanitarian parole has been used to provide temporary protection on an individual basis as well as through large-scale programmes to address ‘humanitarian crises’ (Chaudry 2023; Ciullo 2023). At least 126 parole programmes have been created between 1952 and the present day (Bier 2023a). Prior to the enactment of the Refugee Act in 1980, humanitarian parole was the primary means used to bring those considered to be refugees to the United States (Bruno 2020). In 1956, President Eisenhower first used the humanitarian parole authority to protect a group of forced migrants: approximately 30,000 Hungarians fleeing a failed revolution that was crushed by the Soviet Union (Santamaria 2024). Between 1956 and 1980, when the Refugee Act was incorporated into US law, the US government extended temporary parole to over 200,000 Cubans – beginning in 1961 – as well as to over 100,000 people fleeing Vietnam, Cambodia and Laos in the 1970s (Cox and Rodriguez 2020; US General Accounting Office 1979).

Even after the Refugee Act became law, the US government continued to use humanitarian parole to supplement refugee resettlement and facilitate family reunification (Bruno 2020: 7–11). For example, in 1980, the Attorney General paroled tens of thousands of Cubans and Haitians who came to the United States by boat (Bruno 2020). Then, in 1988, the Attorney General authorised the use of parole for people from Vietnam and the Soviet Union who had been denied refugee status (US General Accounting Office 1990a, 1990b). Approximately 50,000 people were granted parole under these programmes in the 10+ years that they were in operation (Bier 2023a). More recently, in 2014, the US government established the Central American Minors (CAM) programme for certain children in El Salvador, Guatemala and Honduras, which enabled children living in those countries to be considered for admission on parole for 3 years if they were deemed ineligible for refugee status (USCIS 2024a).⁷ More than 2,000 children have been granted parole under this programme (Bier 2023a).

While initial parole admission in each of these cases was temporary, in some (but not all) cases the US Congress followed parole programmes with legislation allowing for later adjustment to permanent resident status (Cuban Adjustment Act, P.L. 89-732 1966; Foreign Operations Act, P.L. 101-167 1989: sec. 599E; Hungarian Refugee Relief Act, P.L. 85-559 1958). Notable exceptions include Haitians and Central American minors, neither of whom were afforded a path to permanent residence based on their parole admission.

As with other forms of temporary protection in the United States, the use of the humanitarian parole authority has not been without controversy. In 1980, Congress amended the parole statute to restrict it from being used to admit individuals recognised as refugees, in an effort to prevent parole from operating as a shortcut to the existing refugee system and its quotas (Refugee Act of 1980: sec. 203(f)). In 1996, lawmakers replaced the statute’s original language (‘For emergent reasons or for reasons deemed strictly in the public interest’) with the current language (‘On a case-by-case basis for urgent humanitarian reasons or significant public benefit’) and amended the INA to count long-term parolees against the worldwide limits for family-sponsored immigrant visas (Illegal Immigration Reform and Responsibility Act (IIRIRA) (1996)). At the same time, Congress rejected amendments that would have narrowly defined the terms ‘urgent humanitarian reason’ and ‘strictly in the public interest’ to

encompass only very limited criteria (IIRIRA House Judiciary Report 1996: 140). More recently – and as discussed in further detail below – litigation was brought in to challenge the legality of country-specific parole programmes during the Biden administration and President Trump abruptly terminated them upon taking office (Texas vs DHS 2024; White House 2025a).⁸

In sum, parole has long been a tool of temporary humanitarian protection in the United States, both before and after the Refugee Act of 1980. It should come as little surprise then that, in the face of a declining Refugee Convention, the Biden administration turned to the parole authority to address forced migration, even as it limited access to refugee and asylum status. Indeed, in less than 3 years, over half a million people were granted temporary protection under the Biden administration's humanitarian parole programmes, far outpacing the approximately 91,000 grants of relief under the Refugee Convention (Batalova 2025: tab. 6; Baugh 2022; Gibson 2023). That number is also higher than for any previous parole programme over a similar time period: the closest comparison is perhaps the hundreds of thousands of Cubans admitted under previous humanitarian parole programmes – but these latter have operated over the course of many years and, in some cases, decades (Bier 2023a). An examination of the United States' increased use of the parole authority to create four similar but distinct humanitarian parole programmes in quick succession since 2021 – and the abrupt termination of those programmes with a change in political leadership in 2025 – offers a case study for assessing the opportunities and limits of both existing and future temporary protection programmes.

US Humanitarian Parole Programmes, August 2021–January 2025

Afghan Humanitarian Parole Programme (29 August 2021–1 October 2022)

In August 2021, after nearly 2 decades of military presence following the 11 September 2001 terrorist attacks, the United States withdrew its troops from Afghanistan (White House 2023). The Taliban quickly took control of the country, leading to a violent crackdown against those with actual or perceived ties to the United States or the West. Over 70,000 Afghans were evacuated to the United States and granted humanitarian parole upon arrival (Harris and Royan 2024). However, tens of thousands more were left behind in Afghanistan or were forced to flee to third countries. For these individuals, the Biden administration announced a new Afghan Humanitarian Parole Programme (DHS 2021).

The Afghan Humanitarian Parole Programme provided for a temporary, 2-year entry into the United States (Project Anar 2022; USCIS 2025i). Applicants were required to apply on an individual basis – meaning each family member was required to submit their own application – at a cost of \$545 per application. In addition to the application fee, applicants were required to provide a valid passport and to complete a biometrics security check in person at a US embassy.⁹ Applicants were also required to show proof of a sponsor in the United States who agreed to provide financial support during the temporary parole period. Initially, applicants had to show that they faced imminent harm or were at imminent risk of it (for those applying from within Afghanistan) or faced such a risk if returned (for those applying from a third country). Following a lawsuit challenging this requirement, applicants were able simply to show that they were part of a targeted group (Montoya-Galvez 2022a; Roe vs Mayorkas 2022). The US government did not place numerical limits on the number of individuals who could be granted parole under the programme; those who were granted it were authorised to work immediately upon entry to the United States. Congress also approved access to resettlement benefits for Afghan parolees, including housing, language and vocational assistance (Afghanistan Supplemental Appropriations Act 2021: div. C).

Beginning in August 2021, an estimated 52,870 Afghans filed applications under this parole programme. The US government took in an estimated \$25 million dollars in fees from these applications (Hauslohner 2022). Yet 2 years into the programme, the United States Citizenship and Immigration Service (USCIS), the US government agency responsible for processing these applications, had adjudicated only 30 per cent – or fewer than 17,000 – of these applications (Markey 2024). Worse yet, the US government approved only 1,860 of these cases and made initial positive eligibility determinations in 1,446 more – a mere 6 percent grant rate (Markey 2024). On 1 October 2022, the US government discontinued the Afghan Humanitarian Parole Programme, citing its desire to focus on permanent resettlement efforts (Montoya-Galvez 2022b). While no new applications are being accepted under the programme, tens of thousands of applications remain unadjudicated (Markey 2024). Those already paroled under the programme are eligible to apply to extend their parole status for an additional 2 years (DHS 2023e).

Uniting for Ukraine (21 April 2022–24 January 2025)

On 24 February 2022, Russia invaded Ukraine, prompting millions of Ukrainians to flee for safety, including to the United States (Ramji-Nogales 2022). At this time, the borders of the United States were otherwise largely closed to those seeking entry due to the Title 42 order (Chishti and Bolter 2022; CBP 2022). However, during the first several weeks of the war, the United States made an exception for Ukrainian nationals, who were processed at land ports of entry and permitted to enter (Chishti and Bolter 2022).

On 12 April 2022, the Biden administration announced its second country-specific humanitarian parole programme: Uniting for Ukraine (U4U). The programme's stated goal was to create a 'new streamlined process to provide Ukrainian citizens who have fled Russia's unprovoked war of aggression opportunities to come to the United States' (DHS 2022a). The US government committed to welcoming at least 100,000 Ukrainians under this programme and it did so: approving over 117,000 U4U applications in the programme's first year alone (Ainsley 2023).

The U4U programme was announced just 8 months after the Afghan Humanitarian Parole Programme. U4U was ostensibly modelled after the Afghan programme and, while the 2 share some characteristics, they also differ in important respects. Like the Afghan programme, U4U provided for a temporary, 2-year entry into the United States (DHS 2022a). It also required applicants to show proof of a sponsor in the United States who agreed to provide financial support during the temporary parole period.¹⁰ U4U similarly lacked a numerical cap on the number of people who could access the programme, provided immediate authorisation to work upon entry into the United States and afforded access to resettlement services (Additional Ukraine Supplemental Appropriations Act 2022).

Despite these similarities, there are significant differences between the 2 programmes. First, unlike the Afghan programme, which required individual applications for each family member at a cost of \$545 per application, U4U allowed all members of a family to submit a single application for humanitarian parole with no fee at all (DHS 2022a). Second, while Ukrainians applying for humanitarian parole through U4U were required to show a valid passport, they could complete other biometrics security requirements through an online attestation, rather than travelling to a US embassy to do so (*ibidem*). Third, U4U applicants were required to show that they resided in Ukraine immediately prior to the Russian invasion in February 2022 and were displaced as a result of it; unlike Afghans, there was no particularised requirement to show an imminent risk of harm or that they are part of a targeted group (*ibidem*). Finally, while the Afghan humanitarian parole programme stopped accepting new applications

in October 2022 – a little over a year after its inception – U4U remained open to new applicants for nearly 3 years, until a change in political leadership brought it to an end in January 2025 (Aleaziz 2025).

Perhaps the most crucial difference between the Afghan and the U4U programmes is in how each was implemented. As described above, 2 years into the Afghan parole programme, only a fraction of applications had been adjudicated and a mere 6 per cent of those applications – numbering just over 3,000 – had a positive determination. By contrast, U4U applications were processed at lightning speed from the start: more than 117,000 applications were processed within the first year alone (Ainsley 2023). By autumn 2023, the United States had welcomed more than 188,000 Ukrainian parolees primarily through the U4U programme, with thousands more arriving each month (USCRI 2024). This stark difference in treatment has been rightly scrutinised by scholars and advocates alike (Harris and Royan 2024; Ramji-Nogales 2022; Wolfe and Vanderlip 2023).

In February 2024, the US government announced a ‘re-parole’ process, allowing Ukrainian parolees to apply for a 2-year extension of their status (USCIS 2024b).¹¹ However, new applications ground to a halt just days after President Trump took office in January 2025 and paused the programme indefinitely (Aleaziz 2025).

Venezuela Parole Programme (19 October 2022–6 January 2023)

On 12 October 2022, a little over a year after the launch of the Afghan programme and 6 months following U4U, the US government announced yet another temporary humanitarian parole programme (DHS 2022b). This third programme created a new parole process for Venezuelans, who were arriving in record numbers at the US border due to political and economic instability in their home country (Ribando Seelke 2023). The programme was fashioned as part of ‘joint actions with Mexico to reduce the number of people arriving at our Southwest border and create a more orderly and safe process for people fleeing the humanitarian and economic crisis in Venezuela’ (DHS 2022b).

The Venezuela humanitarian parole programme shared some of the characteristics of its Afghan and Ukrainian predecessors. Like the earlier programmes, the temporary parole period was set at 2 years. The US government required applicants to show proof of a sponsor in the United States who agreed to provide financial support during the parole period. As in U4U, a valid passport and completion of a biometric security check – which could be completed online rather than in person – were required (*ibidem*).

However, the Venezuela programme was not as generous as U4U. Like Afghans, Venezuelans were required to file an individual parole application for each applicant, rather than submitting one application per family. However, while there was no application fee, Venezuelans granted parole were not authorised to work immediately upon entry to the United States. Instead, they were required to pay \$410 to apply for work authorisation once admitted: a process that not only cost money but delayed, for several months, Venezuelan parolees’ ability to support themselves upon arrival. Nor did Venezuelans receive access to resettlement services. Also unlike the Afghan or Ukraine programmes, the US government set a numerical limit on the number of people who could be granted parole through the Venezuela programme: capping the number of allowable grants at 24,000 per month. As part of this programme, Mexico agreed to accept returns of this same monthly number of Venezuelans who attempted to enter the United States between ports of entry and were turned away (Bruno 2023). Finally, the Venezuela programme – unlike U4U – rendered ineligible those who had previously been removed from the United States, had entered Panama or Mexico without authorisation or had crossed between US ports of entry after 19 October 2022 (*ibidem*).

The Venezuela parole programme operated as a standalone pathway for only a few months – with over 11,000 people admitted under its auspices – until it was folded into a broader programme that encompassed individuals from Cuba, Haiti, Nicaragua and Venezuela in January 2023 (Alles 2023).

Cuba, Haiti, Nicaragua and Venezuela Parole Programme (6 January 2023)

In January 2023, less than 3 months after the Venezuela programme was announced, the US government created 3 new temporary humanitarian parole processes for Cubans, Haitians and Nicaraguans, as well as updated the parole process for Venezuelans (DHS 2023a; 2023b; 2023c; 2023d). These processes are commonly referenced together as the Cuban, Haitian, Nicaraguan and Venezuelan (CHNV) parole programme (Bruno 2023). The US government cited serious political and economic instability, along with difficulties in effectuating deportations, among the reasons for the CHNV parole processes (DHS 2023a; 2023b; 2023c; 2023d).

The CHNV parole programme was almost identical to its Venezuelan predecessor. The temporary parole period was set at 2 years. The US government required applicants to show proof of a sponsor in the United States who agreed to provide financial support during the temporary parole period. A valid passport and completion of a biometric security check – which could be completed online rather than in person – was required (DHS 2024).

However, the CHNV programme – like the Venezuela programme – was not as generous as U4U. Cubans, Haitians, Nicaraguans and Venezuelans – like their Afghan counterparts – were required to file an individual parole application for each applicant, rather than submitting 1 application per family. Again, while there was no application fee, applicants from these 4 countries who were granted parole were not authorised to work immediately upon entry to the United States. Instead, they were required to pay \$410 to apply for work authorisation once admitted to the US, a process that can take several months. Access to resettlement services was available only to Cubans and Haitians but not to Venezuelans or Nicaraguans (USCIS 2024c). As with the Venezuela programme but not the Afghan or Ukraine ones, the US government set a numerical limit on the number of people who could be granted parole through the CHNV programme: capping the number of allowable grants at a total of 30,000 per month from all countries combined. As part of this programme, Mexico agreed to accept returns of this same monthly number of CHNV nationals who attempted to enter the United States between ports of entry and were turned away (Bruno 2023). Moreover, like its Venezuelan predecessor, the CHNV programme rendered ineligible those who had been previously removed from the United States, entered Panama or Mexico without authorisation or had crossed between US ports of entry after 5 January 2023. Perhaps most notably and contrary to the U4U and Afghan programmes, the US government announced in October 2024 – even before the change in presidential administrations – that CHNV parolees would not be able to apply to extend their status through a re-parole process (Montoya-Galvez 2024). As a result, those CHNV parolees with no other lawful means of remaining in the US past their initial 2-year parole period would be forced to depart or rendered undocumented.

The US government processed CHNV parole applications at a brisk pace: in the first 6 months alone, nearly 160,000 people from Cuba, Haiti, Nicaragua and Venezuela arrived in the United States under the CHNV parole programme (DHS 2023f). As of August 2024, nearly 530,000 people arrived in the United States under the programme (CBP 2024). Still, more than 1 million applications remained in a backlog due to the programme's monthly numerical cap (Montoya-Galvez 2023).

Table 1. Comparison of US temporary humanitarian parole programmes, 2021–2025

	Afghan Humanitarian Parole Programme 29 August 2021– 1 October 2022	Uniting for Ukraine ('U4U') 21 April 2022– 24 January 2025	Cuba, Haiti, Nicaragua and Venezuela ('CHNV') Parole Programme Venezuela only: 19 October 2022– 6 January 2023 CHNV programme: 6 January 2023– 24 January 2025
Application process	On paper	Online	Online
Application fees	\$575 or fee waiver requiring extensive documentation	Free	Free
Financial sponsor requirements	Yes	Yes	Yes
Interview process	Required	Waived	Waived
Individual vs family-based applications	Individual; each family member must apply separately	Family-based; immediate family members can apply in 1 application	Individual; each family member must apply separately
Duration of status	Up to 2 years; may apply to extend status through re-parole for additional 2 years	Up to 2 years; may apply to extend status through re-parole for additional 2 years	Up to 2 years; no option to apply to extend status through re-parole
Access to work authorisation	Immediately eligible to work upon entry; fee waived for initial work authorisation application	Immediately eligible to work upon entry; fee waived for initial work authorisation application	Eligible to apply for work authorisation after entry to the United States; \$410 or fee waiver requiring extensive documentation
Access to refugee resettlement services	Yes, for those paroled in from 31 July 2021–30 September 2023	Yes	Yes for Cubans and Haitians but No for Nicaraguans and Venezuelans
Approval numbers	Approximately 3,000 applications granted 2 years into the programme	Over 117,000 applications approved in first year	Nearly 160,000 applications granted in the first 6 months; approximately 530,000 people arrived under the programme by August 2024
Approval caps	None; re-parole programme for those already in the US began in June 2023	None; re-parole programme for those already in the US began in February 2024	Up to 30,000 combined monthly; up to same number of CHNV nationals subject to summary return at US–Mexico border, in coordination with Mexican government

Of all the Biden-era humanitarian parole programmes, that of CHNV received the greatest attention – and ire – with the change in political leadership. President Trump issued an Executive Order on his first day in office directing the programme’s termination (White House 2025a). Four days later, the processing of CHNV applications was formally paused through an internal agency memorandum that also ended U4U (Aleaziz 2025). In February 2025, a separate agency memorandum froze the processing of applications for ancillary immigration benefits for individuals who entered the United States through the CHNV and U4U programmes – putting in limbo the ability of people who entered via these programmes to secure more durable forms of legal status (Davidson 2025). Finally, in March 2025, the Trump administration formally terminated the CHNV programme and announced its intent to revoke the parole status and work authorisations of existing CHNV beneficiaries living in the United States (DHS 2025). While these actions have been challenged in litigation, in May 2025 the United States Supreme Court permitted the Trump administration to move forward with revoking the parole status and work authorisations of CHNV beneficiaries while the case wends its way through the courts (Doe vs Noem 2025a).

As the above discussion makes clear, the United States used humanitarian parole to extend temporary protection to hundreds of thousands of migrants between August 2021 and January 2025, even as it provided protection to just a fraction of that number through refugee and asylee admissions. Yet the United States accomplished this through programmes that were not created or implemented equally, despite being grounded in the same legal authority: the parole statute. It did so, too, without providing a path to long-term protection – leaving hundreds of thousands vulnerable when the programmes were abruptly terminated with the change in political leadership.

Towards a framework for assessing Temporary Protection Programmes

How should those who care about the future of international protection assess the promise and perils of temporary protection programmes? This question is not new. As these programmes took root in Europe and the United States in the early 1990s, Joan Fitzpatrick (1994: 16–19) argued:

Many states with developed systems for refugee determination and substantial absorptive capacity now channel certain asylum-seekers into schemes for temporary protection, with the avowed aim of facilitating their eventual repatriation by preventing them from developing the links that transform refugees into permanent immigrants (...) The current popularity of temporary protection cannot be explained as a belated recognition of the excessive narrowness of the Refugee Convention, but instead constitutes one more device to constrict access to asylum.

Other scholars viewed these programmes more favourably during the same period, observing that ‘temporary protection complements the asylum system’ (Martin *et al.* 1998: 558). Nadia Yakoob (1999: 632) summarised the results of a workshop with leading scholars on temporary protection in the United States and Europe during this period as follows:

[T]emporary protection has been a useful mechanism to respond to the initial phase of a forced migration emergency. It permits governments to provide protection to everyone, and to sort out a more permanent response later when the duration of the crisis is better understood.

Yet the question of how to assess temporary protection has grown increasingly urgent as these programmes have gained traction in the shadow of the Refugee Convention's decline. Here, I offer an analytical framework for evaluating temporary protection mechanisms, using the recent US humanitarian parole programmes as a case study. The purpose of this framework is twofold: first, to provide a useful tool for assessing the merits of any particular temporary protection programme. Second, to shed light on the crucial benefits that temporary protection programmes as a whole can provide in the shifting landscape of international protection, even as such programmes cannot serve as a substitute for access to the more durable protections offered by the Refugee Convention.

The promise of Temporary Protection Programmes

The US humanitarian parole programmes offer insights into the promise that temporary humanitarian programmes hold both for those seeking protection and countries considering extending it. Of these programmes, 3 components – the speed of implementation, the simplicity of access and the grounding which they provide to those who otherwise might never reach safety – make them a crucial tool for protection in the face of a declining Refugee Convention.

Speed

As the analysis above makes clear, the United States' temporary protection programmes have been much more quickly responsive to the needs of large groups in urgent humanitarian crisis. In the United States' faltering refugee system, people languish in camps for years awaiting an opportunity to travel to the United States (Kanno-Youngs and Jordan 2022). In its extremely backlogged asylum system, the United States takes an average of 4.5 years to resolve asylum cases in immigration court (Transaction Research Access Clearinghouse 2021). In the end, relatively few people ultimately secure either refugee or asylum status (Baugh 2022; Gibson 2023). In contrast, despite processing backlogs, the 4 temporary humanitarian protection programmes created since 2021 provided status to more than 5 times the number of people than the US' refugee and asylum systems during a similar period (Batalova 2025).

A second dimension of the favourable speed of temporary programmes also bears mention. In some cases, such as the Afghan Humanitarian Parole Programme and U4U, temporary protection programmes allowed for immediate access to the labour market without the need for separate work authorisation. While Cubans, Haitian, Nicaraguans and Venezuelans still needed to apply for employment authorisation, they were eligible to do so immediately on arrival. This speed is notable because asylum-seekers in the United States are not permitted to even *apply* for work authorisation until their asylum application has been pending for at least 150 days (8 Code of Federal Regulations §208.7) and the processing of such applications can sometimes take months – a delay that leads to significant precarity (Rabin 2021).

In short, the speed at which these temporary programmes were created and implemented offers significant promise as a mechanism for delivering swift protection – including access to the labour market – to those in urgent need, especially as backlogs continue to cripple access to the Refugee Convention.

Simplicity

A related but distinctly promising feature of the recent US humanitarian parole programmes is the relative simplicity of the application process. Applications for them are much more accessible than the

legally complex asylum application, which is 12 pages long and accompanied by another 12 pages of instructions in English (USCIS 2025j, 2025k). In contrast, while also in English, parole applications do not require the applicant to produce detailed information and evidence in support of their claim for relief or to state the protected grounds – race, religion, nationality, political opinion or membership in a particular social group – that form the basis of their legal claim (USCIS 2025l). Instead, the most complex portion of parole applications is the financial information required from prospective sponsors: the onus for this detail therefore falls more on the US-based person than on the individual seeking protection.

As a result, parole applications can be more readily completed without the need for intensive legal assistance. This is crucial because a lack of representation has posed a significant barrier to accessing protection in the US asylum system. Studies have shown that it is nearly impossible even to apply for asylum in immigration court without legal counsel (Eagly and Shafer 2015; Transactional Research Access Clearinghouse 2024). Yet in cases where representation is secured, two-thirds of asylum applicants were found legally entitled to remain (Transactional Research Access Clearinghouse 2024). These findings suggest that a majority of protection-seekers in the United States have valid claims to remain. More streamlined application processes, like those offered by the recent humanitarian parole programmes, can help to ensure that states are better meeting their obligations to afford protection to those in need (Motomura 2020).

The relative simplicity of the application process for these humanitarian parole programmes creates the potential for broader and more meaningful access to protection – a potential that was realised in the U4U and CHNV parole programmes.

Grounding

Perhaps the most important promise of temporary protection programmes, such as the recent US humanitarian parole programmes, is that they create an opportunity for forced migrants to develop attachments in a safe country. I refer to this beneficial feature of temporary protection programmes as ‘grounding’. Once a person is in a country of refuge, even if temporarily, the nature of the country’s relationship to that individual changes, making it harder for the person to later be turned away, particularly without a strong justification for doing so. This notion of ‘grounding’ aligns with Jean-Francois Durieux’s concept of refuge ‘time as attachment’ (Durieux 2015: 226–227). Building on this concept, Jessica Schultz (2021: 174) has observed that states offer ‘a basket of rights and benefits that accrue over time (...) [and] increase as the refugee’s relationship to the state evolves (...)’ In the context of the Refugee Convention, James Hathaway (2005: 156) has described this trajectory as ‘an assimilative path’, where states are encouraged to offer naturalisation as a measure of these increased attachments after the passage of time, generally 3 to 5 years. While the Convention recognises that cessation of status may be appropriate for specific reasons, these are generally limited (Schultz 2021).

In the case of the United States, where access to the refugee and asylum systems has diminished in recent years, humanitarian parole has been one of the few ways to access protection and begin to develop the attachments that may lead to longer-term protection. While the initial periods of stay are temporary, the fact that people are actually in the country makes it more likely that they may develop attachments that will lead to durable protection, particularly if conditions remain unsafe in their home countries. TPS in the United States provides an example of this, with nationals of some countries where conditions have remained unsafe having their ‘temporary’ status extended over decades. These extended periods of ‘temporary’ status have led scholars like Hiroshi Motomura (2020: 501) to observe that there is ‘no bright line that separates temporary from permanent’.

The opportunity for Afghans and Ukrainians to extend their initial 2-year parole periods for an additional 2 years, as well as the Biden administration's extension of TPS to nationals of these countries, are further examples of this dynamic in action. While the lack of an extension option for CHNV parolees is a notable exception, many of these individuals may be eligible to remain in the United States through other programmes offered to those already on US soil, including asylum (Montoya-Galvez 2024). For Afghans, there has been an additional benefit: the US government committed to reviewing asylum applications from Afghan parolees within 150 days – an extremely expedited process which, if successful, leads to durable protection (USCIS 2023b). In this way, temporary programmes can serve as a complement to – rather than a replacement for – the longer-term protections of the Refugee Convention (Galbraith 2015).

To be sure, the Trump administration's premature revocation of CHNV parole grants for those already in the United States and its attempt to halt the processing of applications submitted by those who entered through the CHNV and U4U programmes for more-durable immigration benefits call into question how much 'grounding' will benefit those with temporary protection in moving forward. Yet, even in these instances, the fact that individuals have developed attachments has proven relevant in court challenges. For example, a court ordered the Trump administration to resume the processing of immigration benefits applications – including for asylum, adjustment of status and other more durable forms of relief – for these populations (Doe vs Noem 2025b).

The speed, simplicity and grounding that temporary protection programmes can provide make them an important and increasingly necessary tool of humanitarian protection in the face of the diminution of the Refugee Convention.

The limitations of Temporary Protection Programmes

Temporary programmes, however, also suffer from significant drawbacks. Here, too, the recent US humanitarian parole programmes provide an important window into potential limitations. These include their subjectivity, detachment from international norms and accountability (referred to below as their 'solitary' nature) and instability.

Subjectivity

As the prior discussion of the recent US humanitarian parole programme shows, temporary protection programmes are initiated and operated with significant subjectivity on the part of the government, made possible by their largely discretionary nature. In the US context, this is true even where the authority for such programmes lies in statutes passed by the US Congress, such as TPS and humanitarian parole.¹² As a result, both *who* has access to temporary programmes and *what* benefits are afforded through a particular programme are largely subjective, left up to the discretion of the executive in power.¹³ The United States' recent humanitarian parole programmes illustrate this subjectivity along both dimensions.

With respect to the *who*, unlike refugee or asylum status – which can be extended to qualifying individuals of any nationality – the US government's humanitarian parole programmes have historically been country-specific. This means that the government designates access to the temporary protection programme by nationality. As the recent US programmes demonstrate, such choices are based at least as much on political considerations as on humanitarian ones. The choice of Afghanistan was directly tied to the United States' decades-long military engagement there. The choice of Ukraine was linked to the

United States' geopolitical interest in containing Putin's power and, as discussed further below, tracks with the US' more favourable treatment of white migrants. The choices of Venezuela, Nicaragua, Cuba and Haiti were driven not only by humanitarian concerns in those countries but also by the political reality that the United States struggled to deport people arriving in large numbers from each of these countries at the southern border (DHS 2021, 2022a, 2022b, 2023a, 2023b, 2023c). Indeed, there are many other countries where humanitarian crises may be as acute but to which the United States has not chosen to extend humanitarian parole to those seeking protection from abroad.

The subjectivity of temporary protection programmes extends to their implementation. From application criteria to costs and from benefits to processing speeds, temporary protection programmes can be designed differently, affording divergent treatment by country. Again, the US experience provides a helpful lens. The U4U programme was designed more favourably than the Afghan and CHNV programmes. With the ability to submit 1 application per family (as opposed to per individual) without charge and to receive immediate access to the labour market upon entry to the United States at no cost, together with the lightning speed of processing – without numerical caps or other limits – Ukrainians had access to benefits beyond those extended to Afghans, Cubans, Nicaraguans, Venezuelans and Haitians. As a result, far fewer Afghans were able to access humanitarian parole than Ukrainians during the duration of the Afghan Humanitarian Parole Programme. Nationals of Cuba, Haiti, Nicaragua and Venezuela who were granted parole still had to pay over \$400 to access work authorisations after entry, while Ukrainians were automatically authorised to work without cost upon arrival. Worse still, the Biden administration's decision not to offer the option to extend parole to Cubans, Haitians, Nicaraguans and Venezuelans left nearly 200,000 people in limbo, unless they had another available pathway to remain in lawful status (Montoya-Galvez 2024), a threat which became all the more concrete when President Trump, upon taking office, terminated the programme and revoked the parole grants and work authorisations of CHNV beneficiaries in the United States (DHS 2025; White House 2025a).

In short, even when a country is designated for temporary protection, the subjective nature of such programmes may result in unequal treatment in implementation. In contrast, applicants for refugee and asylee status in the United States – regardless of nationality – are all subject to the same application processes, fees and benefits upon approval. To be sure, the US asylum system also privileges certain nationalities over others (Gilman 2023). Nevertheless, the ability to apply for asylum irrespective of nationality makes it distinct from the humanitarian parole from which most nationalities are entirely excluded at the outset.

Solitary

The subjectivity evident in temporary protection programmes is made possible, in part, because of a second potential limitation of such programmes: their detachment from international norms and accountability. As scholars have noted, the Refugee Convention is 'one of the most widely accepted international norms, and probably one of the few to have penetrated public consciousness' (Kneebone, Baldassar and Stevens 2014: 4). The normative power of the Refugee Convention creates a measure of accountability both on the international stage and in the domestic context when a signatory is flouting its obligations. For example, a US court struck down Trump's asylum 'transit ban' for violating the United States' obligations under the Refugee Convention, as incorporated by US asylum laws (*East Bay Sanctuary Covenant vs Barr* 2021).

In contrast, temporary protection programmes – in particular, the recent US humanitarian parole programmes – are guided far more by national norms and US foreign policy interests than accountability

to international obligations. As discussed above, the countries selected for protection aligned with foreign policy concerns – including the US’ military withdrawal from Afghanistan, anti-Putin stance and perceived need to bring down the numbers of border-crossings from countries where deportations are difficult to effectuate. The level of protection afforded similarly varies with national norms. For example, in the US context, the benefits of the recent humanitarian parole programmes track US racial hierarchies – with white Ukrainians receiving preferential treatment over black and brown migrants from Afghanistan, Cuba, Haiti, Nicaragua and Venezuela (Harris and Royan 2024; Ramji-Nogales 2022).¹⁴ In the context of nation-centred temporary protection programmes, there is less recourse to international norms as a remedy for such unequal treatment.

(In)stability

A final limitation of temporary protection programmes is perhaps the most obvious: such programmes are, by definition, time-limited and, as a result, inherently unstable. In the United States, each of the recent humanitarian parole programmes sets an initial entry period of 2 years, with little discussion of what would happen to people after that initial period ended. While possibilities exist for extending short-term statuses either through ‘re-parole’, as was done for Afghan and Ukrainian parolees (though notably not for CHNV parolees) and through TPS – should it survive the Trump administration’s attempts to terminate it – a clear path to long-term protection remains out of reach for those who do not otherwise qualify for or take advantage of the US asylum system.

Notably, in the past, US temporary humanitarian parole programmes were followed by large-scale legalisation programmes; as previously discussed, this was the case for the initial group of Hungarians parolees, as well as those from ‘Indochina’ and Cuba who followed (Foreign Operations Act, P.L. 101-167 1989: sec. 599E; Hungarian Refugee Relief Act, P.L. 85-559 1958). Yet past practice has not led to similar results in recent years. For example, the Afghan Adjustment Act, which would have created a path to permanent residency for Afghan parolees, faltered in favour of a discretionary ‘re-parole’ for another 2 years and expedited processing for those able to navigate the more-complex asylum process (CAIR California 2023). Similar legislation for Ukrainian parolees also failed to pass (Ukrainian Adjustment Act 2023). No such legislation for long-term legalisation was even introduced for Haitian, Nicaraguan or Venezuelan parolees.

The short-term nature of temporary protection mechanisms leaves the programmes themselves – and those who benefit from them – vulnerable. As Cecilia Menjívar (2006) has noted in the context of TPS, the frequent need for renewal and extended periods of uncertainty leaves temporary protection-holders in a state of ‘liminal legality’. The short time horizons allow for regular intervals at which a programme’s continuation may be brought into question, challenged or eliminated. Even before these time horizons elapse, temporary programmes are unstable because, at bottom, they are acts of domestic decision-making that are viewed as exercises of discretion rather than of obligation. As the above discussion makes clear, this instability has played out in stark relief in the US context. Almost immediately following the announcement of the CHNV programme, Republican-led states brought litigation to challenge it (Texas vs DHS 2024). While that litigation was unsuccessful, candidate Trump threatened to dismantle the CHNV and other parole programmes if returned to office (Hesson 2023). He immediately followed through on these threats, abruptly terminating the CHNV and U4U programmes and stripping existing CHNV beneficiaries of their legal status and work authorisations – putting them at risk of deportation even before the expiration of their initial 2-year parole periods (DHS 2025; White House 2025a).

The subjective, solitary and unstable nature of temporary protection programmes is a significant drawback. However, by identifying these limitations, this paper does not seek to argue against temporary protection programmes as a whole. Instead, the considerations laid out above offer a framework for assessing the merits of current and future temporary protection programmes to help guide the implementation of temporary protection mechanisms that maximise the promise – and minimise the limitations – of such programmes for those seeking protection in the years to come.

Building towards better Temporary Protection Programmes

What might a temporary protection programme that maximises speed, simplicity and grounding while minimising subjectivity, solitariness and instability look like? While there need not be a one-size-fits-all approach, lessons learned from the US experience provide fodder for the development of future programmes. Some ideas include:

- **Speed:** The timely review of applications with clear benchmarks for approvals and investment of resources to meet those benchmarks, alongside automatic employment authorisation in approved cases for immediate access to the labour market, without the need for a separate employment authorisation process.
- **Simplicity:** A streamlined application process that can be accessed and completed entirely online – inclusive of biometric and other background checks – along with alternate language versions accessible to applicants.
- **Grounding:** Integration opportunities for programme participants, with the recognition that some – though not all – may want or need to remain. These might include access to language courses, vocational training and/or housing, medical and psychosocial support. This aspect might be partly facilitated by sponsors or community organisations, as in recent US-based models, with government investment to ensure sustainability.
- **Subjectivity:** To fend off the unequal treatment of certain populations, states may consider legislating baseline requirements for temporary programmes, as has been done for Temporary Protected Status in the United States; these might include the requirement that all temporary programmes offer immediate access to employment authorisation, parity in application costs (if any) and predetermined benchmarks for extension.
- **Solitary:** To address the lesser accountability present in temporary protection programmes; situating them within states' broader humanitarian protection obligations, rather than simply as acts of domestic discretion, may yield better results. This might include the incorporation of such programmes into domestic legal frameworks or explicit recognition of the programme as part of a state's broader humanitarian protection obligations under international law.
- **(In)Stability:** To combat the potential for legal limbo that temporary programmes risk, programmes should include a built-in guarantee of the initial protection period and a mechanism for extension based on pre-determined criteria – including ongoing urgent humanitarian need – at the outset of the programme, as well as a pathway for transition to a permanent lawful status after a pre-determined number of years, should the temporary conditions persist.

Conclusion

How should we evaluate temporary protection programmes as we look to the future? In the short term, this examination suggests that these programmes offer significant benefits. As this case study shows, the recent humanitarian parole programmes are one of the few ways in which the United States afforded protection in recent years, in the face of significant limitations on the more durable protections provided by the Refugee Convention. These programmes also have the benefit of injecting much-needed energy into labour markets and opening up heretofore unavailable pathways to migration.

In the long term, the answer is less clear-cut. First, these programmes risk closing the door on much of the world's population who, because of race, religion, lack of political power or other disadvantages, will not be able to reap the benefits of state-driven, country-specific humanitarian parole programmes that rely on political will for their creation. Furthermore, to the extent that refugee or asylum status under the Refugee Convention remains out of reach for many, any substitution of these programmes for the more durable status may leave a less-equal world in its wake. Second, it remains an open question whether these programmes will create longer-term pathways to legalisation and integration for those in need of durable relief or – as the recent experience in the United States suggests – whether they will create second-class citizens locked in ongoing instability and at risk of removal in response to shifts in political leadership.

While this paper concludes that temporary programmes are a crucial protection mechanism in the face of a declining Refugee Convention, a rigorous assessment of current and future temporary protection programmes could help to ensure that such programmes achieve their maximum promise of speed, simplicity and grounding, while minimising the limitations of subjectivity, solitariness and instability.

Notes

1. While not a requirement of the 1951 Convention, 'many States Parties grant permanent residence status to refugees in their territories after several years, eventually leading to their integration and naturalization' (UNHCR 2011: 98). That is certainly true in the United States, where the US Immigration and Nationality Act (INA) §209 provides for refugees' adjustment to lawful permanent resident status after 1 year of physical presence in the United States and INA §319 provides for refugees' naturalisation after 5 years of lawful permanent residence.
2. This estimated figure of asylum grants since 1980 is drawn from Gilman (2023), showing asylum grant rates of approximately 50,000 per year from 1996 to 2023 and estimating similar or slightly lower rates for 1980 to 1995.
3. Fiscal years 2021 and 2022 are the most recent years for which comprehensive refugee admission and asylum grant data are available from the US government. The data show that 25,518 persons were admitted to the United States as refugees in fiscal year 2022 and an additional 36,615 people were granted asylum in that year (Gibson 2023). In fiscal year 2021, 11,454 persons were admitted to the United States as refugees and an additional 17,692 were granted asylum (Baugh 2022).
4. While beyond the scope of this paper, another notable form of temporary protection in the United States is the Deferred Action for Childhood Arrivals (DACA) programme (USCIS 2025a). Approximately 580,000 young people currently hold DACA status, though legal challenges have prevented the granting of new applications since September 2017 (*ibidem*). DACA is distinct from TPS and humanitarian parole in that it protects certain young people who arrived in the

United States as children; its emphasis is therefore less on traditional understandings of humanitarian protection for those facing danger in their home country and more on recognising existing ties to the US. The government also offers other forms of temporary status to applicants for special visas set aside for victims of serious crimes (the U Visa) and immigrant children who have been abandoned, abused or neglected by 1 or both parents (Special Immigrant Juvenile Status or SIJS) (INA §101(a)(15)(U); INA §101(a)(27)(J)). Unlike TPS, DACA and humanitarian parole, the U Visa and SIJS ultimately set their recipients on a path to lawful permanent residency. In short, there are a variety of what Hiroshi Motomura (2025: 97) calls ‘in-between statuses’. As discussed above, this paper focuses on TPS and humanitarian parole both because they are the most common and because they the most closely align with traditional understandings of the purposes of international protection.

5. While EVD largely faded after the advent of TPS, the president retains discretion through the constitutional power to conduct foreign relations to grant deferred enforced departure (DED), another form of temporary relief from removal which has no statutory basis. This is a much-less-commonly used form of temporary protection; in 2024, it was only in effect for nationals of Hong Kong, Liberia and Palestine (Wilson 2024).
6. In some cases, the government has created parole programmes for those already in the United States – generally referred to as ‘parole-in-place’ programmes. Examples include parole-in-place for military spouses (USCIS 2025h) and a newly-announced programme that would allow for the parole of spouses of US citizens who have lived in the United States for 10 years or more (White House 2024b).
7. President Trump attempted to end the CAM parole programme in August 2017 while the Biden administration began accepting new applications in 2021 (USCIS 2024a).
8. The author served as co-counsel for Intervenor Defendants in this litigation, defending the challenged humanitarian parole programmes.
9. This was true despite the fact that the US embassy in Kabul was shuttered on 31 August 2021 (US Department of State 2021).
10. For an analysis of the opportunities and challenges of the financial sponsorship requirement of recent humanitarian parole programmes, see Bier (2023b).
11. Notably, Ukrainians applying for re-parole are required to pay a \$580 application fee, while Afghans applying for re-parole are not (USCRI 2024).
12. This is also true of the European context, where the EU’s Temporary Protection Directive was activated for the first time in response to Russia’s invasion of Ukraine, despite other large-scale migrations, including those from Syria, Afghanistan, Tunisia, Libya and Iraq (İneli-Ciğer 2022).
13. Maryellen Fullerton (2024: 50) offers a response to this subjectivity: legislation that ‘preserve[s] a role for administrative discretion in a legislative framework, and devise[s] effective mechanisms for initiating and terminating temporary parole policies’.
14. President Trump’s recent welcoming of white South African refugees, despite a pause on processing for other populations, has drawn similar criticism of race-based discrimination in the refugee context (White House 2025d).

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ARTICLES —

Why Exit? Exploring the Motivations of Displaced Ukrainians Leaving Norway

Aadne Aasland*, Oleksandra Deineko**

What prompts people to leave a welfare state and return to a home country in war? This paper examines why Ukrainians who fled to Norway due to the war voluntarily returned home or moved elsewhere. Using an exploratory research design, the study investigates how characteristics of Norwegian society, emotional ties and networks influence these decisions. The article applies a framework of individual, structural and policy-related factors to show how conditions in both the home and the host country interact. Theories on transnationalism and belonging highlight how returnees and onward movers maintain their connections to Norway. The findings reveal that social obligations, such as caring for relatives and children's well-being, often outweigh security concerns. Among structural factors, a 'paradox of leaving' emerges, where aspects of the welfare state, such as Norway's healthcare system, can motivate departure due to cultural differences in medical treatment. Limited job opportunities also drive exit, compounded by public discourse reinforcing 'limiting beliefs' about employment prospects. Finally, the study highlights how many displaced Ukrainians adopt a transnational approach, maintaining multiple attachments that include Norway.

Keywords: displacement, return, refugees, Ukrainians, belonging

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Introduction

Following Russia's full-scale invasion of Ukraine in February 2022, many Ukrainian citizens sought protection in other European countries. Unlike economic migrants, most Ukrainians did not plan to migrate but were forced to flee due to the war. This has implications for both their integration and their return aspirations. At the start of 2025, Norway had granted collective protection – the status given to protection-seekers after the full-scale invasion – to more than 88,000 Ukrainians.¹ This is substantially more than the other Scandinavian countries.

According to IOM (2025), over 1 million Ukrainians have returned from abroad since the full-scale invasion. Although most of them have returned from neighbouring countries, many have also returned from states with a high level of welfare, such as Germany. At the time of writing (January 2025), of those registered for collective protection in Norway, about 79,000 still had valid collective protection, suggesting that the remainder (just over 9,000 people) were likely to have left the country.² This article seeks to explore these people's motivation for leaving Norway after a relatively short time. Norway ranks high on international indices of welfare and happiness (Helliwell, Layard, Sachs, De Neve, Akinin and Wang 2024; UNDP 2024) and, according to most migration theories, Norway is a country which people are more likely to move to rather than from, due in part to its low unemployment rate, high incomes, stable political situation and generous welfare state. Norway also stands out favourably in terms of the support provided to displaced Ukrainians compared to many other countries (Hernes, Danielson, Tvedt *et al.* 2023a). Unlike other groups of migrants, displaced Ukrainians are returning to an ongoing active war. Additionally, they are in the initial phase of their stay in Norway, receiving generous support from the state and various integration opportunities. The issue as such is what causes people who have embarked on the longer journey to Norway, rather than to a neighbouring country, to make the seemingly unlikely decision to leave after a relatively short stay.

This study contributes to the migration scholarship by exploring the motivations of such 'unlikely leavers', potentially revealing aspects of European host societies that may be less apparent among those who remain over time. By examining the experiences of early leavers, this study sheds light on potential mismatches between expectations and realities in host societies, offering insights into factors that shape refugee mobility beyond traditional push and pull dynamics.

The article addresses two main research questions:

- *What factors contributed to the decision to leave Norway? To what extent were characteristics of Norwegian society a major reason for leaving?*
- *Have displaced Ukrainians who have left Norway developed emotional or network ties to the country that they also retained after returning or moving onwards?*

Conceptual framework

Reasons for refugee return and onward migration

While different groups of migrants may share similar aspirations to migrate or return (Carling, Bolognani, Erdal, Ezzati, Oeppen, Paasche, Pettersen and Sagmo 2015; de Haas 2011), refugees are likely to have distinct rationales for their decisions to return or move onwards to other countries (Hernes, Aasland, Deineko and Handå Myhre 2025). Koser and Kuschminder (2015) separate the determinants of refugees' return migration into 3 broad categories: structural (conditions in both the host and the

home country), individual (including individual attributes such as age and gender and social relations such as family and networks) and policy interventions.

In an analysis of over 150 countries from 1991–2018, Zakirova and Buzurukov (2021) found that the strongest predictors of refugee return migration are political factors in the home country, including a reduction in human-rights violations and the end of genocides/politocides and wars, together with peace agreements. Economic incentives were found to be a relatively weak motive for refugees' return, while relative structural conditions in home and host countries were important. Access to education, which combines economic and social aspects, was also an influential factor.

A growing body of qualitative research has highlighted the significance of contextual factors in shaping return intentions and actual return decisions among migrants (Al Husein and Wagner 2023; Kunuroglu, van de Vijver and Yagmur 2016; Tezcan 2019). Studying Ukrainian refugees in Norway who left the country after a relatively short time is particularly relevant for the study of voluntary return as it can provide nuances to established theories on refugee return migration. According to existing models, political stability and the cessation of conflict are among the strongest predictors of return. However, in our case, Ukrainians are returning voluntarily despite an ongoing war, making it reasonable to explore other factors driving their decisions that outweigh security concerns.

We apply Koser and Kuschminder's (2015) framework by examining how structural, individual and policy-related factors in both home and host countries interact in this unique case. The study provides an opportunity to explore the role of host-country conditions, such as Norway's temporary protection policies, labour-market access and social integration, in shaping return decisions. Furthermore, Zakirova and Buzurukov's (2021) finding that economic incentives are weak predictors of return migration raises important questions about whether Ukrainian returnees and onward movers are more motivated by social and psychological factors than by economic opportunities.

A useful lens through which to understand the motivations behind return migration, particularly among refugees, offers Albert Hirschman's (1970) framework on *exit, voice and loyalty*. While much research focuses on exit (migration) and voice (political expression), loyalty – defined as a commitment to a collective even under adverse conditions – may also help to explain return decisions. Loyalty in this context can manifest as a sense of duty or moral responsibility to the home country. These motivations may not be easily captured by standard economic or security-based models of migration decision-making but are highly relevant in the case of war-related displacement.

Belonging and transnational ties after leaving Norway

Our second research question asks whether displaced Ukrainians have formed persisting emotional or network ties to Norway during their stay in the country. We investigate whether ties to Norway and Norwegians endure beyond departure, even among those who leave relatively quickly, as is the case with the participants in our study. To examine the presence and nature of such ties, we employ theories of transnationalism and belonging.

Transnationalism theory emphasises the presence of social networks that extend beyond national boundaries (Vertovec 2009). It highlights the concept of multiple belongings, suggesting that individuals may feel connected to more than one place or community (Cheran 2006). Although previous studies often use this framework to reflect on the practices of labour migrants or diaspora members, Al-Ali, Black and Koser (2001) conclude that refugees are engaged in a wide range of transnational activities, inviting them to be included within the framework of transnationalism. Refugees often maintain strong ties with their country of origin even while residing in a host country – but connections to the host

country can also develop among those returning or moving onwards. Like other migrants, refugees may experience complex feelings of attachment to their home country, their host country and sometimes even third countries. Such nuanced senses of belonging could not only impact on decisions regarding return or onward movement but could also potentially influence ongoing affiliation with a previous host society. Some departing individuals may even consider returning to their previous host society, in our case Norway, at a later stage.

Transnational activities are often categorised as economic (especially remittances), socio-cultural (keeping in touch with relatives abroad and visits) and political activities (political-party membership, voting, lobbying and civic activities). However, there are fewer studies on the emotional aspects of transnational lives (Kemppainen, Kemppainen, Saukkonen and Kuusio 2022). Some studies have approached transnational belonging from the perspective of emotional attachment and imaginative practices (Klok, van Tilburg, Suanet, Fokkema and Huisman 2017). Imaginative transnational belonging can include nostalgia and longing for one's country of origin, as well as the desire to return. Conversely, we hypothesise that Ukrainian refugees who have returned to Ukraine may experience an imaginative transnational belonging to Norway and seek to identify how they frame this in terms of their future plans.

Studying the transnational activities – or the readiness to realise them – in the case of Ukrainian refugees with collective protection is heuristic from several perspectives. Firstly, it provides an understanding of transnationalism from a short-term perspective, as previous research on transnational networks has tended to focus on migrants who have long-standing ties with the host country (Nuga 2024). Secondly, we interview people who have returned to their home state or moved onwards, while most previous research has focused on people still living in a host country. Thirdly, a newly conducted study on Ukrainian refugee experiences in Germany highlights that, due to the multiple uncertainties determined by the temporality of collective protection for Ukrainian refugees in Europe, transnational ties have become a type of coping strategy through which to overcome the unknown future (Lapshyna 2025). This brings new practical meaning to the transnationalism framework in light of the 'temporary turn' in contemporary integration policies (Sandberg, Schultz and Syppli Kohl 2025). Finally, we examine networking with Norway through a future-oriented lens, considering whether these attachments, sense of belonging, identity and social capital could be converted into future plans for continued contacts – for example, via labour migration.

Do transnational activities ensure a sense of belonging and emotional attachment to both home and host countries? How does the decision to return influence them? For refugees and displaced people, multiple attachments often hold heightened significance as they navigate the intricate intersections of their past, present and future lives. Yet transnational ties to a previous host society may also persist without much sense of emotional attachment (Youkhana 2015; Yuval-Davis 2011).

Refugees and displaced people may grapple with questions of *belonging* as they navigate between their country of origin, their current host country and third countries. Antonsich (2010: 644) posits that belonging should be analysed 'both as a personal, intimate, feeling of being "at home" in a place (place-belongingness) and as a discursive resource that constructs, claims, justifies, or resists forms of socio-spatial inclusion/exclusion (politics of belonging)'. Home-studies literature offers various perspectives on refugees' feelings of being 'at home' in a place. Dossa and Golubovic (2019) argue that displacement complicates the comprehension of what it means to be at home. Recent studies on the concept of home, such as that by Boccagni (2022: 585), reframe it as a matter of 'homing', evolving from viewing 'home as a place', through 'home in the making', to a novel understanding of 'home as becoming', thus reconsidering home as a social process rather than a place or state.

Although European countries vary in how they receive displaced Ukrainians, in most cases Ukrainian refugees do not stay in refugee camps for years; registration and settlement occur more quickly (Hernes *et al.* 2023a), thus helping them to avoid the ‘campisation’ often experienced by other refugee groups who are granted individual asylum. This generally improves their chances of successful home-making practices, fostering a stronger sense of belonging to the host state. On the other hand, collective protection introduces a sense of temporariness, which can hinder the establishment of a sense of home in the host country due to the looming thought of being sent home. Integration challenges experienced by Ukrainian refugees in European countries should also be mentioned as one of the barriers that hinders home-making and belonging in the host countries (Deineko and Aasland 2024; Kosyakova, Gatskova, Koch, Adunts, Braunfels, Goßner, Konle-Seidl, Schwanhäuser and Vandenhirtz 2024). The perspective of transnationalism allows us to examine Ukrainian refugee homing beyond the ‘here and there’ dichotomy (as described by Taylor 2013), suggesting a framework of multiple belongings (Deineko and Aasland 2024).

Remaining family members in Norway, friendships established while residing in the country and economic and professional ties serve as examples of potential links that do not necessarily involve sentiments of belonging. We explore whether and how displaced Ukrainians who have left Norway have developed an emotional attachment and sense of belonging to the country from which they departed, together with their potential involvement in transnational activities involving Norway that do not necessarily include any strong emotional ties to the country.

Data and methods

The article builds on 8 qualitative semi-structured interviews conducted in the winter of 2024 with Ukrainians who fled to Norway after the full-scale Russian invasion of Ukraine in February 2022 but who later voluntarily left the country. We recruited the interviewees via online surveys that were conducted among Ukrainian refugees in Norway in 2022 and 2023, in which respondents were asked if they were willing to leave their email addresses so that they could be contacted for follow-up interviews (for the methodology of the surveys in Norway, see Hernes, Aasland, Deineko, Myhre, Liodden, Myrvold, Leirvik and Danielsen 2023b).

When the 2023 survey was conducted, some of those who had shared their email address in the 2022 survey had already moved back to Ukraine or on to another country, providing an opportunity to ask them about their reasons for leaving in a separate section of the survey. A total of 21 respondents who had already left Norway responded. This sample is too small to make firm conclusions about reasons for leaving but it can be illustrative of important trends, as also demonstrated by IOM (2025) statistics (see Table 1 for an overview).

The EXIT-Norway project is particularly interested in understanding what characteristics of Norwegian society lead immigrants to leave the country.³ With the substantial influx of Ukrainian refugees to Norway, we recognised that exploring the interplay of motivations for leaving among a recently arrived group whose home country remains at war could provide valuable insights into why forced migrants choose to leave a host society renowned for its highly developed welfare system and generous reception environment for refugees.

A request was sent by email to respondents who stated in the survey that they had left Norway. Online interviews on Zoom were arranged with 8 such respondents. Six of them had left for Ukraine and 2 had moved on to other Western countries. The interviews lasted around 40–60 minutes and were

conducted in Ukrainian and transcribed using Autotext (Whisper), with immediate checks for quality. They were then anonymised⁴ and coded in Nvivo.

Table 1. Main reasons indicated for leaving Norway (N=21)

Ukraine is my home*	8
I / my family was longing to go back to Ukraine*	7
To be with family members back in Ukraine /to be closer to family and friends***	7
Hard to use my competence /qualifications in Norway	6
It felt safe/safer to move back to Ukraine than previously*	5
Children's education	5
Could not find work in Norway	5
Lack of support in Norway (practical, financial, etc.)	3
Norway did not meet my expectations	3
I'm only temporarily back in Ukraine; might move abroad again*	3
Other reason	3
Language challenges**	2
Better opportunities in another country**	1
I never planned to live in Norway**	1

Notes: *Option only for those who had returned to Ukraine;

** Option only for those who had moved to another country;

*** Wording of question adjusted to context but merged.

With its small number of interviewees, we acknowledge important limitations to our study. We do not assert that our qualitative findings achieve saturation in terms of elucidating all the reasons behind people's decisions to return to a war-torn Ukraine or choose alternative destinations. It should also be noted that all our interviewees were women. Thus, our findings cannot be used to make firm generalisations about why people return or move onwards.⁵ However, while our survey responses (Table 1) only provide a broad overview and illustration of displaced Ukrainians' motivations for leaving Norway, we contend that our semi-structured interviews with a subset of these respondents add relevant nuance by yielding a deeper understanding of personal experiences and perceptions. The findings therefore contribute valuable insights into the intricate interplay of factors that ultimately shape emigration outcomes. Key characteristics of the interviewees are presented in Table 2.

Table 2. Key characteristics of interviewees

Interview	Age group in years	Length of stay in Norway	Moved to	Family in Norway
1	>29	1–2+ years	Ukraine South-East	Alone
2	30–39	0–3 months	Ukraine South-East	Single with children
3	40–49	0–3 months	Ukraine Central/North	Alone
4	50–59	4–12 months	Other country	Extended family
5	30–39	4–12 months	Ukraine South-East	Single with children
6	30–39	4–12 months	Ukraine Central/North	Single with children
7	50–59	0–3 months	Ukraine West	Couple with children
8	30–39	4–12 months	Other country	Alone

The Norwegian reception of displaced Ukrainians

Norway is not part of the EU nor bound by the EU's Temporary Protection Directive. Nevertheless, after Russia's full-scale invasion in 2022, the country introduced legislation that mirrored the directive in most respects. Persons granted collective protection in Norway received a residence permit for 1 year, with the possibility of extending it for up to 3 years. Although there are many similarities between European countries receiving displaced Ukrainians, there are significant differences in the rights, services, benefits and integration measures they provide (Hernes *et al.* 2023a). Norway has provided displaced Ukrainians with similar rights to those of other protection-holders, including financial assistance and integration measures. Individuals with temporary protection can work, reunite with family and have access to kindergarten, education and healthcare services. People under the age of 55 have a right – but not an obligation – to attend the Norwegian Introduction Programme, which includes language training, work experience and informational elements. Participants receive generous benefits while attending.

Research has shown that, overall, Ukrainians have been very satisfied with their reception in Norway (Hernes *et al.* 2023b). However, concerns have been noted regarding services and assistance in job-seeking (Hernes *et al.* 2023b: 63–64). The Norwegian authorities have increasingly stressed that displaced Ukrainians should enter the labour market faster, as participation rates are currently lower than in neighbouring countries. They further emphasise that the stay is intended to be temporary, with the goal of return when conditions in Ukraine improve. After our interviews were conducted, the authorities also introduced certain restrictions to reduce the number of new arrivals (Aasland 2024).

Results

Family and children as a main exit factor

Research has shown that migration decisions are usually made by the entire household and take the interests of all family members into consideration (Massey, Arango, Hugo, Kouaouci, Pellegrino and Taylor 1993). In most contexts, if the family does not migrate as a unit, it is usually the male representative who migrates first. In a Ukraine at war, the situation has been the opposite. Due to restrictions on male migration, refugees from Ukraine, especially after the full-scale Russian invasion, were predominantly women. As a general rule, men aged 18–60 are not allowed to leave the country under martial law (Deineko and Hernes 2024).

Several of our interviewees mentioned family concerns as their reason for leaving Norway, in particular the presence of close family members who had remained in Ukraine. These family members could be husbands: 'Well, the main reason why we left Norway was (...) that my husband stayed in Ukraine' (Interview 6) but they could also be adult sons who were unable to leave the country. Some interviewees also mentioned elderly parents who needed care as a contributing factor in their decision to return. Such reflections on returning included both emotional and practical aspects of the family living separately. In a few cases, relatives remaining in Ukraine could exert indirect or direct pressure on the displaced people to return. For example, one interviewee's elderly mother, who was in poor health, urged her daughter to come home, a request that had been difficult to ignore. Several interviewees explicitly stated that they would probably have stayed in Norway if the whole family had been able to be together.

While research on displaced Ukrainians in Norway has shown that most children adapt well into Norwegian society and rapidly integrate into Norwegian schools (Hernes *et al.* 2023b), this is not the case with all Ukrainian children. Among our interviewees, there were several accounts of children finding it difficult to make Norwegian friends, leaving them feeling isolated, being bullied and even unwilling to attend Norwegian school:

So, they [her previous friends] started to leave her and she stayed alone during school breaks and went home alone. Somehow the boys from the parallel class also began to get annoyed with her. She wears glasses and they took her glasses case and began to throw it around. She was very upset and said, well, she wouldn't go to school any more (Interview 5).

According to the mother, the consideration for this child was the main reason for returning to Ukraine. Parents sometimes needed to make difficult choices for their children about returning to a much-less-secure environment in Ukraine, with occasional Russian attacks but in a setting where they believed their children would be more likely to thrive:

So, I came back to Ukraine, saw how strong she [her daughter] was here, well, there was shelling, when we were there for New Year (...) but the air defence still works, well, I just looked at it this way. (...) I understand she's a child and she doesn't make decisions but, for her psychological state, she needed it [to go back to Ukraine] (Interview 6).

Several returnees and onward movers interviewed still had family members staying in Norway. For some, this meant that they were eager to visit Norway again so that they could be together.

Work prospects as a structural reason for returning

The interviewees mentioned various work-related challenges as factors contributing to their decision to move, with some highlighting them as their main reason for departure. Work was an important push factor for leaving, as several interviewees saw no prospects of finding relevant work in Norway.

A few were discouraged from the start by perceiving – or being told – that it was hard to find a decent job in Norway without speaking Norwegian or English. Such information was given by the interviewee's contact person in the municipality or by the local social-welfare/employment agency *Nav*. One interviewee said: 'We were told that it was impossible if you did not know English or Norwegian' (Interview 8). She had done some online remote work with clients in Ukraine instead. The Introduction Programme offered to Ukrainian refugees, which aimed to qualify them for jobs in the Norwegian labour market, was not seen as attractive by all interviewees, since it would take time to qualify for a proper job:

Somehow it was said that you have to go on this [Introduction] programme to study. It was a year. I said: 'I'm sorry, but I cannot go to school for a year, I'm already of such an age'. I asked: 'Can I work somewhere and study [in parallel]?' Well, no, there, well, somehow it was said that I couldn't. I then said: 'I don't have time (...) to spend a whole year at school' (Interview 3).

Competition with native Norwegians or immigrants from EU countries for the same jobs was also mentioned as an obstacle:

[I] applied for a job at a kindergarten. But then, when I had a meeting with the director of the kindergarten, she told me that it all depends on whether there will be any more Norwegian applicants for this position. Because first they will consider them, then those people who have a European citizenship, the EU and then us. So, that was the problem. So, again, I was simply not invited to the internship (Interview 1).

For those being settled in a rural area, a lack of relevant workplaces could be a major challenge. One interviewee who found a part-time job in a fish factory was dismissed due to layoffs and could not find other work in the municipality. She believed that if she had continued to work there, she would have stayed in Norway, as she still had family there:

In November [2022] I was dismissed, well, since they laid off many workers, those who were temporary workers and that includes me. They just told me one day that 'That's it, we don't need your services'. But if I'd kept this work at the factory, maybe I would have stayed and worked at the factory and we would have all been together as a family. Because now I miss it [Norway] a lot (Interview 4).

Others were concerned about finding a job where they could use their previous education or qualifications in Norway. The uncertainty about staying in Norway when their temporary protection expired made some question the utility of investing in a new career path. Changing a profession can be challenging for someone with long work experience. One interviewee, who reflected on her future options during a brief trip to Ukraine, decided to return:

And when I looked at all this, I realised that now I either need to go to Norway for a new profession or to be dependent on money from the state – which I didn't want at all – or I go back home to Ukraine (Interview 1).

The refusal to live on social benefits was shared by others:

And from September [2022] onwards, let's say, I didn't have the conscience to take these social payments, these 600 kroner they paid us. I understood that I want more and I can work – but there's simply nowhere to work (Interview 4).

Strict labour-hiring legislation in Norway was also mentioned as an obstacle:

I even wanted to pick strawberries, there, along the road (...) Well, he didn't hire us. We went, asked, he said, 'No, for legal reasons you cannot work here'. The country is quite legal, so... (Interview 3).

For others, work obligations and opportunities in Ukraine were major reasons for returning. With only temporary protection in Norway, Ukrainian refugees must also consider the possibility of returning in the future, making job prospects in their home country a relevant concern. A dilemma may arise if, for example, a previous employer requires an emigrant's immediate return to retain a position in Ukraine, as was the case for one interviewee who had worked at a children's centre but left soon after the full-scale invasion:

First, they closed down the centre. But our director reopened it, it started running but then I left for Norway. She wrote to me all summer [2022] saying that I should return, because there was lots of work,

many children were returning; she said I had to work, that I should return. And so, probably, she also played a role in my decision to leave [Norway] (Interview 5).

Having job prospects in Ukraine or a third country was a decisive factor for several interviewees, as one who had returned to Ukraine explained:

There was still a problem with work. Because I was sent to work practice without any problems but, when there was a question about permanent work, unfortunately, I was refused. And the only thing my curator⁶ could offer me was to go to university, to change my profession. [...] I continued to work online, working with Ukraine. I knew that I had a job to go back to. I didn't have such a dead-end situation (...). I knew that I could find a job but, in Norway, with my background, it was difficult in this regard (Interview 1).

The Norwegian health system as a reason for leaving the country

The Norwegian health system is characterised by universal coverage, providing comprehensive healthcare services to all residents, including displaced people from Ukraine who have the same rights to healthcare services as Norwegian citizens. However, healthcare is an area where displaced people from Ukraine have had mixed experiences in Norway. A 'culture clash' has been observed between the Norwegian and Ukrainian cultures, for example regarding the threshold to see a doctor or a specialist and access to or use of medication (Hernes *et al.* 2023b).

Negative experiences with the Norwegian healthcare system was a recurring theme when interviewees were asked about their experiences in Norway and their reasons for moving. One of the interviewees put it like this: 'In Norway you need to take maximum care of yourself. If you're Ukrainian, you need to take a hospital with you' (Interview 6). Many saw the system involving a mandatory consultation with a general practitioner (*fastlege*) before referral to a specialist as a serious obstacle to obtaining necessary medical treatment. The role of the healthcare system in the decision to return to Ukraine is illustrated by the following statement:

One reason was my health, because I started having back problems – it was very difficult for me to walk. I went to my general practitioner in Norway. (...) As he explained to me, I didn't have any serious symptoms. (...) Unfortunately, he couldn't refer me to a specialist and when I came back [to Ukraine], it turned out that I had a hernia in my back. (...) So my healthcare experience wasn't good. (...) I got used to, for example, my doctor in Ukraine always being in touch with me, I could call him if something happened. (...) This is also one of the reasons why I moved [from Norway] (Interview 1).

For others, healthcare was not given as a main reason for leaving but something that would have been difficult to adapt to had they stayed on:

Yes, thank God we didn't get sick but my children hit my finger with a stone when the kids were playing – and very hard – so that my finger got injured. (...) It should have been thoroughly disinfected or even an X-ray taken, in my view. But when we arrived at the hospital, they just looked, they didn't even disinfect it, they just glued it with some cream and that's it. It was really weird. And it's also good that we're back home, because it was quite scary for us (Interview 2).

One of the interviewees who had moved on to the US praised the health insurance that she had access to there; she compared the US favourably to Norway:

Another question is about the availability of healthcare. When we arrived [in the US], the first thing we received was health insurance, which the state gave us for free. In Norway, well, let's say, this wasn't possible. I lived [in Norway] for almost a year. I got sick once, a severe fungal infection developed and it was very problematic. That is, you first had to go to the general practitioner and, as for specialists, I won't even talk about it [...]. So in this regard, America is much better (Interview 4).

One of the few interviewees who expressed satisfaction with the healthcare system in Norway underlined the differences between the cultures in the 2 countries in terms of when a visit to the doctor is deemed necessary:

Well, I had a very pleasant impression of the medical system, because I didn't wait in a queue anywhere; maybe there was no such crowd of people, influx, everything was very clear. I'll tell you honestly, I don't go to doctors, I'm like Norwegians, (...), I treat myself with water. I like that country [Norway] in this respect, I could very well live there, I don't need to take an X-ray straight away (Interview 3).

Altruistic reasons and expressions of loyalty

Some interviewees cited societal benefits as a significant or contributing factor in their decision to return to Ukraine. This included, as mentioned, a desire not to burden Norwegian society and taxpayers. Our focus here, however, is on their wish to contribute to Ukrainian society. Two main arguments emerged from our interview data.

The first argument is the recognition that people from territories occupied by Russia or areas close to the frontline are in more-urgent need of protection than those in less-affected areas, such as the western part of the country. At the beginning of the war, the situation was unpredictable and many feared a total Russian occupation of Ukraine. Now, some perceive the situation as somewhat stable, recognising that certain areas of Ukraine are under less immediate threat. This implies that, while no part of Ukraine is completely safe, some areas are safer than others. As such, some felt that it was now safer to return and did not want to exploit the asylum system by taking up resources that could be used for people from Eastern Ukraine whom they felt were in greater need:

There's no safe place in Ukraine now. And we had bombings literally 200 metres from our house. But our situation is not as catastrophic as in Eastern Ukraine. My daughter and I decided that we wouldn't take a place from people from the East and that we would bring more benefit to Ukraine. That's our story (Interview 7).

The second argument is the belief that, despite the potential for a better economic situation and greater security in Norway, the most important task is to support and rebuild a war-torn Ukrainian society:

In Norway, I would just sit there, receive something. Maybe if I'd stayed, I would have had more and better food, maybe something else would have been better than now. Yes, there wouldn't be alarms several times a day. But what good am I in Norway? None. And here I feel like I bring a lot of benefit. (...) If we all move and everyone just sits and waits for someone to do everything, I don't think that's the right

approach. I feel like I'm on the right path, doing a lot of useful things for my country. It's my contribution to victory (Interview 7).

Thus, some people's decision to return to Ukraine is driven by a sense of duty to their country and a desire to make a meaningful contribution to its recovery and future.

Attachments to Ukraine and Norway: Leaving Norway, keeping transnational connections

From the survey (Table 1), we saw that attachment to Ukraine could be a main reason for return. This was also highlighted by our interviewees, who explained that Ukraine – or their home town – was their home and that their life in Ukraine had been good:

Before the full-scale invasion – and even after – I didn't want to leave. I always wanted to live in Ukraine (...) I always had a feeling that [home town] was my home and I didn't want to move at all. I could go anywhere with my language skills (...). I lived in [other] countries a bit but Ukraine was still my home and I wanted to build my life there (Interview 1).

Interviewees also expressed a strong emotional attachment to Ukraine and their place of living when the full-scale invasion took place, consistently considering it their true home despite safety considerations and the amenities available in Norway. This includes the two interviewees who moved onwards from Norway to other countries but still hoped to go 'home' to Ukraine in the future, despite the practical hurdles.

While emotional attachments to Ukraine were strong among all 8 interviewees, responses were mixed when asked whether they had built an attachment to Norway or Norwegians. Though Norwegians were commonly referred to as friendly, helpful and welcoming, only a few interviewees had developed deep friendships with Norwegians during their stay. Language challenges might have been a reason for this. Our interviewees appreciated what they described as a Norwegian welcoming attitude towards displaced Ukrainians. One interviewee shed tears while explaining how complete strangers had approached her and her children with material and emotional support, while another described how her landlord had filled up her family's fridge and provided them transport on different occasions. However, a few interviewees had negative experiences with Norwegians and Norwegian culture. This involved a feeling of being culturally disconnected, finding Norwegians colder and less open to deep friendships. Differences in cultural codes were also mentioned – for example, when to invite friends home – making it difficult for some to connect with Norwegians.

While the displaced Ukrainians in our study had all left Norway and had varied experiences with Norwegians and Norwegian culture, it was striking to find that most maintained some connection with the country. Some even expressed an intention to return, particularly those who reunited with family members, such as husbands or sons, back in Ukraine. They might consider returning once the war ends, or if the restriction preventing Ukrainian men aged 18–60 from leaving the country is lifted.

Although some interviewees explicitly stated that they did not wish to remain in Norway as refugees dependent on the welfare system, they were open to returning as labour migrants. Their motivations varied: some felt that Norway offered a more-secure future than war-torn Ukraine, while others felt a sense of gratitude toward a country that helped them in a time of need: 'I simply want to thank them for everything they did for us. I would gladly work there [to] show my appreciation' (Interview 3).

Norwegian nature was mentioned as an important asset and was even highlighted as the factor they liked or missed the most about Norway and a main reason why they felt 'at home' in the country: 'I felt at home there. Especially the nature. Everything is nice there. And I have a love for nature' (Interview 2). Comfort was found in natural landscapes in Norway reminiscent of those in their home district or parts of Ukraine with which they were familiar. Interviewees described how the Norwegian nature, mountains and sea helped them to relax and heal their worries about the war.

While only a few interviewees were seriously considering a permanent return to Norway, most emphasised other ways of maintaining contact with the country, often through digital means:

I still keep in touch with Norway, with my friends who were there. I talk about how much I miss Norway, its vastness, its nature, its quiet, measured life. It was close to me because that's how I lived at home. It was comfortable for me (Interview 4).

Language played a role in Ukrainian refugees' decisions as well. One interviewee stood out as she continued studying Norwegian even after returning to Ukraine, hoping that her improved language skills would boost her chances of later finding work in Norway that aligned with her previous education and qualifications.

Even a short stay in Norway could leave an imprint and some of the interviewees noted that they had started to behave in a more 'Norwegian way' after returning to Ukraine, as shown in the following statement:

They're very friendly; we're always a bit more serious people. It was unusual at first but I got used to it. When I came home to Ukraine, I also smiled at people and the security guards in the store looked at me with suspicion as if something was wrong. Secondly, what I like about Norwegians, if you have a day off, you have a day off. (...) I'm trying to do that now. A slightly slower pace of life. You could call it that. And we [Ukrainians] always (...) hurry somewhere. We need everything fast, fast, fast (Interview 1).

This shows that they had learned and incorporated some Norwegian 'cultural codes' in the course of their short stay in Norway, providing additional grounds for maintaining a sense of belonging and transnational ties with the country.

Discussion

Structural, individual and policy factors as reasons for return

To answer our first research question, we return to Koser and Kuschminder's (2015) typology. Our findings suggest that combinations of structural, individual and policy factors in both home and host countries are important for refugees' decisions to leave after a relatively short time. While this is likely to be the case with most refugee departures, we would argue that both the temporality of Ukrainian refugees' protection and particular factors in the Norwegian context add nuances to the literature on refugees' rationale for leaving a highly developed welfare society such as that of Norway. In this article, we have particularly focused on how conditions in the host country contributed to the decision to leave.

Although our sample is too small to make generalisations, the lack of prospects of long-term employment appears to play a crucial role among the *structural factors*. With limited command of the

local language, it was difficult for our interviewees to find a job where they could utilise their previous qualifications. It is also striking how several of the interviewees gave up looking for work after receiving discouraging information about job prospects from their contact persons in the municipalities or from other public services. Furthermore, our findings suggest that the Norwegian system of dispersing displaced Ukrainians to districts with limited or one-sided labour markets may reduce work opportunities for well-qualified individuals. For persons with better job prospects in Ukraine – or in other countries – leaving Norway was therefore considered a better choice.

Surprisingly, the Norwegian welfare state was rarely considered as a reason for remaining in the country. The healthcare system in particular was more often considered a reason for leaving than for staying, explained by its perceived low quality and untimely access to services. Furthermore, several interviewees expressed a desire to avoid long-term dependence on welfare and would only stay in Norway as contributors and taxpayers. Some even considered returning to Norway if they could join the labour force, viewing this as a way of showing gratitude for the country's support during their time of need.

It is notable that structural factors in the host country which, according to the literature, are often associated with refugee return, were not given by our interviewees as reasons for leaving Norway. They were generally satisfied with the economic support and other public welfare services offered, including housing provided by the municipalities in which they were settled. They were also largely satisfied with the Norwegian reception system for refugees and with the rules and regulations regarding protection (interviews were conducted before restrictions had been introduced). None of the interviewees talked about general anti-refugee sentiments or discrimination. With only one exception, they did not perceive any hostility from the host population that made them feel unwelcome – quite the opposite. Nevertheless, language barriers were raised not only as a concern when it comes to finding a job but also as an obstacle to closer social integration with Norwegians.

Family considerations were found to be of great importance, with keeping the family together often outweighing both security and welfare concerns associated with leaving Norway. Homesickness was also a common sentiment that played an important role in the interviewees' decision to leave. Furthermore, they emphasised that the decision was made collectively as a family, taking into account the interests of all family members, both in Norway and Ukraine, which prompts us to suggest that *familial* factors should be added to the *individual* factors in Koser and Kuschminder's (2015) typology. For some interviewees, their children's struggles with social and school integration in Norway were significant reasons for returning to Ukraine. Opinions on Norwegian schools were mixed, particularly regarding the level of freedom given to children. While this freedom was seen as beneficial for children's well-being, it was also perceived as a potential obstacle to learning. Additionally, it is noteworthy that interviewees expressed altruistic and patriotic motivations, believing that their return would both create space for more vulnerable refugees and allow them to contribute to the rebuilding of a war-torn Ukraine.

The final component in Koser and Kuschminder's (2015) typology is *policy interventions*. The most obvious policy restrictions for return are restrictive immigration and asylum policy and various forms of legal uncertainty. Such factors also played a role for our interviewees' decision to leave Norway, although more indirectly than directly. Our interviewees left long before the temporary protection status had expired and they remained free to either stay or leave. The minimal financial support from the Norwegian state that refugees receive if they decide to return was barely mentioned by our interviewees unless prompted, so it appears to have played a very minor role in return decisions. The Ukrainian authorities had not established a programme for returnees but the knowledge that staying in

Norway would necessarily mean investment in language, work and social integration, without necessarily leading to a long-term solution, makes the uncertain legal status a highly relevant aspect of decisions to leave. While legal uncertainty may not have been the primary trigger for return, it shaped the broader context in which decisions were made, reinforcing other factors that ultimately led to departure.

It should also be noted that the recent measures introduced by Norway to restrict Ukrainian refugees' access to temporary protection could contribute to the impression that Norway may eventually implement policies aimed at forcing Ukrainian refugees to leave. Further research is needed to determine whether such policy changes are prompting Ukrainian refugees currently in Norway to reconsider their future plans.

Leaving Norway – keeping connections?

To answer the second research question on whether displaced Ukrainians who have left Norway developed emotional or network ties to the host country, we return to the prism of transnationalism and belonging.

Our study highlights that those who returned to Ukraine had strong emotional attachments to the country, while their experiences with Norwegians and Norwegian culture varied. It is worth mentioning that most have maintained some connection with Norway and its people – and even experience nostalgia. Most of our interviewees continued to maintain regular contact with displaced Ukrainians they had met in Norway, whether in reception centres or municipalities. Some also stay in touch with Norwegians, often landlords or welfare workers, such as refugee-service contacts or school-teachers. While few reported forming lasting friendships with Norwegians, suggesting that such relationships were less common, we assume that these experiences are an important factor in establishing further transnational activities. Since Ukrainian refugees in Norway spent minimal time in reception centres and were able to live privately with family or friends, they were settled relatively quickly (Hernes *et al.* 2023b). This allowed them to enhance social ties at the local level from the onset. Their integration began earlier and engaged previously less 'visible' actors who play a significant role in refugee integration during the initial period in Norway, such as private hosts, diaspora members and NGOs. These new structural conditions have created pathways to transnational connections and attachments for those who decided to return.

The results of our study are difficult to compare with previous research in this field (Al-Ali *et al.* 2001; Kemppainen *et al.* 2022; Klok *et al.* 2017), as we interviewed individuals who were in the host state for a short time and had already returned to Ukraine. However, we identified features of imaginative transnational belonging through informants' reflections on Norwegian nature, nostalgia for Norway and a desire to return in the future as tourists or labour migrants. Some interviewees had even learned and incorporated Norwegian 'cultural codes' into their habits and behaviour patterns, providing additional grounds for maintaining a sense of belonging and transnational ties with the country.

Ranging from family relationships to friendships and potential employment opportunities, often rooted in a deep appreciation for the country, our findings on the continuation of links to Norway reveal both the prevalence and the diversity of these connections. Personal circumstances, such as family situations and individual experiences in Norway, significantly influenced the sense of belonging and the likelihood of maintaining ties to the country. This underscores the need to consider individual and family dynamics when discussing transnationalism and belonging.

Conclusions: Future prospects of exit among displaced Ukrainians in Norway

Although relatively few displaced Ukrainians have so far decided to leave Norway after being granted collective protection, it is expected that many more will eventually return, both voluntarily and, possibly, involuntarily in the future. People's motivation to leave Norway at the initial stage of integration offers valuable insights and feedback regarding both integration policies and key factors that determine the desire to leave a highly developed welfare society and return to a country still at war – or to make a future in a different country.

Our article has shown the significance of an interplay of individual, structural and policy-related factors in explaining displaced Ukrainians' desire to return to Ukraine. Perceived social obligations to take care of relatives, family members left in Ukraine and the social well-being of children appear to play a decisive role. These factors even outweighed the security concerns and numerous risks to life during wartime, as interviewees also moved back to areas of Ukraine frequently targeted by shelling. Although in many contexts, as shown by Zakirova and Buzurukov (2021), political factors in the home country – especially the cessation of war and security issues – are the most important reasons why refugees return, they were not significant among our interviewees. It is reasonable to assume that this is in part because all of our interviewees were women who are still traditionally 'care persons' in their families and are not subject to military service.

We see that family situation and loyalty play more significant roles in this regard. Our study highlights that some people's decision to return to Ukraine is driven by a sense of duty to their country and a desire to make a meaningful contribution to its recovery and future. These motives align closely with Hirschman's (1970) loyalty concept – a willingness to remain committed to a group or nation despite hardships. In this context, loyalty implies choosing to return rather than pursuing a permanent exit. In our data, this form of loyalty is expressed both as an altruistic concern for others in greater need and as a personal commitment to rebuilding Ukrainian society.

Unlike other refugees, who are often unable to return to their homeland due to political persecution, displaced Ukrainians maintain close connections with their networks in Ukraine and have the possibility of returning to Ukraine with no political restrictions. As such, their belonging to Ukrainian society is more sustained over time. Paradoxically, for some of the displaced people, political motives regarding the war situation were a main reason for returning to Ukraine rather than for staying in Norway. Despite the potential for a better economic situation and greater security in Norway, the desire to support and rebuild a war-torn Ukrainian society and to allocate 'refugee benefits' to those in greater need (such as Ukrainians from the eastern regions or the front lines) influence their decision to go back.

Our study proposes a 'paradox of leaving' that characterises the return and onward migration of Ukrainians from Norway and which should be studied also in the context of emigration from other welfare states. Although the Norwegian healthcare system, with its universal coverage and comprehensive services, could logically be seen as an asset for staying, cultural patterns and familiar approaches to medical treatment from Ukraine in fact contributed to several of our interviewees' decisions to leave. This demonstrates that there are no universally defined and stable factors influencing a decision to stay or leave; rather, subjective perceptions and previous social experiences play a crucial role. Although this paper does not provide a detailed conceptualisation of the 'paradox of leaving', we emphasise that this phenomenon can enhance our understanding of the mismatch between expectations and realities in host welfare societies. It offers insight into factors that influence refugee mobility beyond the traditional push and pull dynamics.

Additionally, the study has shown that certain stereotypes and 'limiting beliefs' prevalent in public discourse and refugee perceptions can significantly hinder integration efforts. In our study, a common belief that 'it is impossible to find a job in Norway' exemplifies this. Stories from our interviewees indicate that this belief was often accepted as a given, discouraging them from even attempting to find employment and thus impeding their social agency and pressing their return to their home country.

From an individual perspective, our study reveals that the traditional dilemma of whether 'to stay or to go' can be far more complex within each family than it would at first appear. One child may thrive in Norway, for example, while another may suffer and desperately wish to return to Ukraine. This highlights the variety and heterogeneity of integration outcomes, particularly concerning children, which complicates each unique case, destiny and life.

Although we should be careful when generalising based on a small number of interviews, an important finding is that Ukrainian refugees who decide to return home or move onwards to another country tend to adopt a transnational approach and maintain multiple attachments even when their stay in the host country has been somewhat brief. Although our study did not focus deeply on unpacking place belongingness (the feeling of being at home for refugees), it provided evidence of 'creating home' in Norway through social surroundings and ties, even in a short-term perspective. We also noted emotional attachments and feelings relating to Norway, Norwegian society and Norwegians in the interviewees' narratives, associated primarily with gratitude towards locals' support and care, which could potentially enhance transnational ties and maintain a sense of belonging at the individual level in the long term. Meanwhile, Norwegian 'politics of belonging' (Antonsich 2010) remain quite controversial, offering displaced Ukrainians opportunities for short-term inclusion into Norwegian society (via the introduction programme and work opportunities) while simultaneously signalling the expectation of return to Ukraine when conditions so permit.

The temporary nature of collective protection and Norwegian policy documents, such as the white paper on the Nansen support programme (Ministry of Foreign Affairs 2024), speeches by Norwegian decision-makers and restrictions on collective protection regulations, indicate that many Ukrainian refugees in Norway may eventually be obliged to return to Ukraine (Aasland 2024). However, our study suggests that this decision may not permanently end their potential continued link to Norway. The social capital gained in Norway, along with the knowledge of Norwegian society and language skills acquired by displaced Ukrainians, could facilitate future labour migration. Ukraine's potential EU integration further enhances the likelihood of such a scenario.

The results of our study provide valuable insights into the 'temporary turn' in contemporary migration and integration policies, where temporary schemes and mechanisms are becoming the new norm. Networking with Norway through a future-oriented lens, considering the social attachments and social capital that Ukrainian refugees established during their short stay, introduces new dimensions to prognoses on future mobility.

Notes

1. Statistics from UDI (the Norwegian Migration Directorate), <https://www.udi.no/en/statistics-and-analysis/ukraina/> (accessed 3 February 2025).
2. Updated figures can be found on the UDI's webpage: <https://www.udi.no/en/statistics-and-analysis/ukraina/> (accessed 3 February 2025).
3. Project webpage, <https://uni.oslomet.no/exitnorway/> (accessed 3 February 2025).

4. Ethical approval of the study with an assessment of processing of personal data was obtained from Sikt (Norwegian Agency for Shared Services in Education and Research), reference no. 261875.
5. In a different project (Hernes *et al.* 2023b), the authors interviewed 47 Ukrainian refugees remaining in Norway. Many of the trends identified among the 8 interviewees in this article are also reflected in these interviews, particularly regarding opinions on the Norwegian healthcare system, labour market and family considerations, thus reinforcing the broader applicability of the study's findings.
6. All Ukrainian refugees who are settled in a municipality are provided with a municipal contact person – or a curator – who is there to assist with various integration issues.

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Two Borders, Two Logics: Future-Oriented Narratives on Migration from Belarus and Ukraine to Poland

Jonathan Scovil* 

The article is focused on the main narratives prevalent in the Polish public debate about migrants arriving at the Polish–Belarusian border and those arriving at the Polish–Ukrainian border. The author seeks to answer the question of why a negative narrative about the former and a positive one about the latter became so popular during the same period and whether, over time, Poles’ attitudes toward refugees from Ukraine may become similar to their attitudes toward migrants from across the Belarusian border. The study is based on focus-group interviews conducted among Poles living in Warsaw, Wrocław, Rzeszów and Łowicz. The collected data were analysed using the theoretical concept of ‘narratives’ adapted for migration studies.

Keywords: Poland, Ukraine, Belarus, migration, refugees, narratives

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Introduction

The early 2020s proved to be a time of immigration for Poland (Duszczyk and Kaczmarczyk 2022). In 2021, hundreds of migrants from the Middle East and Africa began arriving at the Polish–Belarusian border, seeking to cross into the European Union; then, in early 2022, thousands of refugees from war-torn Ukraine began crossing the Polish–Ukrainian border. However, the reaction of the Polish public to these two parallel situations was very different. According to CBOS data, as many as 94 per cent of Poles were in favour of accepting Ukrainian refugees immediately after the outbreak of war (Feliksiak and Roguska 2022), while only 33 per cent were in favour of accepting newcomers from the Polish–Belarusian border shortly after they began appearing there (Feliksiak 2021). What was the basis for such a striking difference in attitudes towards these two seemingly similar situations?

To answer this question, it is necessary to outline the broader context. Firstly, it is worth noting that it was the attitude of Poles towards Ukrainians in 2022 that stood out as exceptional in the recent history of this nation. In turn, attitudes towards migrants¹ from the Belarusian border were in line with a certain trend that was especially observable during the intensity of the 2015–2016 European migration crisis (Babakova, Fiałkowska, Kindler and Zessin-Jurek 2022). At that time, Poland stood out in comparison to other EU countries for its exceptionally negative attitude towards migrants arriving in Europe mainly from Africa and the Middle East (Cutts, Goodwin and Raines 2017) and thus from similar regions as contemporary migrants from the Polish–Belarusian border.

However, today's situation is significantly different to that of 2015–2016. Poland and the EU authorities are now accusing Kremlin-backed Belarus of organising the smuggling of Middle Eastern and African migrants onto its territory and then allowing them to illegally cross EU borders (European Commission 2021). In public and political discourse, these differences were further emphasised by reports suggesting that some individuals crossing the Belarusian border were not typical asylum-seekers but persons with criminal records or ties to foreign security services. According to official statements, Polish Border Guard officers were repeatedly attacked with stones and other objects (Muraszkiewicz and Piotrowicz 2023; Polish Border Guard 2021). This situation was frequently framed by state actors as a form of 'hybrid warfare' involving the strategic instrumentalisation of migration. At the same time, some people at the border were, in fact, vulnerable individuals in need of humanitarian assistance – including families with children – which made the situation ethically and politically complex. The reaction of the Polish public, however, was clearly defensive.

Given the images from the fortified, closely guarded Polish–Belarusian border, the scenes from the Polish–Ukrainian border may have seemed a striking contrast even though they came from the same country and in the same period. The initial scale of Polish assistance to refugees from Ukraine was unprecedented and significantly distinguished Poland from other big EU countries like Germany and France or Ukraine's other neighbours. During the first month of the war, Poland received and provided immediate assistance to more than 2 million refugees (Grabowska and Pięta-Szawara 2023). During the first three months, the total value of aid provided by the Polish authorities and ordinary citizens was equivalent to almost 1 per cent of Poland's GDP (Baszczak, Kiełczewska, Kukołowicz, Wincewicz and Zyzik 2022). Despite the deep polarisation of the Polish political scene, helping Ukrainians united Poles across everyday divides (Kalinowska, Kuczyński, Bukraba-Rylska, Krakowska and Sałkowska 2023). Moreover, it was not only the government, local governments or third-sector organisations but also ordinary Poles who became involved in helping. Shortly after the outbreak of war, as many as 68 per cent of Poles claimed to personally help Ukrainian refugees financially or materially (Feliksiak and Roguska 2022) and the number of similar declarations remained close to 50 per cent until the end of

the year (Scovil 2023a). Tens of thousands of Ukrainian refugees were picked up from the border by ordinary Poles in their cars and hundreds of thousands ended up not in refugee camps but in the private homes of Polish citizens across the country (Wojdat and Cywiński 2022).

What made Polish society welcome the Ukrainians with such openness and solidarity when, at the same time, it remained largely indifferent to the fate of migrants from across the Belarusian border? Are these factors permanent or merely incidental? In recent years, an increasing number of scholars, as well as international organisations, NGOs and governments, have emphasised that one of the most powerful factors shaping societies' attitudes towards migrants is the narratives told about them (Dennison 2021; McVeigh 2018; OHCHR 2020). Guided by this assumption, we should seek answers to the question posed above in this very area, looking for fundamental differences between the most prevalent narratives describing these two so-differently-perceived migrant groups in the Polish public debate, as well as analysing how they may have changed over time.

CBOS poll results show that, in 2023, after a period of spontaneous solidarity immediately after the outbreak of the war, Poles' attitudes towards refugees from Ukraine began to deteriorate, with the percentage of respondents supporting their admission falling by more than 40 percentage points by the end of 2024 (Scovil 2024a). The research presented in this article was conducted precisely at the moment when Poles' discouragement towards Ukrainians was becoming more pronounced – i.e. in the summer of 2023 – on the wave of the so-called 'grain crisis'. This was related to the uncontrolled influx of Ukrainian grain on the Polish market (Jastrzębiec-Witowska 2023) and other events straining Polish-Ukrainian relations, like the Ukrainian missile explosion in Polish Przewodów. At the time, a different, much more negative narrative about newcomers from Ukraine was emerging. This article attempts to identify its core elements and some of the reasons behind its rise in popularity and to compare it with the negative narrative about migrants from across the Belarusian border. Such analysis allows the question to be posed as to whether the spectacular manifestations of Poles' solidarity with Ukrainian refugees at the beginning of the war were merely a temporary deviation from the aversion to outsiders shown in 2015–2016 or whether there were more-permanent factors behind them finding expression in the most widespread narratives in society.

A central interpretive focus of this article lies in the future-oriented dimension of the narratives. Beyond simply describing the present or recalling the past, many participants articulated expectations, hopes and fears concerning the presence of migrants in Poland. These visions of the future – whether they imagined threat, integration, dependency or social enrichment – played a crucial role in shaping respondents' current attitudes and moral judgments. This temporal projection functioned not only as a justification of their views but also as a framework for distinguishing between the two border situations.

Previous research

Narratives concerning refugees from Ukraine and migrants from across the Belarusian border have previously attracted considerable scholarly attention. Recent studies have examined how public discourse constructs a distinction between 'real' and 'fake' refugees (Zessin-Jurek 2022) and how the media framed some categories of migrants as 'illegal' (Pietrusińska 2022a). Scholars have also analysed state securitisation strategies² and the political framing of the border situation (Adam and Hess 2023). Studies referring to securitisation processes have focused on the narrative created by the government of the right-wing Law and Justice party (PiS), showing its political function in the run-up to the 2023 parliamentary elections in Poland (Nitszke 2023) or reconstructing (with the help of framing analysis) the image of the

migrant as a 'criminal' or 'barbarian' in the media controlled by the government (Jas-Koziarkiewicz 2023). Nevertheless, it is worth mentioning that the 2023 elections were won by a liberal coalition of political groupings led by the Civic Coalition; however, once the government was formed, it adopted the same securitisation narrative and, in some respects, even sharpened their approach, e.g. suspending temporarily the right to asylum for migrants arriving on the Polish–Belarusian border. In turn, the attitude of the general Polish public towards migrants from the Belarusian border became worse than ever (Scovil 2024b).

Some studies also pointed to the existence of two competing narratives about the Polish–Belarusian border crisis. In addition to the securitisation narrative, which was dominant and supported by the government media (especially TVP), a positive narrative was also mentioned, disseminated by the left-wing, anti-government media (especially TVN), as well as by NGO workers and activists involved in helping migrants. It referred to compassion-based solidarity, portraying migrants in a more individualised way (Kawecki 2024; Pietrusińska 2022b), at the same time often lacking reflection on broader geopolitical or security-related concerns. Moreover, in some cases, the humanitarian framing also seemed to align with political agendas – particularly in contexts where aid work became a form of public performance or a way of expressing opposition to government policy (Kosman 2024). The analyses showing the conflicts between a security-centred and an emotional, individualised approach to migration suggest the existence of some enduring narratives about migrants reappearing in Polish public debate at different times, as the division they describe was also present in analogous analyses of the public debate around the time of the migration crisis of 2015–2016 (Bertram, Puchejda and Wigura 2017; Kotras 2016).

On the other hand, existing research on the narratives around refugees from Ukraine who began arriving in Poland after the Russian invasion in February 2022 focused mainly on the positive narrative which, indeed, very clearly dominated the Polish public space during the first months (Hargrave, Homel and Dražanova 2023). This positive narrative about Ukrainians was often juxtaposed with the negative narrative about migrants from across the Belarusian border, as both were prevalent in Polish society and supported by the Polish government in parallel. The differences in narratives were, moreover, translated into concrete practices and legal solutions – people who entered Poland from Belarus were often detained in very difficult conditions, were not given access to a fair asylum procedure and were forcibly returned to their home countries (Amnesty International 2022; Klaus and Szulecka 2023).

Research points to polar opposites in the narratives of the government and many Polish media on migrants from across these two different borders, indicating the effect of othering and labelling practices leading to the construction of a division into 'good' and 'bad' migrants, the former defenceless and in need of help, the latter dangerous and requiring repulsion (Grabowska 2023; Liszkowska 2023). These divisions were reinforced by media 'echo chambers' (Szylo-Kwas 2023; Zessin-Jurek 2023a) – with both pro-government and liberal outlets framing events in ways that aligned with their political agendas rather than fostering broader societal reflection on humanitarian concerns. Researchers also drew attention to an interesting gender dimension of this division: it was mostly women with children who came to Poland from Ukraine, fitting into the social image of the defenceless and weak 'real refugee', while media coverage of both the migration crisis of 2015–2016 and 2021 portrayed the newcomers seeking refuge in Europe primarily as strong young men, not arousing sympathy and automatically fitting into the image of the 'invader' (Bloch 2023; Hargrave *et al.* 2023).

Over time, analyses of negative narratives about Ukrainians living in Poland also emerged, as these gained popularity in both traditional and social media (Grzesiczak 2023). Far-right groups made early attempts to exploit the complex and often difficult Polish–Ukrainian historical relationship (Zessin-Jurek

2023b) or fuelled a moral panic around the perceived threat of Poland's 'Ukrainisation' (Demel 2023; Mazurkiewicz and Sygnowski 2024). This article aims to complement the research discussed here by analysing the functioning of both positive and negative narratives about Ukrainian migrants among ordinary Poles, juxtaposing them with analogous narratives about migrants from across the Belarusian border. Comparing their constructs will allow us to grasp the key elements that translated and still translate into different attitudes of Poles towards these two situations.

This article contributes to the existing literature by focusing on a relatively underexplored element in migration studies: the visions of the future held by receiving-society members regarding migrant groups. While some research has examined how migrants themselves imagine their future trajectories (see e.g. Pedersen 2024; Pine 2014), less attention has been paid to how such future imaginaries are constructed by host populations. These prospective imaginaries – whether optimistic, fearful or ambivalent – play a crucial role in shaping attitudes and help to explain both the durability and the transformation of dominant narratives over time. By comparing such visions across two distinct contexts, this article provides fresh insight into the deeper narrative structures underlying public opinion in Poland.

Theoretical framework and research methodology

The theoretical basis for the research presented in this article was the concept of 'narrative' as described by James Dennison in his meta-analysis on narrative research and its application in migration studies (2021). In his work, he defines narratives as 'selective depictions of reality across at least two points in time that include one or more causal claims' (Dennison 2021: 3). Narratives are thus the most often a description of the causal relationship between some past event (starting point) and the present – representing its outcome to some degree. For example, a negative narrative about the migration crisis of 2015–2016 interpreting it as a Muslim 'invasion' of Europe could link it to a source event, which could be the EU's overly liberal migration policy. However, as Dennison notes, narratives also often contain a third, crucial point in time: a vision of the future to which the outlined causal sequence could or should lead. Moreover, narratives always carry a normative element, a distinction between negative and positive events, a key division of the characters into 'heroes', 'villains' and 'victims' (Jones 2010), as well as some 'moral' or lesson of an ethical nature that can be drawn from the events thus depicted.

Behind the notion of 'narrative', there is also the assumption that the creation and choice of narratives is something inevitable and universal for all people, which is enforced by the disproportion between the limited cognitive capacities of humans and the almost infinite complexity of the world around them (Dennison 2021). The same narrative patterns, moreover, are normally used by the same people to explain different phenomena, acting as a kind of tool to order the chaos of reality. What determines that some narratives become more popular in society than others? Dennison lists several groups of factors. Firstly, what matters is, of course, the congruence of a given narrative, both internal and external – i.e. the extent to which the narrative agrees with the publicly available information about the reality being described at the time. Secondly, behind the popularity of a particular narrative in a given social group may be the interests of that group. Thirdly, a narrative is likely to become popular if it fits in with the pre-existing perceptions of the world of large social groups, with particular reference to their self-perceptions – a popular narrative should confirm them or at least not threaten them (Dennison 2021).

Speaking of the general correspondence between narratives and their adherent's pre-existing ideas, it is worth noting the striking similarities between the concept of 'narrative' and the concept of

'worldview' or 'cosmology' used especially in social anthropology (Descola 2005; Stoczkowski 2019; Viveiros de Castro 1999). They, too, constitute universal intellectual tools for dealing with the complexity of reality, containing a fixed axiology, an ontology (i.e. assumptions about the general properties of the world and the entities that inhabit it), an etiology (i.e. assumptions about the sources of these properties) and, finally, a soteriology, outlining a vision of the radical healing of the reality described (Stoczkowski 2005). It can be said that narratives, corresponding to visions of the world with their construction, are often their emanations – interpretations of particular phenomena derived from the foundations of a given worldview (Wilson 2005). For example, the aforementioned narrative interpreting the migration crisis of 2015–2016 as a Muslim 'invasion' of Europe and linking it to the irresponsible policies of the European Union fits easily into a broader conservative worldview that inscribes the liberal EU migration policy into a more general image of a 'rotten West' steeped in leftist ideologies and 'militant Islam', whose adherents seek to 'Islamise' Europe at all costs. In my research, I focus on analysing narratives around specific migration issues but it is worth bearing in mind that why a particular narrative is used by a particular person is often determined precisely by its compatibility with that person's professed more-general and fundamental worldview, from which the narrative may draw its juices (Dennison 2020; Oatley 1995). The idea that narratives reflect and reinforce broader worldviews is echoed in empirical work on Polish migration discourse, where seemingly spontaneous popular beliefs are often deeply entangled with broader cultural-political frames (Grabowska 2023; Zessin-Jurek 2022).

I looked for the basic elements of such narratives in the qualitative data collected in the focus-group interviews. As they were conducted at a turning point in Polish–Ukrainian relations, they were particularly focused on exploring narratives about refugees and migrants from Ukraine, which is reflected in the construction of the research sample. However, the motif of the Belarusian border was also strongly present in all the interviews and was a constant point of reference. The sample consisted of 8 focus groups of 6 to 8 Poles with varying levels of education and socio-professional status. Half of the groups comprised young people (20–30 years old) and the other half older people (50–65 years old), as nationwide surveys have shown that one of the most significant socio-demographic variables differentiating attitudes towards refugees or migrants is age – younger Poles were generally less supportive of them than older Poles (Feliński 2021; Scovil 2023a). One interview was conducted with the younger group and another with the older group in each of the four selected cities: Warsaw, which received the largest number of Ukrainian refugees (Poland's Data Portal 2024); Wrocław, which has a particularly large number of Ukrainians in relation to the city's total population (Sobestjańska and Sopińska 2022); Rzeszów, a large Polish city near the border with Ukraine, which has been the centre of many ongoing events in Poland since the outbreak of the war; and Łowicz, a small city of fewer than 30,000 inhabitants, which was chosen for contrast, on the assumption that residents of small cities may have different experiences that are worth including in the study. In all groups, the discussion followed the same scenario and usually lasted about 2 hours.

The collected material was analysed using a qualitative approach inspired by grounded theory methodology. The analytical process began with open coding aimed at identifying recurring themes and expressions in participants' statements. These initial codes were then grouped into broader thematic categories, which were interpreted as elements of socially shared narratives. Following this bottom-up phase, the material was re-examined using an analytical framework derived from Dennison's (2021) work on migration narratives. Specifically, each narrative was broken down into its temporal structure (past–present–future) and the identification of its key figures: 'heroes', 'villains' and 'victims'. This combined approach made it possible to capture both the emergent structure of public attitudes and the

rhetorical strategies through which migration-related events were made intelligible by participants. The analysis focused not only on what was said but also on how certain positions were framed, justified and emotionally charged in group settings.

Ethical considerations and methodological limitations

The study was conducted in accordance with the principles of research ethics. Participation in the focus-group interviews was entirely voluntary and all participants provided consent after being clearly informed about the study's purpose, the procedures involved and their right to withdraw at any time. As a token of appreciation for their time and involvement, participants received a modest financial compensation. All data were anonymised during transcription and analysis to protect the confidentiality of the participants. Participants were recruited with the assistance of a professional research agency and were selected to reflect variation in age, education level and socio-professional background. While this approach ensured a degree of diversity, the sample was limited to urban residents, which may have influenced the range of perspectives captured. Moreover, focus-group dynamics may have introduced elements of social desirability or conformity bias, particularly in relation to politicised topics such as migration. These limitations are acknowledged and taken into account in the interpretation of findings.

Taking all of this into consideration, we can argue that the use of FGIs was particularly well suited to the objectives of this study. The aim was not to measure individual attitudes in a statistically representative way but to explore how people collectively construct meanings around migration in a socially dynamic context. Focus groups provide access to naturally occurring group-level discursive processes, allowing researchers to observe how people negotiate, reinforce or challenge dominant narratives in interaction with others (Barbour 2007). This is especially valuable in research on politicised and morally charged topics, where group dynamics often reflect broader public debates. Moreover, focus groups are especially useful for capturing ambivalence, contradictions and negotiated positions, which frequently emerge in spontaneous discussion but which may remain hidden in individual interviews or surveys. As Morgan (1996) notes, focus groups enable the researcher to uncover not just what people think but how they think together, making them ideal for tracing the narrative contours of public opinion.

Narratives around the situation on the Belarusian border

Starting point

Both positive and negative narratives on the situation at the Polish–Belarusian border referred to the same point in the recent past, describing its origins in a rather similar – at a basic level – way: the influx of migrants to the Belarusian border was the result of a deliberate policy of the Belarusian authorities to bring people from the Middle East and Africa wanting to enter the EU and encourage them to cross the border illegally. Generally speaking, these actions were intended to destabilise the EU's eastern borders. Our interlocutors repeated the widely used media slogan of a 'hybrid war', waged by Kremlin-backed Belarus against the EU and of which migrant smuggling was supposed to be an important element. On these basic outlines of the situation, as the vast majority of interviewees agreed, such a vision was presented not only by the Polish government but also by the authorities of the EU (European Commission 2021).

Clear differences, however, were already marked in the socio-demographic characteristics and intentions attributed to the newcomers themselves. In the negative narrative, they were portrayed primarily as dangerous. It was emphasised that they were predominantly young, strong men: 'They are young men. The case of mothers or children was sporadic (...) You see such a young buck at the border, he has a mobile phone, what is this?' (Warsaw, 50–65 years old). In this citation, one can easily recognise a pattern already present in the negative narrative on Middle Eastern and African migrants coming to Europe in 2015–2016 (Bertram *et al.* 2017; Hargrave *et al.* 2023). At that time, the male gender of the arrivals, their youth and their threatening physical strength were also emphasised. The distinctive motif of the mobile phone is also worth noting. It complements the vision of the threatening migrant with an element indicating that he does not need help at all – not only are the people arriving in Europe young and able-bodied (and therefore can easily cope with whatever it is they are fleeing their countries from) but they also have new, expensive phones, indicating that they are in a relatively good material position. The religion of Islam, attributed to most or all migrants, also played a key role in the negative narrative, triggering a range of negative associations and further reinforcing the image of newcomers as a threat:

Over there, children are taught from a young age to walk around with rifles and now imagine what will happen here. (...) We have the right to demand from our government, from those who govern, that they ensure our safety so that I don't have to be afraid of refugees, install bars in windows, make entanglements. (...) They will murder Poles in the name of Allah (Wrocław, 50–65 age group).

Muslims were associated with terrorist attacks, a general increase in crime or simply the threat of physical violence. However, there was also concern about the 'cultural threat', especially the forced conversion to Islam: 'Islamists want to convert us. And that is the problem' (Rzeszów, 50–65 age group). Here, too, the narrative overlaps in essential elements with the anti-immigrant narrative of 2015–2016, when the influx of migrants to Europe was described as an 'Islamic invasion' or 'jihad' (Bachman 2016; Bertram *et al.* 2017; Szałańska 2020).

Finally, in the negative narrative about the situation on the Belarusian border, newcomers were also attributed with 'wrong' motivations, again distancing them from the image of people deserving help. In addition to the will to convert Europeans to Islam, they were said to have financial incentives: 'They only treat our country as a transit country, because they want to go to other countries where there are allowances' (Wrocław, 50–65 age group). Significantly, they were said to not even want to earn better wages in rich Western countries but to count on welfare benefits – which, again, fits in with the image of the 'social jihad' forged in 2015–2016 (Bertram *et al.* 2017). The aversion was undoubtedly reinforced by the assumption that the poorer Poland, which does not offer such high allowances, is merely a 'transit country', rather than an attractive destination in itself.

The negative narrative also included a motif that was absent in 2015–2016: among the young menacing men of Muslim faith, there were also said to be 'Russian agents' who wanted to enter Poland to sow chaos there. Reconstructing the basic normative layer of this narrative, we can conclude that the role of 'villains' was played by both migrants and the Belarusians behind them and, to an even greater extent, by the Russians pulling the strings. Poles, on the other hand, played the role of 'victims' of the Kremlin's deception.

In the positive narrative, newcomers from across the Belarusian border are presented with sometimes polar opposite characteristics and different motivations. Above all, they are spoken of as women rather than men. As one young Pole from Wrocław said: 'In my opinion, we should also give them some help. They are also people, they are also women' (Wrocław, 20–30 age group). This again

shows how important a role the gender dimension plays in arousing social sympathy (Hargrave *et al.* 2023). Women are, in this case, more 'human' and therefore worthy of humane treatment. Unlike menacing, more 'animalistic' and unpredictable young men, they are presumed to have a vulnerability which, on the one hand, is more in keeping with the image of the 'victim' and, on the other, does not allow them to be associated with any real threat.

Due to this narrative's vision of newcomers as primarily vulnerable women (often with young children), their motivations seem inherently honest, as they fit into the image of someone seeking help or a haven. Although, as mentioned at the beginning, adherents of the positive narrative shared the belief that an unfair, suspicious practice of the Belarusian authorities was behind the appearance of migrants at the border, at the same time they emphasised that these persons fell into a kind of 'trap' and were completely unaware of the game into which they had been drawn. Despite being caught up in the harmful proceedings of the Belarusian-Russian 'villains', the migrants thus remained innocent 'victims'. On the other hand, the category of 'villains' was partly joined in this narrative by the Poles themselves, who were insensitive to the abuse of people seeking help.

The present moment

Let us now turn to a description of the second point on the timeline of both narratives, i.e. the present moment. The negative narrative is dominated by the image of a border defence against the onslaught of Muslim migrants. It corresponds, additionally, to the image of Poland as 'the bulwark of Christendom' defending Europe against the world of Islam, which is firmly rooted in the Polish imagination – this metaphor became popular during the Polish clashes with the Ottoman Empire in the 16th and 17th centuries but never quite left the national consciousness (Tazbir 1973, 1987). The figure of the 'victim' (Poles) and the 'villain' (migrants, Belarusians, Russians) is now joined by the figure of the 'hero', which includes border guards and soldiers. This image was further reinforced after the time of the survey when, in the summer of 2024, a young Polish soldier was killed on the border (Kacprzak and Zawadka 2024).

The positive narrative, on the other hand, emphasised the individual fate of the newcomers, countering their collective treatment and trying to free them from the context of the 'hybrid war' or their ethnic and religious identity and to present them simply as people in need. In this narrative, the figure of the 'victim' (migrants) and the 'villains' (Belarusians and Russians of course but, actually, the 'insensitive' Poles come to the fore here) is also joined by the figure of the 'hero', in which the volunteers who help the migrants fit in. An excellent illustration of this narrative was Agnieszka Holland's film *Green Border* (2023), in which volunteers acting in defiance of the state authorities are portrayed as unambiguously heroic, while the role of 'villains' is played by border guards – both Polish and Belarusian – as well as ordinary Poles who are insensitive to the injustice suffered by migrants. The migrants, on the other hand, are presented without exception as good, sincere and often well-educated people. In the focus interviews which we conducted, these two narratives – the narrative of defence of the border and the narrative of compassion – often clashed, leading to strong emotional outbursts on both sides:

- *If I were the minister of the army, I would order them to shoot.*
- *But there are mothers with children there too...*
- *These are just soldiers in uniform, in women's bodies. They are soldiers.*
- *What about the children?*
- *Also. If one or the other died, the third one would think twice (Rzeszów, 50–65 age group).*

In the above quote, we see the kind of rhetoric into which the basic assumptions of both narratives were translated. The proponent of the positive narrative tried to 'humanise' the migrants, stripping them of any particularities or context of events and painting an image of a mother with children lost in the forest between Poland and Belarus, evoking universal sympathy and a desire to help. The proponent of the negative narrative did the exact opposite – dehumanising migrants, reducing women to 'soldiers in women's bodies' (simultaneously masculinising their image), refusing to look at them outside the context of the 'hybrid war' and calling for the extremely brutal treatment of them. It is important to mention that, in addition to the two dominant narrative positions, some respondents expressed more ambivalent or internally conflicted views that did not fit neatly into either category. For example, they acknowledged the difficult situations faced by migrants, while simultaneously voicing concern about the state's ability to maintain control – or expressing doubts about the motivations of those arriving. However, the logic of the dispute has always ultimately pushed them into the rhetoric of one narrative or the other.

Vision of the future

As the rhetoric of the representatives of the positive narrative was based on abstracting from the broader political context and the particularities of migrants, it also did not contain a clear vision of the future, calling, instead, for acts of compassion 'here and now'. This was quite different in the case of the negative narrative, in which the vision of a potential future – the third point on the narrative timeline – to which the events described could lead was quite elaborate. If Poland failed to stem the influx of migrants, it would not only face chaos and an increase in crime but the very identity of Poles would be threatened. Examples of the unsuccessful integration of migrant communities in Western Europe served as a negative reference point and the image of demographic 'domination', which would involve the replacement of the country's indigenous population by a rapidly growing group of Muslims, also recurred:

Muslim women do not have one child but a minimum of three, this is their Muslim doctrine. Muslims have flooded France. A French woman will give birth or not, one child and that's it. Soon there will be an even bigger increase of Muslims, there will be more of them than native Frenchmen and this is happening because they don't want to join the Christian civilisation or any other and they are promoting their culture. (...) Just like in Germany, there are 7 million Turks, so they can set up a state within a state. (...) In France, there are not only Turks but also Sudanese, Libyans, Moroccans and it's almost 40 per cent of the population now. Two or three decades and they will already be on a par (Warsaw, 50–65 age group).

Of course, our interviewees' estimates were greatly exaggerated – in France, for example, the Muslim community makes up not 40 per cent but around 10 per cent of the country's population (Insee 2023). This kind of exaggeration is, however, very characteristic of people who fear Muslim immigrants, as shown, for instance, by measurements of the so-called 'ignorance index' conducted by the British centre Ipsos MORI (2016). Meanwhile, the motif of 'demographical dominance' resembles once again the narratives of 2015–2016, when opponents of the admission of Middle Eastern and African migrants claimed that the newcomers were unusually lustful and eager to reproduce (further reinforcing the dehumanising, animalistic image of strong, menacing young men), sometimes calling it a 'sexual jihad' (Bertram *et al.* 2017).

In conclusion, the negative narrative about the situation on the Belarusian border had a clear advantage over the positive narrative in that it had an elaborate vision of the future. As I will argue further, it is the visions of the future contained in the narratives that play a key role in sparking the imagination of their audience and followers. A narrative that is devoid of such an explicit vision will usually tend to be less compelling to broad publics. The absence of such a vision also points to significant flaws in the construction of the narrative as a whole, resulting from the escape from broader reflection on geopolitical and security issues.

Narratives around the situation on the Ukrainian border

Starting point

The positive and negative narratives on the influx of Ukrainian refugees to Poland also started from the same point in the past – February 2022 – describing the origins of the current situation in an even more similar way. As mentioned in the introduction, immediately after the Russian invasion of Ukraine, the reception of refugees from these regions was supported by 94 per cent of Poles (Feliński and Roguska 2022) and, for a brief moment, there was virtually no room in the Polish public space for separate narratives on the ongoing events. Our respondents' accounts of the first weeks of the influx of Ukrainian refugees were also very consistent with each other, forming a single, coherent story. What were its recurring themes?

Firstly, in every focus group, respondents expressed satisfaction and pride in how Polish society reacted to the influx of Ukrainian refugees in the first weeks after the outbreak of war. It was often emphasised that the Poles behaved exactly as they should have behaved. The metaphor of a well-passed exam kept recurring: 'We passed the exam with a five (Rzeszów, 50–65); 'We, as citizens, ordinary people, passed the exam' (Łowicz, 50–65 age group). Some respondents also admitted that the reaction of Poles to the event came as a (positive) surprise to them, as it conflicted with their self-perception as an intolerant, closed-minded nation, as well as a divided and uncooperative one.

When asked what was behind such a vivid reaction from Poles, respondents often spoke of a spontaneous moral impulse, a simple empathy towards people who were fleeing death: 'We did not help the Ukrainians, we helped people in need' (Wrocław, 50–65). This abstraction from the context and the particularities of the people who were helped brings to mind the pattern that was present in the positive narrative about people from the Belarusian border. Just as, there, the role of the 'heroes' of the narrative was played by volunteers helping 'people in need' and thus fulfilling an obvious moral duty, here the category included virtually all Poles, millions of whom helped Ukrainians in one way or another.

Respondents often emphasised that it was 'ordinary people' – such as themselves – who spontaneously threw themselves into helping, rather than, for example, the Polish state: 'First of all, no one waited to see if something would be done top-down, everyone went on the spot, everyone helped as much as they could' (Rzeszów, 50–65). Our interviewees also liked to emphasise that Poles stood out for the scale of their aid compared to other European nations: 'They debated in the European Parliament what it would look like if a country was attacked and how to help it and Poland showed them how to do it. They debated for a good few years and didn't know how' (Rzeszów, 20–30). The respondents also drew satisfaction from the fact that they had proved to be 'better' than the Western states, which are often cited in the Polish public debate as a certain model for the country. This time it was to be reversed; it was the Poles who showed Western Europeans 'how to do it' and aroused the admiration of those they

often admire themselves. As an elderly resident stated: 'Everyone was amazed, the whole world was amazed by us' (Łowicz, 50–65 age group). Thus, as we can see, the image of ordinary Poles as 'heroes' was very much anchored in both positive and negative narratives around the influx of refugees from Ukraine.

As for the Ukrainians, at this point they fitted perfectly into the narrative model of the 'victim' – predominantly women with children coming from a Slavic and Christian culture that was 'non-threatening' to Polish identity. There was also no doubt that they were fleeing Russia's aggression; no one suspected them of any dealings with the 'villain', as was the case with the people from the Belarusian border, who were accused of knowingly taking part in a 'hybrid war', smuggling Russian agents into their ranks, etc. Ukrainians inscribed themselves all the more firmly in the role of 'victim' as they experienced aggression from one of the main 'villains' in Polish history, experiencing something that Poles themselves had experienced in the past:

Poles are very attached to history, a lot of this patriotism is instilled in us, we are also taught about our Polish martyrdom. So, a lot of people feel attached to our history and also empathise with what these people from Ukraine went through (Rzeszów, 20–30 age group).

In a sense, the events of February 2022 were not entirely new to Poles and immediately fell into a deeply rooted interpretative pattern, passed on from generation to generation. Just as Russia had been the 'villain' before, the Ukrainians easily fitted into the role of 'victim' occupied by the Poles in Polish martyrdom, which was made possible by both a commonality of experience and a certain basic cultural proximity.

The present moment

The positive and negative narratives begin to diverge significantly in the description of the second point on the narrative timeline – the present. The status of the Ukrainians, in particular, becomes contentious: are they really 'victims' or are they also a kind of 'villain'? For, as time passes, Ukrainians cease to be seen as abstract and featureless 'people in need'; they are equipped, in the negative narrative, with several concrete characteristics. In particular, attention is drawn to those traits that make Ukrainians start to fall short of the conventional image of the war refugee. Their affluence and, in some cases, even richness, manifested in expensive clothes or luxury cars, was the most often mentioned in this context (see also Babakova *et al.* 2022):

There were these mothers crossing the border with children in their arms and everyone wants to cry when they see a child being harmed but, let's face it, rich people came here, with a lot of money, contacts, bought flats here, moved around in fancy cars (Wrocław, 50–65 age group).

In the above quote, there's the characteristic opposition between 'mothers with children' and 'rich people' – one can imagine a wealthy mother fleeing a war-torn country with her children but she just does not fit into this ideal image of a war refugee (and therefore into the narrative role of 'victim'). As we remember from the analysis of the negative narrative about newcomers from the Belarusian border, young men do not fit into it even more strongly. Thus, for many respondents, every young Ukrainian man they encountered in Poland was further evidence that they were dealing with a kind of fraud: 'But also, lots of guys built like tanks came here and stay' (Wrocław, 50–65); 'The media talks about heroic

defence and here we see young guys on the streets' (Warsaw, 50–65). In reality, there were virtually no adult men among the Ukrainian refugees arriving in Poland due to Ukraine's ban on their leaving the country (Chmielewska-Kalińska, Dudek and Strzelecki 2023) and the scale of their presence in Poland was significantly exaggerated by proponents of the negative narrative, in a similar way that the negative narrative about people from the Belarusian border exaggerated the proportion of Muslims in Western Europe.

It was not only certain socio-demographic characteristics that would distance Ukrainians from the role of 'victims' but also their attitude. Respondents often accused them of being demanding and ungrateful for the help they received. The prevalence of such an image is also indicated by more recent research conducted for the Mieroszewski Dialogue Centre on a nationwide sample (Mazurkiewicz and Sygnowski 2024). Many of our respondents felt that their state allocates millions to help people who are often in a much better financial situation than themselves but who cynically take advantage of the opportunity. It is worth noting that this attitude not only distanced Ukrainians from the image of the 'victim' (and brought them closer to the 'villain') but also ridiculed the Poles' sacrifice from the 'starting point' of which they were so proud. The Poles were increasingly transforming from 'heroes' into 'victims'.

Many respondents claimed that Ukrainians represent unfair (because favoured by the state) competition for Poles in various fields: in the labour market, the housing market and even in access to public services such as health care. As one resident of Rzeszów's 50–65 age group recounted:

In every office there are signs saying: 'Ukraine, Ukraine'. I approached the lady and said: 'Well, what about us? Should we wait in line?' A lady from Ukraine came – a young girl – and she was accepted in 3 minutes because she is from Ukraine – and I have to wait? Is that how you treat your own citizens?

These were fairly widespread sentiments – as data from the Migration Policy Centre shows, around four in ten Poles agreed with the statement that the Polish government treated Ukrainian refugees slightly or much better than them (Dražanová and Geddes 2022). This provided highly conducive grounds for the popularisation of a negative narrative. Research from other countries demonstrates that the spread of the perception of the preferential treatment of refugees is often a primary factor leading to the rise of anti-refugee sentiment (Hargrave, Mosel and Leach 2020; World Vision 2022).

The theme of rivalry between Poles and Ukrainians recurred also in the interesting context of romantic relations, as there were particularly many young women among the refugees. They aroused some concern among young Polish women, as the following statement shows:

Ukrainian girls, I'm not saying all of them but most of them, are so much more confident, while we, as Polish women, are very insecure. And it's even the Ukrainian girls themselves who say that they invest in themselves, in their looks, in all that and, because of that, they demand more from others around them. (...) In general, the way they walk, the way they dress (Wrocław, 20–30 age group).

Perhaps competition in this field – combined with competition in the labour market, e.g. in the beauty industry – would explain the particular reticence of young Polish women towards refugees from Ukraine that was observed in surveys (Scovil 2023b; Theus 2023). Interestingly, some studies showed that, during the 2015–2016 migration crisis, it was Polish men who were more reluctant to accept migrants from the Middle East and Africa than women (Flis 2016). As men, in turn, dominated among this group of migrants, these results suggest that perhaps somewhat similar mechanisms were at work here.

In the negative narrative about Ukrainians, there were also themes similar to those of the negative narrative about newcomers from the Belarusian border: Ukrainians were to contribute to the increase in crime, did not integrate and disrupted public order. At this point in the narrative timeline, Russians remain the 'villains' of course but recede into the background (as does the context of the war itself), again not unlike the narrative about people from the Belarusian border. The main 'villains', around whom the narrative focuses and to whom it assigns the most attributes, become the newcomers themselves.

Let us now return to the positive narrative and its description of the present moment. There are far fewer re-evaluations here in relation to the starting point – Ukrainian refugees remain the narrative 'victims' and Russians the main 'villains' – the context of war also remains more present here. The role of Poles as 'heroes' is challenged to the greatest extent. Many respondents noted that, after the initial acts of solidarity, the Poles were becoming increasingly closed and less willing to help. They compared this sometimes to the attitude of Poles towards Middle Eastern migrants as far back as the migration crisis of 2015–2016. One Warsaw resident saw the change in Poles' attitude towards Ukrainians as an unpleasant return to the 'norm' and a confirmation of her fears:

I thought then that, if some time ago, we didn't let Syrians into Poland, we would only let in some families who really need to escape and that this would end. (...) I thought to myself that it would return to normal in a moment. (...) This euphoria lasted for three months (Warsaw, 50–65 group).

Advocates of the positive narrative about Ukrainian refugees were, of course, confronted with reports of problems caused by these latter in Poland, as highlighted in the negative narrative. However, they generally considered the scale of these phenomena to be exaggerated and sometimes considered them to be fictional. For example, one interviewee from Rzeszów countered the opposing side's accusation that Ukrainian refugees are rich not by trying to prove that there are no wealthy people among them but by showing that it's not an argument against helping them: 'I believe that, regardless of wealth, if a person comes here, needs help, then we should help her. If it's just housing because she needs peace, well, I try to do my best to meet her needs. Because rich people need peace too' (Rzeszów, 50–65).

At this point, the 'heroes' of the positive narrative are, above all, the Ukrainians fighting bravely at the front, as they had already managed to prove their worth on the battlefield. At the same time, the positive narrative includes a motif of interest more frequently – by defending themselves against the Russians, the Ukrainians are pushing back the threat of a Russian invasion of Poland and it therefore pays to support them by also helping their refugees: 'If we don't help, well, the Russians will be in Warsaw. It's a no-brainer, Putin and his crew are desperate people' (Warsaw, 50–65).

Vision of the future

Finally, let us look at the third crucial point on the narratives' timeline, i.e. the visions of the future. In the negative narrative, the long-term presence of Ukrainians in Poland was said to potentially lead to many economic, cultural and political problems. It was emphasised that the influx of refugees was a burden on the country's economy and especially its social-security system. There were also claims that, as time goes by, Ukrainians will become more competitive in the Polish labour market and, just as they are currently mainly doing simple, low-paid jobs, they will start to displace Poles from better-paid jobs: 'They will speak better Polish and will steal jobs from many Poles' (Wrocław, 20–30 age group). Some respondents also spoke of the threat posed by the spread of the nationalist ideology of 'Banderism'

among Ukrainians. This refers to the so-called 'Banderists' – members of the Organisation of Ukrainian Nationalists who orchestrated the genocide of Polish civilians in 1943–1945 in Volhynia, among other areas. As an older respondent stated: 'I am afraid of Ukrainians because I know how fierce they are. 365 *Ways of Murdering Poles in Volhynia*. Please read this book. I recommend it' (Rzeszów, 50–65).

Many respondents also feared that, if the Ukrainian community grows, at some point they will lose the motivation to integrate into Polish society and will start to create a kind of 'state within a state'. Once again, Western Europe appeared to be a negative point of reference here. The imagination of respondents was particularly stimulated by reports of immigrant enclaves, over which the Western states have allegedly lost control. Some even floated visions of the indigenous Polish population being replaced by immigrants, something that was supposedly already taking place in Western countries:

- *Yes, I am afraid because, as I said at the beginning, right now we're still under the pressure of these events, we're still imbued with this pain of theirs, with the desire to help. But when all this stabilises, they'll start to multiply here, to put it colloquially...*
- *And settle down.*
- *Start families, yes.*
- *There are already 16 dialects in London.*
- *They are similar, but they are not us. That's about it. I'm afraid of this replacement of the Poles.*
- *You see what's going on in London, over the years the Englishmen have been replaced...*
- *The Prime Minister is Indian, the owners of many facilities are Indian* (Rzeszów, 50–65).

In the above excerpt, we see a distinctive, seamless transition from the description of the growth of the Ukrainian community in Poland to the vision of the supposed 'replacement' of the English by the Indians in London. That's a very similar motif to the vision of 'Islamisation' threatening Europe, mentioned before. A counterpart to this notion, in fact, appeared in one of the interviews, namely the term '*Ukropolin*', with the vision of Poland subjugated to the Ukrainians behind it: 'If there is such an influx here as there has been so far, and if they settle here, then we can live in Ukraine. (...) In *Ukropolin*, as some people say (...) We can just be under their rule' (Łowicz, 50–65).

However, the vision of the future, from the negative narrative about Ukrainians, differed from the negative narratives about Middle Eastern and African migrants on at least one important point: the proponents of the former did not generally claim that Ukrainians in need should be turned away. They realised that, in the context of the ongoing war, it was, nevertheless, in Poland's interest to help Ukrainians. The answer, therefore, was not to close the borders – as in the case of the Belarusian border – but to implement a rigorous model of integration that would ensure that the Ukrainian community in Poland did not escape government control, as was to be the case with immigrant communities in Western Europe.

A strong emphasis was placed on the requirement to learn the Polish language and to adopt the customs of Polish society. Essentially, the aim was to prevent Ukrainians from imposing their customs: 'To be honest, I don't know much about Ukrainian culture but I just don't want anyone to impose their ideologies on anyone' (Warsaw, 20–30). Some respondents also mentioned the memory of the Volhynian massacres as a possible obstacle to the integration of Ukrainians into Polish society. There were, however, suggestions that certain symbolic gestures – such as the apology by the Ukrainian president – could remedy this.

What did the positive narrative's vision of the future look like? Respondents often cited the demographic benefits of many young Ukrainian women and children remaining in Poland. Economic

benefits related to increased competition in the market, Ukrainians setting up businesses or bringing in Ukrainian professionals were also pointed out. Above all, however, attention was drawn to the fact that Ukrainians can do the low-paid jobs that Poles no longer want to do:

From what I know from my friends in England, when Brexit happened, it turned out that the English are lazy, they don't want to do these simple jobs, on construction sites and so on. And we now have such a situation that Ukrainians can do it (Rzeszow, 20–30).

This pragmatic tone, appealing to the Polish interest, is already significantly different from the positive narrative about people from the Belarusian border, which was dominated by the language of moral obligation and completely lacked the language of benefits, the vision of the future and the references to positive economic or demographic changes that the influx of migrants could lead to.

Some also suggested that progressive Polish–Ukrainian rapprochement could contribute to the forgetting of old grudges – above all, the Volhynian massacre. There were also claims that this could lead to a permanent alliance between the two countries, which would prove extremely beneficial to Poland and improve its position in the international arena (in the words of one Rzeszów resident, it would make Poland a ‘superpower’). However, the importance of the integration of Ukrainians into Polish society was emphasised. The prevailing opinion was that Ukrainians who choose to live permanently in Poland should be treated in the same way as Poles – i.e. have both the same rights and the same obligations towards the state. Although adherents of the positive narrative also frequently mentioned the need to assimilate to the language and customs of Polish society, some emphasised that they would not mind the development of Ukrainian schools, clubs, orthodox churches and even entire neighbourhoods in Polish cities, citing the positive examples of Polish schools in England or China Town in New York becoming a tourist attraction.

To conclude this section, the importance of the visions of the future should be underlined: often, respondents did not speak only about what migrants had done but, rather, about what they would do. In the case of Ukrainians, the positive narrative included future scenarios involving work, schooling, integration and becoming ‘one of us’. In contrast, people crossing the Belarusian border were often associated with uncertain, threatening or deliberately ambiguous futures, including fears of crime, terrorism or social burden – the positive vision of the future was absent or vague. These forward-looking frames are powerful: they not only reflect current emotions but also help to anchor who is deemed worthy of help or rejection.

Conclusions

The previous sections examined the main narratives surrounding the situations at the Belarusian and Ukrainian borders, drawing on the collected data. It is now worth returning to the initial questions and considering why, in the case of the people from the Belarusian border, the negative narrative was so prevalent and, in the case of the newcomers from across the Ukrainian border – at least initially – the positive narrative dominated. Let us start with the former issue, using Dennison’s (2021) list of factors determining the popularity of the narrative cited in the theoretical section.

Firstly, congruence. The negative narrative about people from across the Belarusian border simply agreed with more publicly available information on the subject and subsequent media reports only added to its credibility. News of attacks on border guards or, finally, the murder of a Polish soldier at the border, found simple explanation within the negative narrative whereas, within the positive narrative,

they were somehow not supposed to happen, given its vision of migrants as defenceless 'victims'. The negative narrative was also more internally congruent, taking the presented cause-and-effect sequence into the future and presenting a vision – consistent with its other elements – of the dangers that might await Poles and the EU due to the influx of migrants. Meanwhile, in the positive narrative, the vision of the future was either absent or vague. That is no coincidence for, if the positive vision of the future based on the reception of migrants had been more clearly articulated in the narrative, it would have been difficult to reconcile with the narrative's vision of the source event, namely the criminal activity of the Belarusian regime. Even assuming that the migrants themselves were harmless, their admission would undoubtedly fuel Belarus' illegal trafficking of people into the EU and, indeed, open the door to further hostile actions of this country.

Secondly, group interests. While the negative narrative included an elaborate vision of the dangers of letting migrants in, the positive vision did not present the potential benefits of accepting migrants (economic or demographic ones), overshadowing them with the language of moral duty.

Thirdly, the negative narrative was solidly based on perceptions already widespread in Polish society, like negative opinions on Muslims and, to some extent, the old vision of Poland as the 'bulwark of Christendom', defending Europe against Islam. The positive narrative, on the other hand, not only lacked similar support but also threatened the positive self-perception of many Poles, who traditionally attributed hospitality to their nation (Omyła-Rudzka 2015).

The case of migrants from the Ukrainian border is more complicated. Here we are dealing with two internally and externally congruent narratives – initially only the positive one fulfilled the condition of external congruence with publicly known facts but, as the presence of Ukrainian refugees in Poland prolonged and tensions between them and Poles increased, solid grounds for a negative narrative emerged. Both narratives appeal to the interests of large social groups, foregrounding respectively the benefits and dangers that could affect millions of Poles due to the presence of Ukrainians in Poland. Finally, both find support in perceptions widespread in society even before the war, such as the belief that Russia poses the greatest existential threat to Poland or the image of Ukrainians as Stepan Bandera sympathisers hostile to Poles.

Thus, just by analysing the structure of the narratives about Ukrainian refugees, it is difficult to predict which one might become dominant over time. Probably this will be determined by the most changeable group of factors influencing the popularity of the narratives cited by Dennison, i.e. external congruence – new, publicised facts may tip the scales one way or the other. Does this mean, however, that, in the unfavourable circumstances of a protracted conflict and growing Polish-Ukrainian tensions, Poles' attitudes towards refugees from Ukraine may become as reluctant as those towards people from across the Belarusian border or those from the 2015–2016 migration crisis? In this case, the construction of the narratives provides some clues. Even if the negative narrative about Ukrainians was to become dominant in Polish society, it does not focus on isolating them – unlike the negative narrative about newcomers from across the Belarusian border. Instead, it emphasises the imposing of a restrictive model of integration into Polish society. Analysing the securitisation of migration from different directions, Polko (2025) notes that, although migrants from the MENA region and Ukraine were both securitised, the narratives about these groups differed markedly in intensity and justification, as reflected in Polish political and media discourse. The relative cultural proximity between Ukrainians and Poles, as well as commonly shared interests – or a common enemy – are still a solid barrier against the completely exclusionary narratives that became so popular so quickly in the face of the situation on the Belarusian border.

One of the key insights emerging from the study is that divergent narratives about the situations on the Belarusian and Ukrainian borders are rooted not only in their perceived origins but also in imagined trajectories – how the future (or potential) presence of migrants in Poland is envisioned. Respondents frequently expressed long-term expectations or fears: whether the newcomers would integrate, remain dependent or challenge the existing social order. These future-oriented narratives acted as justifications for either inclusion or exclusion and, in some cases, shaped perceptions of who deserved help in the present. This forward-looking dimension of public opinion appears to be a powerful explanatory factor in understanding the asymmetry between the Ukrainian and Belarusian cases.

Finally, it is worth emphasising that, while this article focuses on how ordinary people talk about migrants, these narratives do not emerge in a vacuum. As suggested several times, they are deeply influenced by political messaging, media framings and institutional discourse. For example, shifts in public attitudes towards migrants since 2015 have coincided with intensified securitising language in the state-controlled media and political speeches (Kowalczyk 2015). Even the more humanitarian discourse observed in 2022 was often aligned with state interests and national identity constructions. Acknowledging these upstream influences is crucial for understanding how certain perceptions become dominant, plausible or emotionally resonant in society. In particular, Polish public debate has been strongly shaped by polarised media ecosystems, with outlets such as TVP or TVN acting as echo chambers that amplified one-sided framings of the border events (Szyłko-Kwas 2023; Zessin-Jurek 2023a). Political elites across the spectrum have also strategically employed migration-related narratives to advance their agendas. It is precisely through these mediating structures that respondents' future-oriented narratives were formed, showing that individual voices are inseparable from broader discursive and institutional dynamics.

Notes

1. Used here for brevity, the term 'migrants' refers, in the article, to individuals arriving in Poland from across both the Belarusian and the Ukrainian borders, without implying their legal or moral equivalence.
2. This article draws on the concept of securitisation as developed by the Copenhagen School (Buzan, Wæver and de Wilde 1998), which views security not as an objective condition but as a discursive process. According to this perspective, security emerges when an issue is framed as an existential threat that justifies extraordinary measures and legitimises actions beyond the normal rules of politics. In this sense, security is not a given state of affairs but a socially constructed narrative, shaped by language, context and institutional authority. The term 'securitisation narrative' is used here to describe discursive patterns in which migration is presented not as a humanitarian or social challenge but as a threat to national identity, order or sovereignty. This approach does not exclude the existence of real threats but emphasises that what counts as a threat is always the outcome of interpretation and framing.

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A Stranger in My Village: Ukrainian Refugees in Poland's Rural Areas

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The attitude of inhabitants and representatives of local institutions towards refugees from Ukraine – and the possibility to include the latter in local social and economic life – plays a crucial role in a successful process of integration. A year after Russia launched a full-scale invasion of Ukraine, the authors carried out a quantitative survey among the inhabitants of one rural community in western Poland, investigating whether refugees were perceived as a potential factor of community development. This paper reveals the attitude of residents of that municipality towards war refugees from Ukraine. The predominant attitude is acceptance of the presence of Ukrainian refugees but there is also an element of opposition, albeit much weaker. Although there is demand for migrant labour in the municipality, and, without that labour, many farms and businesses would have to pare back their operations, at the same time the respondents do not fully see migrants as equal fellow residents, agreeing only reluctantly to the financial transfers involved.

Keywords: Ukrainian refugees, Polish rural inhabitants, attitudes towards the Ukrainians

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Introduction

For almost 10 years, the issue of migrants in Poland, including political and war refugees, has been complicated and politically problematic. Despite the growing number of refugees arriving in the country, especially in 2022 following the outbreak of the war in Ukraine, it was not until October 2024 that the government adopted the Migration Strategy for the years 2025–2030 (Chancellery of the Prime Minister 2024). This means, among other things, that no active measures have been undertaken thus far to include the new arrivals in the life of the country and local communities (Łodziński and Szonert 2023). This is also connected with the lack of a communication strategy presenting the potential benefits for Poland's development that taking in refugees might involve. People forget about the advantages which arrival could bring, especially when Poland is seeing a shortage of labour and admitting new residents would be in the interests of its current citizens. According to research (OECD 2017; Wysieńska and Karpiński 2011), in the longer term migrants contribute more to the budget in taxes than the costs of helping them, granting them health insurance, etc. There is also a positive impact on the economy due to the progressive specialisation and increased effectiveness of employees, both those from among the people coming into the country and native local residents.

Refugees could help to solve the problem of Poland's depopulation and ageing society, which obviously has economic, social and environmental implications. Poland is going through a process of internal migration that is geographically highly disproportionate: people are migrating from the peripheries to conurbation areas (Stanny, Komorowski, Rosner and Mróz 2023). In the years 2018–2020 the overall domestic migratory balance for rural areas in Poland was positive, in that 60 per cent of municipalities had a negative migratory balance while 40 per cent had a positive one. Many arrivals from Ukraine and other countries have a higher level of education (cf. Zymnin *et al.* 2022), so their relocation to peripheral areas could help to halt migration flows to conurbations.¹ Well-educated migrants could improve access to public services (e.g. healthcare) in peripheral locations. Many factors affect a migrant's decision to settle in a given place. Alongside economic factors, there is the subjective sense of security in a friendly environment where the native residents accept the new arrivals. As shown by research (Crawley and Hagen-Zanker 2019), it is not migration policies alone that influence the decision to go to and stay in a given place (country) but, rather, their interpretation and perception. This indicates the importance of the atmosphere surrounding immigrants that is created in a given community (Heath and Richards 2019; Phillimore 2021; Shaterian 2020). Hence it is important to explore how migrants feel in a given place and how local residents treat the new arrivals.

This article examines the social climate in a Polish urban-rural² municipality following the arrival of Ukrainian refugees, with a focus on patterns of reception, shifts in local residents' attitudes and the key factors shaping the refugees' prospects for integration. The analysis is grounded in the NIEM (National Integration Evaluation Mechanism) framework, which provides a structured approach to assessing integration outcomes. As we were investigating the phenomenon of mass migration to areas outside metropolises on a scale as yet unheard of in this part of Europe, we decided to use the case-study method, as this enables a given phenomenon to be explored 'in the context of reality, especially when the boundaries between the phenomenon and the context are not completely obvious' (Yin 2015: 66).

The attention of decision-makers and researchers of migration processes is the most often concentrated on big cities (e.g. Bukowski and Duszczuk 2022; Luczaj 2023), ignoring areas outside conurbations; our paper intends to fill that gap. At the same time, after almost 2 years of the full-scale war in Ukraine, Poland is in second place after Germany in the number of refugees from Ukraine

admitted into the country and taking advantage of temporary protection (data as of November 2023),³ which makes it a major player in Europe's migration processes.

In this text we present a set of general conditions that are very probably already history. The new conflicts that erupted at the beginning of 2024 in connection with foodstuffs, largely directed against Ukrainian produce, will probably have changed the perception of refugees and the general conditions, particularly among small-town and rural residents who are more closely tied to the situation in agriculture.

The context of Ukrainian migration

The movement of peoples – economic migrants as well as political and war refugees – is a pressing problem in today's world. This became evident in the second decade of the 21st century, when a wave of refugees from the Middle East and Africa reached not just developed Western Europe but Central-Eastern Europe as well. Having always been a 'country of emigration', Poland – due to the draft refugee relocation programme drawn up by the European Union – had to face up to the new problem and declare its acceptance or refusal of the proposed quota of refugees. This was during the election campaign of 2015. The issue dominated the campaign and became a hot topic for the conservative right, who did not hesitate to use racist arguments. This influenced the right's election victory and their 'nurturing' of the issue over the next 8 years, a time that offered many opportunities for this (Hargrave, Homel and Dražanová 2023).

It would be wrong to think that Poland did not have any economic migrants (from Ukraine or Belarus) or political migrants (e.g. from the Caucasus) before then; it did – but they had blended into Polish society. One indicator might be the topics of surveys regularly conducted by the CBOS Foundation. The great majority of Poles were favourably disposed towards migrants' working in Poland and felt especially friendly towards Ukrainians, Belarusians and Russians.⁴ This attitude was affected by personal contacts with working foreigners. Nevertheless, according to a study from 2016, Ukrainians themselves felt 'neither strangers nor the same' in Poland (Hargrave *et al.* 2023), which might mean that Polish people perceived Ukrainians in terms of a workforce rather than as fellow citizens.

A change in attitude occurred in 2015, when a wave of refugees from Muslim countries came into Europe and the European Commission discussed their relocation to countries that refugees had, until then, bypassed. Previously more favourably disposed towards taking in refugees, the Poles' attitude changed: whereas 21 per cent of those polled had been against admitting war refugees in May, this group grew to 53 per cent in December (CBOS 2014). The refugee situation was then exacerbated in summer 2021 when groups of refugees from the Middle East, Africa and Asian countries appeared on the Polish–Belarusian border, lured there by the Lukashenko regime. This hybrid war – which continues to this day – and the anti-refugee narrative built upon it serve to revive the negative stereotypes of these refugees.

Such stereotypes are not applied to Ukrainians, relations with whom – historically speaking – have had many dramatic turns. The histories of Poland and Ukraine were intertwined up to the mid-20th century. Until the end of the 18th century, a large part of today's Ukraine was part of the Polish–Lithuanian Commonwealth (*aka* the First Polish Republic). Between 1795 and 1918 the whole of Ukraine and a large part of Poland were under Russian administration (the Partitions). After World War I and the Polish–Bolshevik War of 1920, a large part of today's Ukraine lay within the borders of Poland, whose government pursued a policy of Polonisation of the Ukrainian population. During World War II, when these territories were occupied by the Germans, the 'massacres in Volhynia' took place: in July 1943 Ukrainians killed approximately 100,000 Poles – peasants and other rural residents. These events, never worked through by either society (censorship until 1989), are still vivid in Polish memories and are recalled not only in connection with anniversaries. Following the refugee influx, they have increasingly

been a subject of online hate speech. A sense of being threatened by Russia has been increasing among Poles since spring 2014, with the annexation of Crimea and the fighting with separatists in the Donbas (CBOS 2014). Migrants from areas affected by the war as well as other Ukrainians seeking safety – including economic security – outside their own country began to appear. The war had a powerful impact on migration processes in Ukraine after 2014 (Libanowa and Pozniak 2020). Most of these migrants remained in Europe and demographers estimate that, before the February 2022 attack, the Ukrainian diaspora was the most numerous there. In Poland, it numbered between 1 and 1.3 million people (Bukowski and Duszczuk 2022). A major wave of displacement – consisting primarily of women and children – crossed the Ukrainian border after 24 February 2022 and was subsequently resettled across various parts of Europe.⁵ Many headed for Poland and remained there: the statistics record the largest group (1.35 million) on the 200th day of the war – i.e. 10 September 2022. For a year after that, their number was stable at around 1 million. The refugees aimed mainly for the biggest cities and their environs.

This was the estimated number of Ukrainian forced migrants in Poland, pushed out of their country by full-scale Russian aggression. These people were directly affected by it – reactive motivations – or fearful of other repercussions, such as proactive motivations (Pachocka and Sobczak-Szelc 2018; Slany 1995).⁶

On that 200th day of the war, on average some 1,500 people each found shelter in suburban municipalities (counted as Urban Metropolitan Areas) and around 300 each in other municipalities. The latter were often chosen deliberately by the refugees as places they knew directly (from current or past jobs) or indirectly (through family or friends). Orlin,⁷ an urban-rural municipality in the Wielkopolska region, is one such peripheral municipality. A project entitled ‘The Absorptive Capacity of Rural and Small-Town Local Communities to Receive Refugees’⁸ was carried out there between September 2022 and October 2023. One of the problems analysed was the attitudes of this community’s members towards refugees – attitudes influenced by a great many factors.

The pace and degree of ‘saturation’ with refugees across various regions and communities varied: the presence of refugees in small towns and rural areas indicated that their burden on these spatial structures was less than on large cities and metropolitan areas. On the 200th day of the war, metropolitan areas housed 805,000 war refugees (58.5 per cent), with an average of 1,543 per municipality, while other areas housed 571,000 (41.5 per cent), with an average of 293 per municipality. By the 500th day, metropolitan municipalities housed 596,000 individuals (61.7 per cent), corresponding to an average of 1,142 refugees per municipality, while other municipalities housed 371,000 refugees (38.3 per cent), with an average of 190 per municipality. The influx process also exhibited different rationalities: the influx to metropolitan centres was *en masse* and spontaneous, whereas a significant portion of refugees chose provincial centres. The primary criteria for their choice were familiarity with the place (e.g., due to previous work there) or knowledge of people living there (family members currently working there, former employers, etc.). The evolution of the number of refugees over time (from the 100th to the 500th day of the war) was primarily influenced by economic factors (an absorbent labour market), which is evidenced by the shrinking proportion of refugees in local areas of Poland and migration from economically under-developed areas to those with better economic conditions. The attention of decision-makers and migration-process researchers is the most often concentrated on big cities, ignoring areas outside conurbations; again, our paper intends to fill that gap. Here, we focus on the absorption capacities existing in non-metropolitan, peripheral communities.

Undertaking our study on the absorption potential of rural communities towards Ukrainian refugees, we assumed that each such community had certain resources, actual or potential, physical and intangible – social and psychological. The latter are very important because they often determine the activation (or even new discovery) of physical resources (Parysek 2001).⁹ We assumed that the

attitudes of local residents – accepting refugees and the help given to them – were a major intangible resource, alongside knowledge, skills and social capital, the latter of which was conducive to their inclusion in local community life. On the other hand, disapproval of their presence and the help they received either limited or even prevented such a possibility.

Research methodology

The case study was conducted in the Orlin municipality. We had already conducted a study (on a different subject, see Halamska, Burdyka, Kaliowski, Kubicki, Michalska, Ptak, Sadłoń and Zwęglińska-Gałęcka 2021) in the municipality in question from 2019 to 2022, which made it much easier for us to ‘enter’ this local environment and access various kinds of information. The choice of Orlin was also influenced by the fact that a larger number of refugees reside in the western part of the country; in this regard, the location was more representative of the process we were analysing.

The urban-rural municipality lies in western Poland, i.e. far from the border with Ukraine. It is a depopulating municipality and this process will probably intensify.¹⁰ It has a population of just under 30,000 at present. The number of newly registered businesses is double that of deregistered businesses and suggests that the local economy is dynamic. The greatest percentage of the population is employed in agriculture, followed by industry and construction. The local labour market is receptive: the number of people commuting to work from outside the municipality was about 500 more than the number of those commuting away from it – and there is also a sizable demand for seasonal workers. Demand for labour is reported in transport (drivers), production, simple jobs (horticulture) and construction work. According to the staff of the County Labour Office, if it were not for Ukrainians going to work there before the war, the municipality would not have had anyone to do those jobs. Poles are not willing to do such work. Before the full-scale invasion of Russia in Ukraine, the number of Ukrainians in the Orlin municipality was estimated at around 600. The local authorities and entrepreneurs aimed, in 2019, to stabilise the group of Ukrainian workers by organising a forum for systematic contacts between Ukrainian workers and employers – which, however, was not successful. Nevertheless, due to the existence of such a large group of workers, the presence of foreigners was not new to this community and could become very useful in the initial humanitarian phase of the crisis.

The influx of war refugees began on 26 February. They arrived in different waves – initially a few people per day and, later, up to 30, which required significant mobilisation from the hosts. In total, approximately 800 people passed through the municipality and 750 PESEL UKR¹¹ documents were issued. After 100 days, 424 refugees resided there and, after 500 days, 447 refugees remained.

As we were investigating the phenomenon of mass migration to peripheral areas, we decided on the case-study method, as this enables a given phenomenon to be explored ‘in the context of reality, especially when the boundaries between the phenomenon and the context are not completely obvious’ (Yin 2015: 66). Case studies enable an in-depth understanding of complex social phenomena within their real-life settings, which is especially valuable when studying dynamic and context-sensitive processes such as local responses to forced migration.

We were guided by the principles of grounded theory, which is inductively derived from the study of the phenomenon it represents. This means that it is discovered, developed and provisionally verified through systematic data collection and through the analysis of data related to that phenomenon (Burawoy 1998).

A project was carried out there between March 2022 and October 2023. This was an in-depth case study based on many sources and a variety of methods: analysis of existing sources – e.g. local statistics and Statistics Poland, *Polska w Liczbach 2021* and the *Local Data Bank*); national statistics on the

changing number of Ukrainian refugees (PESEL UKR); local statistics compiled by the Orlin City and Municipality Office and institutions subordinate to the local government (such as the District Labour Office, Municipal Social Welfare Centre, schools and others). Four focus-group interviews (3 with individuals involved in the refugee reception process at the very beginning – teachers, local activists and entrepreneurs – and one with Ukrainian refugees), 20 individual interviews with people the most involved in the integration of refugees and key stakeholders of local development and an online survey on crisis management. The qualitative analysis was conducted in line with the principles of grounded theory, with inductive coding used to derive analytical categories emerging directly from the data. The resulting codes were then aggregated and organised around core thematic areas relevant to our research focus: cooperation, adaptation, integration and local attitudes toward refugees. This approach allowed us to capture the complexity of community dynamics and the multidimensional nature of refugee inclusion processes.

The opinion surveys, which form the basis of the analysis of attitudes, were conducted twice. In April 2022, as part of the study ‘Opinions on Quality of Life and Development Directions in the Municipality in 2022’, 3 questions (see Table 1) regarding attitudes towards refugees were asked. The surveys were carried out on a representative sample of residents (N=840). They were conducted again in March 2023 on a stratified random sample of 206 people. The strata were constituencies, an equal number of constituencies being chosen from the rural part and from towns, the proportion between the urban and rural populations being preserved. The same questions from 2022 were repeated (to illustrate the dynamics of change in some attitudes) but the questionnaire was exclusively dedicated to various aspects of attitudes towards refugees. For this study, the 5-element Likert scale was used. The results are presented in the form of 3 acceptance/opposition indices: individual, local and generalised. For a more complete picture, a questionnaire (in Ukrainian) was carried out among the refugees from Ukraine in November 2022 – i.e. 9 months after the war broke out and the first refugees had arrived in the municipality. The survey was carried out using the auditory method. The respondents were chosen through snowball sampling by the municipality’s officials, which ensured differentiation of the migrant community by place of residence: collective and individual accommodation. This survey involved 79 respondents with just 13 per cent of them male.¹² Information about the refugees’ problems was supplemented through individual interviews. It is important that both surveys were carried out after the 2 communities had been living side by side for several months and had been able to experience what it meant to ‘be taken in as refugees’ and to ‘take in refugees’ (literally or otherwise).

This dynamic – of the influx and outflow of refugees – also indicates the absorption capacities of different communities, both metropolitan and peripheral. It is influenced by various factors. In our research, we focused primarily on the possibility of the sustainable integration of refugees in rural and small-town local communities and the favourable conditions for them. In assessing the possibility of absorption (Halamska 2023a), we referred to research on NIEM¹³ (Dolinska, Górská, Homel and Kucharczyk 2022), specifically those from the ‘General Conditions’ dimension, which includes community attitudes, access to information and the participation of refugees in local decision-making processes. While NIEM was originally designed for the macro-level, comparative analysis of integration policies, we adapted its categories to assess micro-level processes in a rural municipality, focusing on how informal institutions, civic networks and public perceptions shape local integration outcomes. These dimensions directly informed the structure of our questionnaire and guided the coding of qualitative interviews with both institutional actors and residents. In analysing local integration capacity, we applied Parysek’s (2001) distinction between tangible (e.g., housing, employment opportunities, public infrastructure) and intangible resources (e.g., trust, social capital, local identity).

This distinction was particularly useful in interpreting the role of informal cooperation networks (e.g., volunteer-driven crisis teams) and attitudes toward refugees as non-material assets that either facilitated or hindered inclusion. Finally, to complement the analysis of policy-related drivers, we incorporated the concept of chain migration, understood here as the tendency of migrants to settle in locations where they already have personal or work-related connections (Libanova and Pozniak 2020). This mechanism proved to be particularly relevant in the Orlin municipality, where previous seasonal or permanent labour migration from Ukraine had established informal pathways that strongly influenced refugees' choice of destination.

The analysis of the former element – how the refugees were received – was based on the structure and activities of the Crisis Team (ZK); the relevant information was gathered with the help of focus interviews with ZK members and individual ones with the ZK coordinator, ZK members responsible for different forms of assistance (education, health, welfare, social media and others) and the mayor, who headed the ZK *ex officio*. The attitudes of this community's members towards refugees were shaped by numerous factors. Undertaking our study on the absorption potential of rural and small-town local communities towards Ukrainian refugees, we assumed that each such community had certain resources, actual or potential, physical and intangible – social and psychological. The latter are very important because they often decide on the activation (or even new discovery) of physical resources (Parysek 2001). We assumed that the attitudes of local residents – accepting refugees and the help they are given – were a major intangible resource, alongside the knowledge, skills and social capital that were conducive to their inclusion in local community life. On the other hand, disapproval of their presence and the help they received limited or even prevented such a possibility.

Research outcomes

The reception and initial adaptation of refugees

The first 100–120 days (from 24 February to the middle/end of June) represented the period of reception and initial adaptation of refugees. During this time the main problem was the organisation and self-organisation of the local community in the crisis created by the unexpected influx of war refugees from Ukraine. Key problems included the character and rhythm of the refugee influx, the organisation of assistance, the composition and functioning of the crisis team, the scale of mobilisation of the local community in the assistance operation and the type of humanitarian aid provided.

A 'refugee' Crisis Team of 58 people was promptly appointed in Orlin; the team defined how tasks and competences would be divided, set up a system of internal communication and decided how information would be exchanged within the team and diffused in the local community. The influx of refugees thus did not take residents by surprise. On the contrary, the diffusion of information resulted in the community's mobilisation, as evidenced in the interest shown in various forms of assistance. In this mobilisation, a very important role was played by the Internet and electronic means of communication (e.g. Facebook, WhatsApp). The Crisis Team comprised various specialist staff as well as invited volunteers, almost all of whom had connections with the local power system. These were relatively young people – 30- and 40-year-olds. Everyone in this 'local government' group already knew one another; a few people said that they had come to know one another even better during the course of their work.¹⁴ To use a colloquialism, they were thus 'in their own bubble', which was made up of many other 'bubbles' that each of the team members had and, when needed, took advantage of such an

individual database of contacts. The Crisis Team's 'bubble structure' had a fundamental impact on its effectiveness. Moving in their respective 'bubbles', the team members were able to quickly solve many tough ('insoluble') problems because they could count on loyalty and mutual trust¹⁵ – i.e. intangible resources or social capital. The existence of a formal crisis team is mandatory in every municipality in Poland. Thanks to the experience of the COVID-19 crisis, in Orlin this team was transformed into a real structure that operated efficiently, taking advantage of the few existing legislative solutions. The main difficulty lay in the operationalisation of such legislation – i.e. its application in actual, often complicated cases. A sense of getting no help from the national government was combined with fears as to how these solutions' implementation might be assessed in the future, which was understandable in view of the then-central government's aversion to local governments' independence. It was similar later on, when various technical guidelines on the special law on helping Ukrainian refugees did not fit specific situations. In such cases, the only option was to 'pull no punches', following the widespread belief that you could get around every regulation – or you should at least try. The interviewees themselves admitted that, in 'law-abiding societies', i.e. those that follow the letter of the law, such an aid campaign would not have been possible. The efficiency and effectiveness of admitting refugees in Orlin was based on the unique 'bubble structure' in which the glue was direct acquaintance, mutual trust and belief in mutual loyalty. This kind of functioning is only possible in relatively small local communities.

The reception and initial adaptation stage was a period of strong feelings of temporariness. This was noticeable on both sides, among both the refugees and their hosts. The refugees intended to 'go back soon', while the hosts assumed that the guests 'would leave soon'. Coming out of this transience was a time of initial dual adaptation: by the refugees who had to revise their plans in view of the course the war was taking and the hosts who realised that the date of their guests' return to their own country was undefined. At that time no one realised that the assistance might be long-term.

According to one questionnaire survey (with Orlin's citizens, N=206), in the period from February 2022 to February 2023, 70 per cent of those polled declared that they had provided some form of assistance to refugees. Those who had not helped in any way were mainly people with no more than secondary education,¹⁶ male and slightly more often rural rather than urban residents. The assistance mainly involved taking part in collections of goods and money for the refugees. Less often, this was aid that required more time and commitment, such as organising a collection (16 per cent) or helping with transport (14 per cent). As for overnight accommodation, more was provided in the initial period, including to 'transit' refugees. Diverse aid was also needed after the period of humanitarian reception; it was provided by private individuals and the various types of institution which – according to the respondents – were supposed to handle this. However, people most often pointed out that the greatest effort to organise a life for themselves in Poland rested with the arriving refugees. This might be explained in 2 ways: either as a limited readiness to offer systemic aid to others or as an expression of the internalised declarative value of self-reliance. The second most frequently mentioned entity providing aid was the municipality government, mentioned even when such aid was not among its responsibilities. This may be interpreted as people's attachment to the principle of subsidiarity or a lack of trust in national-level institutions. Grouped under the umbrella term 'the government', these were perceived as entities ensuring systemic solutions related to specialist healthcare, support for people with disabilities and chronic illnesses and additional cash benefits for the refugees. Though another national institution (the Catholic Church) has local agencies (parishes), respondents absolved it of any obligations towards the refugees (apart from helping the sick and people with disabilities – 13 per cent).

Did this aid meet the expectations of the refugees? As a survey conducted among the refugees showed, in the first days after arrival they received help from Poles, private individuals (38 per cent)

and Municipality Office employees (32 per cent) or another person from Ukraine (9 per cent). This does not change the fact that respondents who said they had someone to turn to for help (63 per cent of those polled) mentioned in the first place that it was someone from Ukraine (38 per cent) and only in second place someone from Poland whom they had only just met. The Ukrainian respondents said they had no contact with the pre-war Ukrainian diaspora in Orlin. One may therefore assume that the people who might have helped them were the most probably those who had found themselves in the same difficult circumstances. From their arrival, they felt taken care of by residents, officials and local-government institutions.¹⁷

The municipality's residents are pleased with themselves and think (78 per cent of respondents) that they coped well in a situation involving the influx of such a large number of new inhabitants. Considering that 70 per cent of respondents declared have given some form of aid to refugees in 2022,¹⁸ one may assume that the respondents were speaking about themselves, appreciating their own efforts in this area. They also expressed appreciation for the efforts of the local government in providing aid to the refugees: 62 per cent of respondents said it was sufficient, while nearly 14 per cent thought it was excessive.

Dynamics of attitudes

Polish people's attitudes towards Ukrainian refugees has evolved over time. Polish society now broadly agrees that refugees from areas affected by the war should be taken in but this consensus has been slowly deteriorating: in an April 2022 study by the CBOS public-opinion research centre, 90 per cent of respondents agreed, while the figure in February 2023 was 80 per cent. It may also be important to recognise that the proportion between 'definitely yes' and 'probably yes' has changed: the former response decreased, while the latter increased; the percentage of negative answers also grew. Further decreases were reported in the CBOS survey from April 2023: support dropped to 73 per cent while opposition grew to 20 per cent. In the structure of responses related to the extent of Polish assistance, the changes are small and involve an increase from 18 to 26 per cent in those who believe that Polish assistance is excessive (CBOS 2022, 2023).¹⁹ The results of the opinion poll in the municipality of Orlin are less optimistic, as documented in Table 1.

Table 1. Dynamics of opinions on help for Ukrainians (in %)

Do you think Poland should take in Ukrainian refugees from areas affected by the conflict?						
	Definitely yes	Probably yes	Hard to say	Probably no	Definitely no	Time of survey
Orlin I	5.3	42.8	31.9	10.3	9.7	April 2022
Orlin II	11.7	43.7	27.7	11.7	5.3	March 2023
Do you think the assistance our country is offering refugees from Ukraine is:						
	Sufficient	Too big	Too small	Hard to say		Time of survey
Orlin I	43.6	26.2	1.5	28.7		April 2022
Orlin II	54.9	21.8	4.4	18.9		March 2023
If some of the refugees want to stay in Orlin, after the Ukraine war is over, do you think:						
	It is very good that they will stay	They should leave	I do not care either way	Hard to say		Time of survey
Orlin I	13.4	36.3	21.1	29.2		April 2022
Orlin II	19.6	32.5	35.0	13.1		March 2023

Source: own work based on: I *Opinie mieszkańców MiG Orlin o jakości życia i kierunkach rozwoju gminy w 2022 r.* N=840 and II *Opinie mieszkańców gminy Orlin w rok po wybuchu wojny na Ukrainie*, IRWiR PAN N=206.

This is the background to our analysis of the attitudes of the community in question, composed of the residents of towns and the surrounding villages. Compared to nationwide data, acceptance for assistance provided to Ukrainian war refugees is much smaller (48–55 per cent) and opposition is expressed by a fifth of the population under consideration. The lack of an opinion among a third of the population is intriguing; this group may also include people who did not have the courage to negate the appropriateness of accepting refugees from war-torn areas. On the other hand, compared with nationwide tendencies, the evolution of opinions has taken a different direction: the acceptance of assistance is growing at the cost of the undecided ('hard to say'). Residents of the municipality of Orlin also seem to be much more cautious in their positive judgment of Polish assistance, again hiding behind the safe 'hard to say' response. The same is also true for the question of refugees settling in their municipality: indifference to this or the lack of a stance accounts for about half the population. Among the respondents expressing a clear opinion, the dominant view is that 'They should leave', while the minority view that 'It's very good that they will stay' represented a slightly larger group in March 2023 than in April 2022.

Acceptance vs opposition

As the questionnaire surveys from 2022 and 2023 show, the residents of the municipality of Orlin were very reserved in their attitude towards assistance for war refugees from Ukraine. The presence of Ukrainians was nothing new to them, since they had already been present on the local labour market for several years, both as permanent and as seasonal workers – mainly in agriculture and horticulture. The distribution of opinions (see Table 1) shows that, between 2022 and 2023, the acceptance of refugees increased rather than decreased (which differs from the nationwide trend).

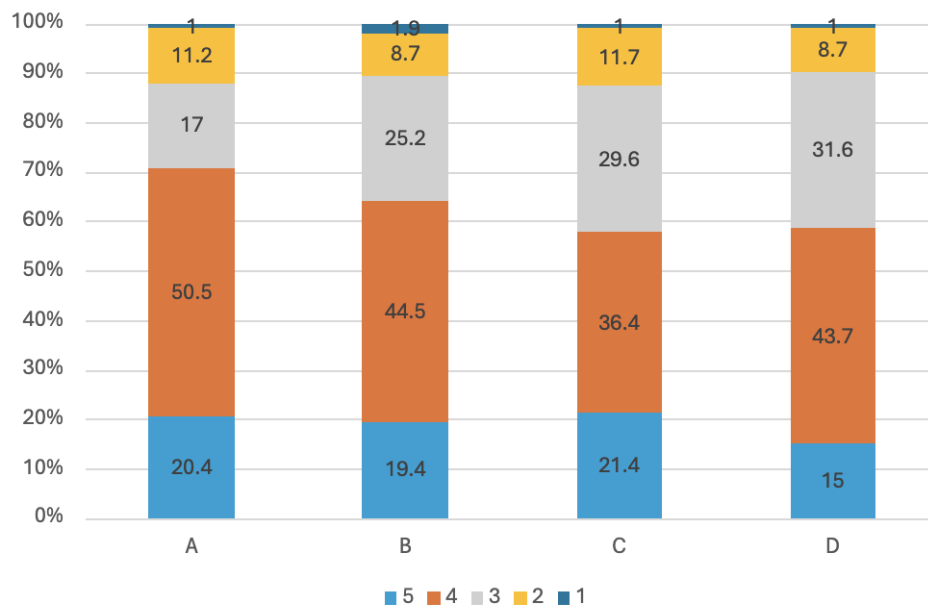
Of course, the presence of refugees influences certain aspects of this community's functioning and the respondents notice this. How this influence is perceived and judged affects people's attitudes, tipping the balance towards acceptance or opposition regarding the presence of Ukrainians in the municipality residents' personal lives, their local life and life in Poland in general.

Approval – on a verbal level – concerning personal or even intimate relations with Ukrainians, is presented in the personal index, developed on the basis of the distribution of replies to 4 questions (Table 2).

The average of the 4 responses (the index value, Figure 1) is 3.69 (where the minimum is 1.50 and the maximum 5.00) and the responses indicate that acceptance predominates over opposition.

Table 2. Individual index

Would you have anything against: (no = 5 points, probably no = 4, hard to say = 3, probably yes = 2, definitely yes = 1)	Average
A – getting medical treatment from a person from Ukraine	3.78
B – your boss at work being a person from Ukraine	3.71
C – a person from Ukraine becoming your life partner	3.66
D – your child being in a relationship with a person from Ukraine	3.63

Figure 1. Individual acceptance index

Source: the survey *Opinie mieszkańców gminy Pleszew w rok po wybuchu wojny na Ukrainie*.

Note: created based on the distribution of responses to the question: Would you have anything against:

A – getting medical treatment from a person from Ukraine

B – your boss at work being a person from Ukraine

C – a person from Ukraine becoming your life partner

D – your child being in a relationship with a person from Ukraine?

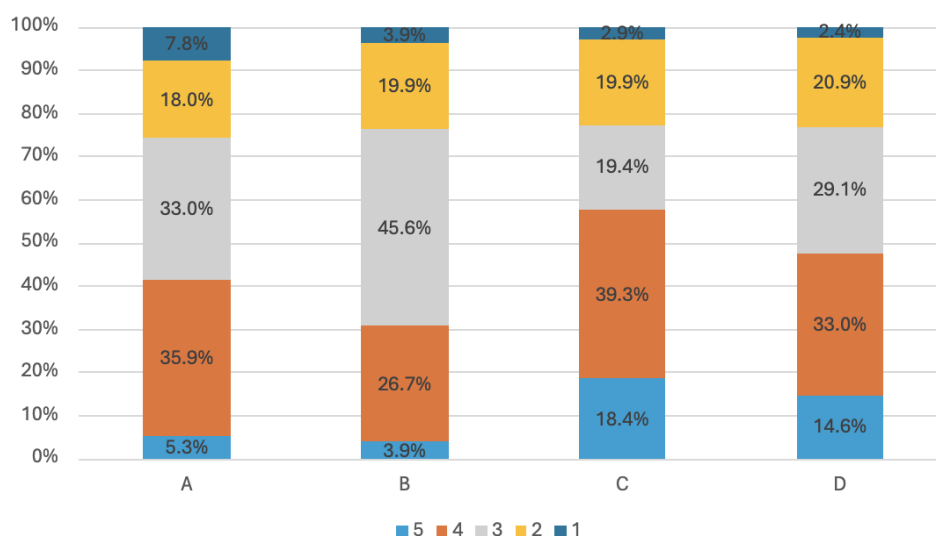
(no = 5 points, probably no = 4, hard to say = 3, probably yes = 2, definitely yes = 1).

The local index was constructed in the same way: here, the 4 questions were about the presence of Ukrainians and their participation in local life (Table 3).

The local average (the index value) is 3.27 and, as the graph in Figure 2 shows, is quite diverse: there is a greater acceptance of issues with an individual aspect (having a Ukrainian neighbour, letting Ukrainians have a say in local affairs), while scepticism (or just reserve) appears when estimating future benefits for the community (Figure 2).

Table 3. Local index

Do you agree that: (yes = 5 points, probably yes = 4, hard to say = 3, probably no = 2, definitely no = 1)	Average
A – war refugees from Ukraine should continue coming to the municipality	3.13
B – the municipality's development can benefit from Ukrainians settling here	3.07
C – a person from Ukraine could live in your immediate neighbourhood	3.38
D – a person born in Ukraine could be a municipal councillor	3.50

Figure 2. Local acceptance index

Source: the survey *Opinie mieszkańców gminy Pleszew w rok po wybuchu wojny na Ukrainie*.

Note: based on the distribution of responses to the question: Do you agree that:

A – war refugees from Ukraine should continue coming to the municipality

B – the municipality's development can benefit from Ukrainians settling here

C – a person from Ukraine could live in your immediate neighbourhood

D – a person born in Ukraine could be a municipal councillor?

(yes = 5 points, probably yes = 4, hard to say = 3, probably no = 2, definitely no = 1)

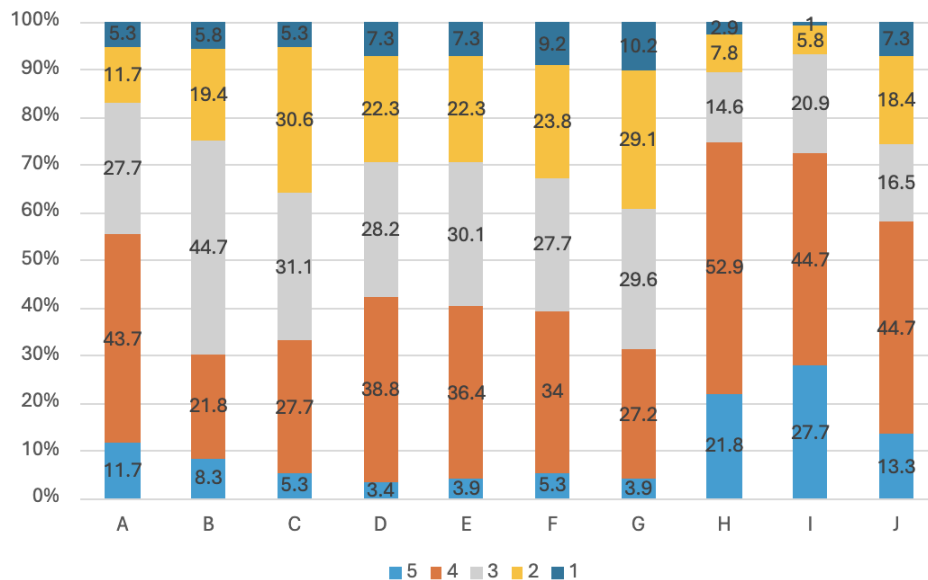
The generalised (general) index, which looked at these issues at the national level, was constructed in a similar way to the 2 previous indicators: the respondents judged the predicted impact of the presence (temporary or permanent) of Ukrainians on affairs in Poland (Table 4). As many as 10 elements were considered here; the first 2 concerned the acceptance of continuing to take in war refugees and the possible economic benefits involved, 7 involved the approval of various financial benefits to which the law entitles the refugees and the final one was the approval of their possible application for Polish citizenship.

The general acceptance index's average value was 3.27, with somewhat diverse values in the individual items (Figure 3). The greatest acceptance was shown for access to public healthcare and free public education; the lowest for the set of statutory public benefits ranging from the unemployment benefit to the 500+ child benefit. Here the municipality's residents did poorly in the test of interpersonal solidarity, which may indicate a 'nationalist appropriation' of welfare benefits.

Table 4. General index

Do you agree with the following statement: (yes = 5 points, probably yes = 4, hard to say = 3, probably no = 2, definitely no = 1)	Average
A – Poland should continue to take in war refugees	3.45
B – this will bring Poland economic benefits in future	3.07
C – people from Ukraine have a right to receive the 500+ child benefit	2.97
D – people from Ukraine have a right to receive family benefits for children	3.09
E – people from Ukraine have a right to receive care benefits	3.07
F – people from Ukraine have a right to receive the benefit for the birth of a child	3.02
G – people from Ukraine have a right to unemployment benefit	2.85
H – people from Ukraine have a right to free healthcare	3.83
I – people from Ukraine have a right to free public education	3.92
J – people from Ukraine may effectively apply for Polish citizenship	3.38

Figure 3. General acceptance index



Source: the survey *Opinie mieszkańców gminy Pleszew w rok po wybuchu wojny na Ukrainie*.

Note: based on the distribution of the answers, do you agree with the following statement:

A – Poland should continue to take in war refugees

B – this will bring Poland economic benefits in future

C – people from Ukraine have a right to receive the 500+ child benefit

D – people from Ukraine have a right to receive the family benefit for children

E – people from Ukraine have a right to receive the care benefit

F – people from Ukraine have a right to receive the benefit for the birth of a child

G – people from Ukraine have a right to the unemployment benefit

H – people from Ukraine have a right to free healthcare

I – people from Ukraine have a right to free public education

J – people from Ukraine may effectively apply for Polish citizenship?

(yes = 5 points, probably yes = 4, hard to say = 3, probably no = 2, definitely no = 1)

All the indicators (individual, local and general) suggest acceptance rather than opposition. The respondents expressed the fewest objections on matters that might affect them personally and the most on benefits payments. Granting refugees the right to unemployment benefit and child benefits caused the most negative emotions. Does this mean that they are considered solely as ‘Polish benefits for Polish people’?

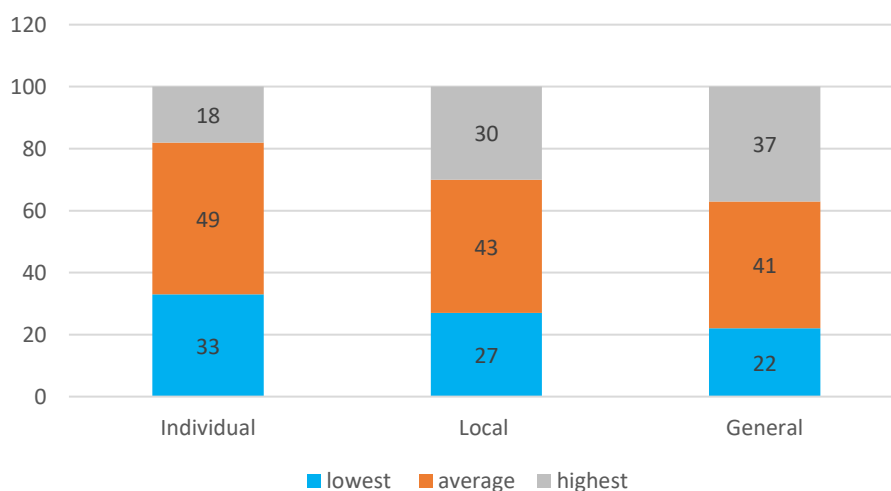
Each index value is the average of the personal index values of the 206 respondents which, in each case, might range from 1.50 to 5.00. Among the respondents, we were particularly interested in those with low values of the acceptance index (opposition) and those at the other end of the scale, i.e. those with the highest values (acceptance). For each index, we divided the respondents (206 people) into 3 groups using the natural-breaks method.²⁰ The share of the groups thus distinguished, i.e. lowest, average and highest support, is different for each index. For the individual index, only fewer than a fifth (18 per cent) of the respondents showed the highest (and very high – 4.25, 5.00) acceptance index and as much as a third the lowest.

Table 5. The acceptance index

	Natural breaks classes by level of acceptance		
	Lowest	Average	Highest
Individual index			
Jenks classes – intervals	1.5, 3.25	3.25, 4.25	4.25, 5.00
Participation N=206	33%	49%	18%
Local index			
Jenks classes – intervals	1.50, 2.75	2.75, 3.50	3.50, 5.00
Participation N=206	27%	43%	30%
General index			
Jenks classes – intervals	1.50, 2.70	2.70, 3.50	3.50, 5.00
Participation N=206	22%	41%	37%

Source: the survey *Opinie mieszkańców gminy Pleszew w rok po wybuchu wojny na Ukrainie. Index.*

Figure 4. Structure of the three types of acceptance indices



Source: The survey *Opinie mieszkańców gminy Pleszew w rok po wybuchu wojny na Ukrainie.*

In the case of the local index, almost a third of the respondents fell within the highest acceptance interval (with a much lower threshold – 3.50), while a quarter were in the lowest interval. The general index turned out to be the most liberal (threshold of 3.50): almost two-fifths of the respondents fell within the highest acceptance interval, while a fifth were in the lowest interval. This means that (high) acceptance of very personal relations was the most difficult for the respondents, while local and general social relations were much easier. These attitudes appear to be cohesive: there is a correlation between the 3 indices. The correlation between the local and general indices is quite strong (Cramér's V 0.46, contingency coefficient 0.86), while that between the individual and general indices is similarly strong (0.45, 0.86). The correlation between the general and local indices is slightly weaker (Cramér's V 0.29, contingency coefficient 0.73). Is it therefore possible to identify the characteristics of the 'accepting' and 'opposing' groups with considerable probability? The set of characteristics of the extreme groups – accepting and opposing – according to the individual and general indices does not provide unequivocal answers (Table 5). In the case of the individual index, there are clear regularities. Acceptance of personal contacts with Ukrainians is higher among females, middle-aged people and those with a higher level of education. This combination of features suggests that the middle class²¹ which, by definition, has higher social and cultural capital, is more liberal and cosmopolitan. However, as other research shows, it could also be more a question of political correctness (Wyciechowski *et al.* 2016). On the other hand, respondents with the lowest individual index values (opposing refugees in individual relations) mainly come from the urban population, are male, from the older age groups and have a poorer (secondary) or the poorest (vocational and elementary) level of education. There are no such clear correlations in the distribution of the characteristics of the general index's extreme groups and this was already noticeable in the structure of the items it covered and the surprising diversity of their perception. In the accepting group, there is only a clear predominance of women. Some regularities may be noticed in the opposing group, partly the same as in the 'individual opposing' group. These are more often rural rather than urban female residents, from the middle-age group and quite well educated. Is this the new rural middle class?

Summary

A large wave of refugees arrived in the urban-rural municipality under consideration in the first months after Russia's full-scale invasion of Ukraine. For the residents of this community, just as for most Polish people, this was not their first contact with Ukrainians: they had been coming to the municipality and its environs for many years as permanent and seasonal workers. Their reception was efficient and well organised, something of which the community was proud a year later. However, compared to nationwide surveys, the opinions expressed by residents were very cautious and reserved from the start – and remained so a year after the war broke out. Acceptance of Ukrainians in the municipality is more frequent among women with a higher level of education, which is also little different from the nationwide results (cf. CBOS 2023).²² The arrival and year-long stay of refugees was observed by the municipality's residents; opinions about the refugees appeared and attitudes towards them developed. In the year since the refugees arrived in the municipality of Orlin, the residents' overall lives changed: living conditions deteriorated due to high inflation and fears connected with the escalation of the conflict intensified. Hate speech towards Ukrainians and the rehashing of historical conflicts appeared in the media, especially the digital media. The fact that Poles' attitudes toward migrants are not constant over time is also highlighted in other research (Kubiciel-Lodzinska and Solga 2023).

Generally speaking, the predominant attitude is acceptance of the presence of Ukrainian refugees but there is also an element of opposition, albeit much weaker. The average number of accepting responses

(‘Definitely yes’, ‘Probably yes’) is twice as high as opposing responses (‘Definitely no’, ‘Probably no’) in the local and general index; it is 6 times as high in the individual index. However, it is worth noting the sizable share of responses avoiding any clear position, expressed in responses like ‘I don’t know’, ‘I have no opinion’ or ‘I don’t care’. One may suspect that this stems from the fear of adopting a definite stance – accepting or opposing. The respondents were the most unequivocal when speaking about private, intimate relations. The ‘accepting group’ itself is relatively small here but the acceptance indicators are high; the ‘opposing group’ is twice as large but not radical (see Figures 1 and 4). Acceptance of the Ukrainians’ presence is much more widespread – but not stronger – in the public sphere, i.e. local and national. However, again, the group of those unwilling to reveal their attitude is quite substantial, whether they are pretending or really do not have an opinion on a given issue (cf. Figures 2, 3 and 4). Our research reveals a process of polarisation of opinion which is also observed in other surveys from this period (Halamska 2023a). The increase in acceptance of refugees in Orlin after one year – contrary to national trends – may be attributed to the community’s gradual adaptation to the presence of Ukrainian refugees in their immediate surroundings. This may also stem from the research methods employed, which further underscores the value of conducting follow-up studies in the future.

Although there is a demand for migrant labour in the community and although, without this labour, many farms and businesses would have to pare back their operations, at the same time the respondents do not fully see migrants as equal fellow residents, only reluctantly agreeing to the financial transfers that are available to anyone with a PESEL number.

It seems that in the case of this community, too, one would have to agree with the Swiss author Max Frisch’s words: ‘We asked for workers; we got people instead’,²³ which is how he commented on Germany’s migration policy. Since Poland, like all the EU countries, is a country with an ageing society, it needs new inhabitants, who often come here prepared to work but at the same time want to be treated the same as everyone else living there. There is some fear that the longer the war lasts, the further people’s patience and openness towards refugees will decrease. The lack of migration policies, including poor communication of the importance of immigrants for the Polish as well as the local economy, is not helping to build good general conditions for Ukrainians, not to mention people coming from other socio-cultural contexts.

With the lengthening of the war, uncertainty and growing inflation, as well as the government switching to a narrative that is more unfriendly towards Ukrainians, it is important to continue this research, exploring the attitudes of the municipality’s residents as well as those of the migrants in order to find out whether living next to each other helps in accepting each other more easily or leads to greater dislike.

The case study employed in this research offers numerous advantages, including the ability to examine a complex phenomenon – namely, the process of migrants’ adaptation to a local community – within its contextual setting. The authors are, however, aware of the limited generalisability of the findings. To mitigate this limitation, national-level data (e.g., from CBOS) were also consulted. Nonetheless, such data did not capture the evolution of attitudes with the same degree of detail as the present study. It would undoubtedly be valuable to replicate this research in the near future within the same community, in order to trace the ongoing evolution of residents’ attitudes towards migrants, as well as the behavioural responses of the migrants themselves.

Notes

1. The problem has been noticed by the national authorities, who have developed the *Wzajemnie Potrzebni* [Mutually Needed] public task (<https://wzajemniepotrzebni.pl/o-projekcie/>), its aim being to improve the housing infrastructure in rural and small-town areas so that accommodation can be offered to people from Ukraine.
2. An urban-rural municipality is one of 3 administrative types of municipality in Poland.
3. <https://www.consilium.europa.eu/en/infographics/ukraine-refugees-eu/>.
4. The acceptance of foreigners' work has grown noticeably in the course of 20 years. In 1992, (emerging unemployment) the employment of foreigners was approved by two-fifths of Poles while, in 2010 (labour shortages), the figure was four-fifths (CBOS 2010).
5. According to UNHCR data (<https://data.unhcr.org/en/situations/ukraine/>), as of 12 September 2023 the estimated number of refugees having fled Ukraine since 24 February and applied for asylum, temporary protection or other similar national protection programmes in European countries, was the greatest in Russia (1.3 million), followed by Poland (1 million), Germany (1 million) and Czechia (370,000). Between 150,000 and 200,000 refugees from Ukraine were also reported in countries with a large Ukrainian diaspora: Italy, Spain and the United Kingdom. Eastern European countries such as Romania, Slovakia and Moldova, which were included in the UNHCR regional refugee response plan for Ukraine, took in about 100,000 refugees. Canada, the United States and Israel, which have the largest Ukrainian migrant communities outside Europe, also took in some 100,000 refugees.
6. Many of them could be categorised as proactive forced migrants who, however, did not seek international protection but themselves undertook ways to remain in Poland. 'Forced migrants is a very capacious category, encompassing different groups of people; the reasons for migration often co-occur in various combinations, which makes it impossible at times to pinpoint their precise nature' (Pachocka and Sobczak-Szelc 2018: 336).
7. The name of the municipality has been changed for anonymisation purposes.
8. The project was carried out under the NAWA Intervention Grants programme, based on agreement no. BPN/GIN/2022/1/00021/U/00001.
9. One might invoke Jerzy Parysek here, who claims that there is no universal classification of development factors and therefore also local resources. He underlines (2001: 120) that, regardless of the classification one adopts, it remains certain that an actual, effective and significant development or success of an undertaking is determined by a set of factors that are in dynamic interaction with one another.
10. Urban-rural municipalities with a negative migration balance amount to almost 60 per cent in Poland.
11. PESEL UKR – Identification number (PESEL) with special status for Ukrainian citizens who arrived in Poland after 24 February 2022, due to the armed conflict.
12. The Appendix contains Table A1, which presents the basic social characteristics of respondents in both studies.
13. NIEM (National Integration Evaluation Mechanism) – criteria for evaluating the progress of migrant/refugee integration – a project co-funded by the EU, was conducted between 2016 and 2022 in 14 European countries. About 150 indicators were created, divided into 4 groups: general conditions, legal integration, socio-economic integration and socio-cultural integration (Wolfhardt, Conte and Yilmaz 2022). From the point of view of this research, the key indicators

- are general conditions, which include the course of reception, the creation of a migrant-friendly environment and the inclusion of migrants in the co-management of the integration process.
14. The online survey *Crisis Situation Management* conducted among members of Orlin's Crisis Team in May 2023.
 15. A similar way of functioning in the COVID-19 crisis invoked the 'clique' system; here, it should be noted that, in this approach, 'clique' is not a pejorative term but means an exclusive 'pure community' (cf. Halamska, Kurczewski and Ptak 2020).
 16. In the context of the Polish education system, secondary education refers to upper-secondary schooling, typically completed between the ages of 18 and 20.
 17. One woman said in her interview that, if such a catastrophe had happened to the Polish people, they – the Ukrainians – would not have been able to help in this way.
 18. Providing various forms of assistance was more likely among people with a higher level of education who were aged between 35 and 64 and living in towns.
 19. Cf. *Polacy wobec uchodźców z Ukrainy* [Poles' Attitudes Towards Refugees from Ukraine], CBOS (2022) and *Polacy o wojnie w Ukrainie w rok po jej wybuchu* [Poles on the War in Ukraine One Year After It Broke Out], CBOS (2023).
 20. Natural Breaks (Jenks) – a method of dividing a variable into classes in such a way as to minimise the variance within them and maximise the variance between them.
 21. The middle class is defined here as a social stratum engaged in non-manual forms of labour that require formal qualifications and domain-specific competencies, which constitute the basis for occupational identity and status differentiation (Halamska 2023b).
 22. This is the effect of the set of multiple-choice questions in the CBOS survey and in our survey in the municipality of Orlin. Conforming to the principles of the Likert scale, we place the 'hard to say' response in the middle of the set, while CBOS placed it at the end, in a way forcing respondents to make a directional choice – acceptance or opposition.
 23. <https://quotefancy.com/quote/1196607/Max-Frisch-We-asked-for-workers-We-got-people-instead>.

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Appendix

Table A1. Basic social characteristics of survey respondents¹: Municipality residents' opinions 1 year after the outbreak of the war in Ukraine (N=206)

Category	Subcategory	Per cent
Age in years	18–24	9.2
	25–34	13.6
	35–44	20.9
	45–54	17.5
	55–64	14.6
	65 and over	24.3
Gender ²	Women	53.9
	Men	46.1
Education ³	Higher education	25.0
	Secondary education	36.0
	Vocational education	34.0
	Primary education	4.9
Main source of income ⁴	Retirement pension/benefit	27.7
	Public-sector employment	18.9
	Self-employment	8.7
	Farm income	2.9
	Private-sector employment	33.0
	Other	8.7

Source: the survey *Opinie mieszkańców gminy Pleszew w rok po wybuchu wojny na Ukrainie*.

Notes: ¹ Respondents of the survey conducted with refugees from Ukraine in the Orlin Municipality (November 2022); ² 77 per cent women (women make up 73 per cent of the refugee population); ³ 40 per cent of respondents have higher education, 33 per cent have secondary education (general and vocational); ⁴ 45 per cent came from medium-sized towns and 12 per cent from rural areas; ⁵ 80 per cent of respondents do not have a driving licence.

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Barriers to Higher Education for Beneficiaries of International Protection: A Policy Perspective from the Czech Republic

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The Czech Republic provides international protection to a small number of individuals. This research aims to study the barriers that beneficiaries of international protection (BIPs) face in accessing higher education and to examine which policies affect the opportunities that are available to them. The findings are based on the experience of frontline workers. According to previous studies, most of these barriers are embedded in institutional policies, which may contribute to exclusion from higher education. The barriers which BIPs encounter in accessing higher education have not been investigated in the Czech Republic. This study's findings reveal many barriers to access to higher education and a lack of supportive policies. In addition to problems like a lack of language proficiency, the recognition of previous education and financing, BIPs have mental-health issues and face a lack of societal cooperation. These barriers make it difficult for them to pursue higher education. Frontline workers acknowledge all these barriers and agree that no strategies are in place at the national level or at higher education institutions to assist in the higher education of BIPs. To improve access, the government, higher education institutions and local stakeholders need to take action.

Keywords: beneficiaries of international protection, Czech Republic, higher education, barriers, access to education, policies, frontline workers

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Introduction

Since the 2015 refugee crisis, integrating refugees has been one of the main issues confronting host societies. The United Nations High Commissioner for Refugees (UNHCR) considers higher education (HE) as an option for integrating refugees into host societies (Damaschke-Deitrick and Bruce 2019). The United Nations Educational, Scientific and Cultural Organization (UNESCO) defines higher education as encompassing all types of education provided by universities and technological institutes. It encompasses International Standard Classification of Education (ISCED) levels 5 to 8. Higher education (HE) is a central component of integration that promotes a sense of inclusion among refugees and allows them to better adjust to the host society. It enables refugees to increase their problem-solving skills and develop new competencies with which to reconstruct their lives in host societies (Kondakci, Kurtay, Kasikci, Senay and Kulakoglu 2023; Molla 2022). Refugees' access to HE is more limited than that to elementary and secondary schools (Dryden-Peterson and Giles 2010). According to UNHCR data (n.d.), as of 2023, only 7 per cent of refugees are enrolled in HE globally. This figure is less than the UNHCR's commitment to ensuring that 15 per cent of refugees globally have access to HE by 2030.

Additionally, over time, much research has been published to inform policy, examining the barriers (e.g., financial, lack of appropriate information and guidance) which refugees experience while accessing HE (Lambrechts 2020). In Europe, the development and implementation of appropriate policies for granting refugees access to HE have been insufficient and inconsistent (Eurydice 2019). We chose to study the barriers to access to HE in the Czech Republic because it is a country that relates its migration policies to security threats (especially since 2015). It perceives migration as a threat to the state and Czech culture, while failing to recognise the benefits of migration for the Czech economy (Jelínková 2019; Kušniráková and Čížinský 2011; Stojanov, Klvaňová, Seidlová and Bureš 2021; Zogata-Kusz 2020).

Furthermore, the Czech Republic has a limited number of asylum-seekers (in 2023, just 1,427 applications were received for international protection), most of whom are from Turkey, Ukraine and other post-Soviet countries (Český Statistický Úřad 2025; CZSO 2022; Jelínková 2019). Asylum-seekers are individuals who seek international protection abroad and whose claims have not yet been decided (Pasetti and Conte 2021: 350). Most recently, the Czech Republic provided temporary protection to more than 394,985 Ukrainian refugees (European Commission 2025) but we are not focusing on temporary protection-holders in this study. We are studying only those granted international protection because gaining international protection is a more complex and time-consuming process. Generally speaking, only 0.3 per cent of the approximately 650,000 foreign residents of the Czech Republic are holders of international protection. For every 10,000 inhabitants, about 2 are under international protection. Despite their relatively small number, there are valid grounds to research the integration of international protection-holders (Andrle, Čechová and Novotný 2022). Although the integration system for international protection-holders has existed in the Czech Republic for nearly 33 years, it has never been organised in terms of priorities. Furthermore, given the current focus on Ukrainian refugees, the integration of international protection-holders has become less relevant for policy-makers (Andrle *et al.* 2022). In contrast, an assistance centre was established for Ukrainian refugees in each of the 14 regions of the Czech Republic to arrange documentation for residency, health insurance and employment-office registration. The Czech Republic has launched a separate strategy for integrating Ukrainian refugees, which involves the efforts of crisis teams, members of the public, volunteers, civil society groups and municipalities (Jelínková, Plaček and Ochrana 2023). Additionally, Ukrainian refugees have received

significant assistance from universities, such as admission to HE without tests, with scholarships and Czech language courses (Akbaş 2024)

Moreover, like other countries, the Czech Republic provides 2 types of international protection: asylum – which grants permanent residency in the Czech Republic – and subsidiary protection – which grants long-term residency there. A subsidiary protection-holder can apply for permanent residency after 5 years of stay but the same integration policies are used for both. Firstly, the Czech Republic provides asylum to those individuals who face persecution for practising their political rights and freedoms or who have a legitimate fear of persecution because of their race, religion, nationality or affiliation with a social group. Secondly, the Czech Republic provides subsidiary protection to those individuals who do not meet the asylum requirements but who could be in danger if they return to their country (MVCR 2024). The Czech Republic has a limited number of international protection-holders while applying an increasingly selective approach to them (CZSO 2022). We use the term ‘beneficiaries of international protection’ (BIPs) for those granted refugee status and subsidiary protection (Pasetti and Conte 2021).

In this article, we are interested in examining what kinds of barriers BIPs face in their access to HE and how integration policies help BIPs to overcome them. These barriers are studied based on the perceptions of those working with BIPs, such as social workers, a methodologist, a project leader, Czech language teachers and university employees. We call them frontline workers. The primary contribution of our study is that, at least to our knowledge, it is the first on the subject. Moreover, the HE of BIPs is not a significant concern for policy-makers at the national level because of the low number of BIPs and because policy-makers lack experience with the related policies. For this reason, we may assume that there will not be much effort made to integrate BIPs into HE in the near future. However, Czech policy-makers have not yet been the subject of research. It will be interesting to see whether frontline workers reflect on the barriers faced by BIPs and the lack of appropriate policies, because the former may be considered as the experts in the field. If they identify a lack of appropriate policies through which to remove the barriers which BIPs face in accessing HE, this could be the first step towards policy change as result of ideational change and policy learning.

The paper proceeds as follows: the first section reviews the literature on barriers to HE and related policies. It also describes the Czech Republic’s perspective on BIPs. The second section explains the methods of research and analysis, while the third presents the findings, revealing the barriers to HE and analysing the relevant policies. The final section includes a discussion and conclusion and calls for action to reduce barriers to HE and provide equal opportunities for BIPs to access HE.

Literature review

Access to HE is critical to ‘restoring hope in the lives of refugees through education’ (Lenette 2016: 1313). HE can offer opportunities to become familiar with the language and sociocultural norms of the host country. Despite the documented benefits of HE, significant barriers often prevent BIPs from accessing it (Baker, Ramsay and Lenette 2019), most of which are embedded at the national level and in HE institutional policies, thus directly or indirectly contributing to excluding BIPs from HE. For instance, most host countries have policy measures in place to utilise BIP knowledge in the labour market; however, institutions that provide language instruction in the host country may structure their courses of study to meet labour-market requirements rather than always attracting students to HE (Koyama 2015).

Understanding the barriers to access to HE is necessary, practically guiding policymaking, as ‘it contains its solution – the removal of the barriers’ (Gorard, Adnett, May, Slack, Smith and Thomas 2007: 5). It is also essential to comprehend HE policies in order to determine whether or not they address these barriers. Since the 2015 refugee crisis, various national governments and HE institutions have launched initiatives to help BIPs to access HE (Abamosa 2023; Goastellec 2018; Stevenson and Baker 2018). To explain the barriers and policies revealed in previous research, we cluster the barriers into the following categories: language barriers, recognition of education, finance, inadequate education, misinformation, family responsibility, discrimination, gender and culture and bureaucracy.

BIPs may not always possess the language skills necessary to meet university admission requirements (Crea 2016; Lambrechts 2020; Saiti and Chletsos 2020; Streitwieser, Schmidt, Gläserer and Brück 2018). To address this issue, some countries have introduced policies and programmes that enable BIPs to gain the language proficiency required for HE (Abamosa 2023; Goastellec 2018; Kontowski and Leitsberger 2018; Streitwieser, Brueck, Moody and Taylor 2017). However, these language programmes often have limitations and are subject to specific criteria, such as meeting the university requirements for admission. BIPs can only attend these courses if they meet the criteria. Thus, universities restrict access to language courses (Abamosa 2023).

Another barrier is the difficulty in gaining recognition of previous education, especially for those BIPs who have completed all the academic requirements and earned degrees in the past but cannot continue HE. BIPs cannot directly continue their HE in host societies; they must first go through a lengthy process to get their previous degrees recognised (Berg 2018; Dryden-Peterson and Giles 2010; Grüttner, Schröder, Berg and Otto 2018; Loo 2016; Morrice 2013; Saiti and Chletsos 2020). While some countries have introduced policies to facilitate the recognition of BIPs previous education, the process remains fragmented and insufficient, often failing to address their needs (Ashour 2022; Eurydice 2019; Jungblut, Vukasovic and Steinhardt 2020; Sontag 2019).

BIPs usually have insufficient funds to obtain HE in the host country and a lack of documentation, such as birth certificates, can make them ineligible for scholarships to support HE (Berg 2018; Dryden-Peterson and Giles 2010; Lambrechts 2020; Loo 2016; Morrice 2013; Saiti and Chletsos 2020). Some countries offer scholarships and fee waivers to BIPs to help them overcome the significant financial barriers (Abamosa 2023; Eurydice 2019; Goastellec 2018).

Another barrier confronts BIPs when there is a gap in their educational biography. BIPs spend a significant portion of their time in refugee camps, which causes an interruption in their education (Massa 2023; Stevenson and Willott 2007). Attending HE can be challenging for BIPs because some camps only offer an inadequate level of elementary education (Crea 2016; Wright and Plasterer 2010), with HE institutions not usually recognising camp education at all (Zeus 2011). Few European universities recognise and address this barrier by providing bridging and academic courses (Abamosa 2023; Goastellec 2018; Streitwieser *et al.* 2017).

BIPs also face misinformation in their access to HE, due to which many cannot navigate their educational pathways and get professional support. Misinformation also affects the mental health of BIPs because they feel frustrated and confused about accessing accurate information (Bajwa, Couto, Kidd, Markoulakis, Abai and McKenzie 2017; Joyce, Earnest, Mori and Silvagni 2010; Morrice 2013; Shakya, Guruge, Hynie, Akbari, Malik, Htoo, Khogali, Mona, Murtaza and Alley 2012; Stevenson and Willott 2007; Stevenson and Baker 2018). According to Streitwieser *et al.* (2017), some HE institutions provide information about HE studies primarily in the national languages and in English for BIPs. However, many of these BIPs face challenges in accessing information in their native languages, thus limiting their access to HE opportunities (Abamosa 2023; Sontag 2019; Streitwieser *et al.* 2017).

Other barriers confronted by BIPs include family responsibilities, prejudice against them and challenges related to gender and culture (Shakya *et al.* 2012; Watkins, Razee and Richters 2012). While some universities host cultural events to lessen prejudice towards the different cultures, their policies do not consider family responsibilities (Jungblut *et al.* 2020; Sontag 2019).

Lastly, BIPs can encounter a bureaucratic barrier that affects access to HE. For instance, the time needed to fulfil the requirements for social benefits may conflict with the necessary preparatory classes to access HE (Berg 2018). However, we have not discovered an HE policy that addresses family responsibilities and bureaucratic barriers.

Only a few countries have implemented supportive measures, while most are trailing behind in facilitating access to HE. For example, Slovenia planned to develop HE policies for BIPs but the number of applications for HE is declining, resulting in a lack of policies (Beznec and Gombač 2023; Eurydice 2019). However, there are several reasons why governments and universities adopt measures to provide BIPs with access to HE. France has developed the measures based on human rights, while Germany focuses on creating measures that encourage peace and integrate BIPs into the labour market (Eurydice 2019; Goastellec 2018; Streitwieser *et al.* 2017). Many countries have no policies because the HE of BIPs is left to university initiatives and many BIPs have been resettled only in a few countries of the EU (Eurydice 2019). The studies mentioned above do not include detailed information about the Czech Republic, **thus** our study contributes to the existing body of knowledge and provides an understanding of barriers and policies based on the experiences of frontline workers.

The Czech Republic's perspective on BIPs

During the 2015 refugee crisis, the Czech Republic made a significant effort to discourage BIPs from entering the country by portraying them as a security risk and an administrative burden assigned by the EU (Jelínková 2019; Stojanov *et al.* 2021). Though the country's Muslim population is approximately less than 1 per cent, the rapidly expanding Islamophobic movement and the opposing political message, which associated Islam with BIPs attracted a lot of media coverage and public support (Jelínková 2019; Vogel 2018). Further, strict Czech asylum policies also show the unwillingness to accept BIPs (Drbohlav and Valenta 2014). The country's asylum policies are as follows: asylum-seekers are prohibited from working for 6 months. If asylum applications are rejected, which happens in 91 per cent of cases (WorldData.info 2025), the courts do not have the authority to decide on these rejected asylum applications. During an appeal, the court evaluates the reasons for the rejection but the final decision remains with the Ministry of the Interior. Courts can request that the Ministry of the Interior review the asylum applications, the process for which starts over again after the decision returns from the court (Jelínková 2019).

The Czech Republic has different integration policies for BIPs and immigrants from non-EU countries. The integration policy for BIPs is called the State Integration Programme (SIP); the new SIP was introduced in 2015 and came into effect in 2016. The legislation defines the tools for integration. The Asylum Act (Act No. 325/1999, Coll., on Asylum) addresses integration in Chapter IX, titled 'SIP'. It is a brief regulation, including only 3 provisions (Sections 68–70). BIP participation in SIP is voluntary. The SIP applies to fewer than 500 people each year. SIP services are available for only 12 months and are provided based on individual integration plans. After 12 months, those implementing this programme ignore the integration of BIPs because the SIP has terminated assistance services except for language courses (Andrle *et al.* 2022; Dohnalová 2021). The SIP focuses on 5 major areas: health, education, social services, housing and employment. It assists BIPs in registering with the public health system and helps them to find doctors. Under the Ministry of Education,

the SIP provides 400 hours of language classes, though this is not the highest number in the EU (for example, it is 700 hours in Sweden). The classes are insufficient, particularly for those from different cultures. The SIP provides assistance with filling out an application for the recognition of education and the application of social benefits. Obtaining proof of lawful employment from their country of origin is challenging for senior BIPs, particularly regarding pension claims (Andrle *et al.* 2022). To qualify for a pension, they are required to provide evidence of their prior lawful employment. However, obtaining this documentation can be difficult, as they may be unable to return to their country of origin or contact their embassy for assistance (Icpraha 2025). While BIPs are entitled to the same social benefits as Czech citizens, many struggle to meet the eligibility criteria for unemployment benefits, especially those who have not worked in the Czech Republic and who worked illegally during the asylum process (Andrle *et al.* 2022). Unemployment benefits are only available to those who have worked for at least 12 months within the previous 24 months (Úrad Práce 2019). As a result, BIPs can rely solely on material-need benefits, which cannot be considered a fully-fledged solution to their life situation (Andrle *et al.* 2022). BIPs can be accommodated in the integration asylum centre (*Integrační azylové středisko*) for up to 18 months. The SIP assists in finding rental accommodation, covers the advance payment for flats, 2 months' rent and the real-estate company's commission (Dohnalová 2021). BIPs are impacted by insufficient housing and steadily rising rents, since they cannot afford expensive residences. Despite all the help provided, they still fall into the lower-income portion of the population long-term, being affected disproportionately. Although finding work is facilitated by the SIP, it is challenging for subsidiary protection holders to secure long-term jobs because they have only a 2-year resident permit – although an extension is possible (Andrle *et al.* 2022).

The services of this programme are given by a general provider known as the Refugee Facilities Administration of the Ministry of the Interior. This latter has social workers who work in the SIP. The general provider provides services to BIPs with the cooperation of other entities, such as municipalities, ministries and non-governmental organisations (NGOs), which play an essential role in integrating BIPs and implementing this programme (Dohnalová 2021; Integracní programme 2017). The SIP language programme is provided by an NGO known as the Association of Teachers of Czech as a Foreign Language (*Asociace učitelů češtiny jako cizího jazyka*).

Additionally, HE policies exist for BIPs, according to which they can study in HE institutions (asylum-seekers can also study). This entitlement is primarily based on the right to education (UNHCR 2016). Access to HE is difficult for BIPs, as they must navigate a set of predefined admission procedures, with few exceptions and limited active support measures available to them. BIPs can gain university admission only if they have primary- and secondary-school certificates. Additionally, universities may require them to pass an entrance exam in Czech and pay an admission fee (Bačáková 2022). BIPs can choose between English- and Czech-language programmes; they must pay a tuition fee for the English-language programmes, while study in the Czech programme is free. BIPs need recognition of their previous education if they wish to enrol at university. They can apply to the regional office (*školský odbor krajského úřadu*) for recognition of their primary and secondary education. It is important to note that access to elementary and secondary schools poses a significant barrier for BIPs. BIPs older than 17 are not permitted to attend compulsory education and no separate programmes are available to assist them in completing it. They can access secondary schools only after completing compulsory education or obtaining recognition of their school certificates. Additionally, BIPs encounter other challenges when accessing secondary education, such as the requirement to pass entrance exams and attend interviews conducted in Czech. Furthermore, the rector's offices, faculties and the Ministry of Education can recognise applications for previous university education (Bačáková 2022). There are a few specific rules for BIPs – for instance, if they are missing any documents, they can replace them with a statutory certificate of

honour during the process of the recognition of previous education (UNHCR 2016). Additionally, Czech universities offer preparatory language courses but these are not free for BIPs (Bačáková 2022).

Compared to the previously discussed policies for BIPs, Ukrainian refugees with temporary protection have received tremendous support from universities. Numerous active support measures have been implemented to facilitate their access to HE. In 2022, many universities in the Czech Republic admitted Ukrainian refugee students during special admission periods outside the regular application times. This policy enables the refugees to enrol immediately upon arrival, without the need to take entrance exams or pay admission fees (Bačáková 2022; Muni 2025). Universities also offered free Czech language courses and scholarships funded by the Ministry of Education (Akbaş 2024). Additionally, they are exempt from any fee for the recognition of previous education (Bačáková 2022).

Moreover, the arrival of Ukrainian refugees has shown a remarkable turn in political and public attitudes. This change is evident in the integration policies introduced in response to their presence (Jelínková *et al.* 2023). They can stay in free state humanitarian housing for up to 90 days, receive social protection benefits and access additional assistance such as social counselling, language classes and integration activities (UNHCR 2024a, 2024b, 2025). Prior to their arrival, the government paid little attention to migrants' integration. Although this topic became important in 2015, it mainly raised negative perceptions of BIPs. In contrast, in response to the arrival of Ukrainian refugees, the government's approach shifted to a welcoming stance (Jelínková *et al.* 2023). The officials stated, 'There is no us or the Ukrainians. Ukrainians are welcome in the Czech Republic' (Rakušan 2022).

Methods

In this study, we build on grounded theory (Charmaz 2006). The data were collected through semi-structured interviews (Longhurst 2003) conducted between June and December 2023 in 5 Czech cities: Prague, Brno, Ústí nad Labem, Olomouc and Ostrava. The interviews involved 15 frontline workers who support the integration and HE of BIPs in the Czech Republic. These cities were selected because they host a significant number of BIPs and the frontline workers who support them are located there. While some BIPs live in remote areas, they are integrated by frontline workers from larger cities. For example, the Czech language teachers occasionally travel to remote areas to provide language instruction to BIPs. It is more practical for frontline workers to meet BIPs at the latter's residence rather than renting an office for language instruction. Few frontline workers are working with BIPs and for this reason we have a limited number of interviewees.

These interviewees were selected through purposive sampling (Etikan, Musa and Alkassim 2016) and snowball sampling (Naderifar, Goli and Ghaljaie 2017) techniques. Using purposive sampling, we selected those respondents who could provide relevant information about the problems under study based on their knowledge and experience. We identified these respondents using the SIP, universities and NGO websites. Using the snowballing technique, the already-selected participants helped us to contact others who were working with BIPs. The respondents were working in different positions and included 6 social workers, 4 university employees, 3 language teachers, 1 SIP methodologist and 1 SIP project leader. There were 12 women and 3 men. All respondents had some shared characteristics. They were working with BIPs, were engaged with state and local authorities about BIP integration and were aware of the policies, integration and HE.

In this study, we do not present the experiences of BIPs for 3 reasons. Firstly, we focused mainly on assessing the policies. Secondly, we wanted to gain insight into the barriers set by the representing institutions and who are responsible for implementing integration policies as the experts in the field.

Thirdly, we had difficulties reaching BIPs for interviews, despite efforts to contact them through existing research participants. Although 2 BIPs initially agreed to participate in the research, they withdrew their consent before the interviews. Several factors contribute to the lack of BIPs' participation, including trust issues and their insufficient representation within Czech society.

Before gathering data, we received ethical approval from the Ethical Committee at the affiliated university (Reference No. EKV-2023-012). In the invitation email for the interview, participants were made aware of the research's aim and were given the option to choose between an online and an offline interview. The approval from the ethics committee was attached to the email. Zoom was used for 3 online interviews, while in-person interviews were conducted with 12 respondents. Before starting the online and in-person interviews, we asked respondents to sign a document of consent to participate in the research and the processing of personal data. We obtained consent by email from those respondents who agreed to an online interview. Respondents were informed that their participation in the research was entirely voluntary and they had the right to withdraw their statements at any time without any consequences. All collected data were anonymised during transcription to protect the participants' identities. Only the researcher had access to the raw data, such as audio recordings; any personal information was removed or replaced with pseudonyms.

The interview schedule consisted of 15 open-ended questions designed to gather detailed information about the barriers faced by BIPs. These questions addressed various topics, such as respondents' working positions, their activities regarding BIPs, the barriers related to HE for BIPs, policies related to BIPs' access to HE, policies related to the HE and integration of BIPs and support from government and universities to enable BIPs to overcome the barriers in their access to HE. To encourage the respondents to provide more detailed information about the barriers, each open-ended question was followed by a probing question. For instance, one probing question was: Why are policies for BIPs insufficient at universities? It allows respondents to reflect on broader institutional and social barriers. The interviews lasted from 60 to 90 minutes and were audio-recorded and transcribed. When no new information was generated and data saturation was complete, we stopped gathering data (Charmaz 2006; Hancock, Amankwaa, Revell and Mueller 2016).

Participants were also asked about their awareness of how similar barriers are addressed in other European countries. However, many were unable to provide a comparative analysis of HE policies. It highlights a lack of understanding, a limited transfer of knowledge from other countries and insufficient awareness and training on how to address the barriers to HE. While the study focused primarily on policy-level perspectives, respondents were not explicitly asked about the educational aspirations of BIPs or their efforts to seek information about HE. However, some participants noted that few BIPs had pursued HE as part of their initiatives. Since these comments were brief, we did not explore them further. Future research should investigate the educational aspirations of BIPs and assess how well current support systems meet those aspirations.

The data were analysed using grounded theory (Charmaz 2006). We used NVivo software for the analysis in order to ensure the process' credibility, speed, flexibility and transparency (Costa, de Sousa, Moreira and de Souza 2017). Three coding steps – initial, focused and axial – were followed to analyse the data. The data gathering and analysis followed a cyclical process, with categories that emerged from the data leading to more-focused data collection. We also sent transcripts to respondents for review before starting the analysis. It allowed them to provide additional information on specific issues. In the initial coding, we reviewed the interview recordings, examined the transcripts line by line and categorised the data based on themes that emerged from each interview and which were common among the research participants. The emergence of initial themes also prompted us to conduct a deep

data analysis and follow-up email conversations with respondents. Although only a few participants were available for follow-up interviews due to time constraints, many were willing to cooperate via email. This approach added greater depth and clarity to the study. In the focused coding, we selected the most common codes. By systematically examining the data, we revealed similarities and differences between codes. In the axial coding, we linked categories with subcategories, facilitating a deeper understanding of their relationships and structuring the findings (Charmaz 2006). During each coding step, we recorded our observations by adding annotations to the nodes. We also used mind maps to understand the deeper meanings, explore the connections between the data and group the identified barriers.

Both inductive and deductive reasoning were used to analyse the data, guided by grounded theory. While inductive analysis is emphasised in grounded theory (Charmaz 2006), our study also included deductive reasoning guided by the literature review, which identified several barriers that BIPs face when accessing HE, such as language proficiency and bureaucratic obstacles. These categories informed the initial coding stage. Additionally, they were useful in analysing the data, while we remained open to the emergence of new codes based on them. Inductive analysis enabled new themes to emerge directly from the data. For example, although language acquisition was expected to be central, new themes such as societal and community barriers, insufficient university policies and gaps in mental health care emerged strongly across the interviews.

The final categories reflected the 5 analytical foci of the study: (1) language, (2) recognition of previous education, (3) finance, (4) mental health and (5) society and community. These categories structured the presentation of our findings. The analysis resulted in 13 conceptual categories organised across 5 analytic domains, which correspond to the study's research questions:

1. Language (limited access to language programmes and classes; challenges with exam preparation; lack of community support);
2. Recognition of previous education (long and complicated recognition process; inadequate policies);
3. Finance (support restricted for SIP participants; personal finance to access HE; insufficient housing; insufficient scholarships and student loans);
4. Mental health (inadequate mental health services; insufficient institutional policies); and
5. Society and community (social exclusion; integration into cultural communities).

These categories are presented below and organised according to the 5 analytical foci. Each data quote will be referenced with an identifier (e.g., R1 for Respondent 1).

Findings

In this section, we explain the barriers which BIPs encounter in their access to HE, the policies available to them and, finally, an assessment of the policies based on the knowledge of frontline workers.

Language

All frontline workers highlighted that language is a critical barrier to BIPs accessing HE. However, several respondents (R1–10, R11, R13, R14) mentioned that the SIP language programme does not focus on teaching language for HE, which is at the B2 level, because participation in this programme is

voluntary. Frontline workers (R1, R3, R7, R8) mentioned that the purpose of the SIP language programme is to teach basic Czech and improve only by 1 level of Czech. For example, if someone has an A0 level at the start of the course, it should be at A1 at the end. The findings show that the many frontline workers (R1–R7, R9–R15) believe that BIPs can find a place in society with basic language skills. As explained by one frontline worker (R6): ‘One woman now works at Kebab; she took 400 hours of language classes. She understands and communicates with people in the Czech (language)’.

Four respondents (R11, R15, R3, R9) noted that, if BIPs are interested in learning the Czech language for HE, they can study on paid university-intensive Czech language courses and paid language classes outside the university. This indicates that the available support for integration offers little opportunity for BIPs to gain the required language competency for HE.

Frontline workers (R2, R4, R8, R9, R11–R14) mentioned how challenging it is for BIPs to study for the exams required for the recognition of education (primary and secondary education) without language proficiency. Recognition of education through exams is necessary because, through these exams, BIPs can get the certificates required for admission to a Bachelor’s degree programme. Four respondents (R1, R4, R11, R15) mentioned that the exam preparation materials and literature are usually in Czech. BIPs have the right to use a language interpreter for the exam. However, respondents R9 and R15 pointed out that finding one is challenging because language interpreters are not usually available in all cities. One respondent (R15) noted that there are only a few interpreters for some special languages, such as Burmese. As frontline worker R15 explained: ‘We had refugees from Myanmar but there were only 2 interpreters of Burmese in the Czech Republic’.

Unsurprisingly, frontline workers (R1, R4, R11, R15) mentioned their lack of communication with BIPs due to the language barriers. Therefore, they stated that limited language proficiency prevents BIPs from obtaining the information required for HE.

Recognition of previous education

All frontline workers indicated that recognition of previous education is another barrier for BIPs because it is a complicated process and not many BIPs can easily go through it. BIPs must present education-related documents and take qualification tests in the Czech language. Several frontline workers (R1, R2, R4, R6–R9, R11–R14) mentioned various types of recognition of previous education: (a) BIPs need compulsory-education certificates from regional offices of the city; (b) they need secondary-school certificates from regional offices of the city; and (c) if BIPs have Bachelor’s and Master’s degrees, the university can recognise these degrees. Six respondents (R1, R7, R9, R12, R13, R15) explained that there are 2 types of recognition of university degrees: nostrification and verification. University rectors’ offices can grant nostrification according to the rules provided by the Ministry of Education and university faculties authorised by the Ministry of Education can verify the documents. Four respondents (R1, R7, R9, R12) further clarified that faculties can also verify school certificates and degrees; this process is only for accepted students and enrolment in the faculty. The faculty recognition for enrolment cannot be used for other universities and work. The documents are recognised within 30 days but, in some cases, the process can take up to 60 days.

Twelve (R1–R9, R12–R14) respondents noted that no policy exists to grant admission without the recognition of previous education because universities have no specific guidelines for BIPs from the government. BIPs cannot access compulsory education after the age of 17. Those with a school certificate can get recognition for it, as confirmed by 2 respondents (R7, R15). These respondents also noted that BIPs can attend high schools beyond the ages of 18 or 19. Some private schools also allow

older students to enrol in secondary education and provide distance-learning options, which shows that there is no age limit for high school. The only barriers to enrolment are schools' certificates and language proficiency. Additionally, suppose a BIP loses some school certificates that indicate the holder's level of education. In that case, 6 respondents noted (R5, R6, R9, R12–R14) that they can replace documents with a declaration of honour because asylum policies do not allow them to contact the refugees' home countries for documents. They mentioned that a declaration of honour must include a detailed description of school education in terms of content and scope (e.g., hourly subsidy) and all documents should be submitted only in Czech. Six respondents (R4–R7, R13, R15) highlighted that, based on methodological requirements, the regional office may request additional documentation. Applications for the recognition of previous education applications will be rejected if the regional authority determines that the scope of education differs from that of Czech schools. If the authorities discover little difference, they may ask for further testing. The regional authority decides the specific subject of the examination.

Similarly, 4 respondents (R1, R7, R9, R12) noted that BIPs can replace documents with a declaration of honour if they do not have an original copy of their HE diploma, such as a Bachelor's degree. The declaration of honour must include a detailed description of the university degrees, the field of study, hours, credits gained and grades – and all the documents should be in Czech. Two respondents (R1, R12) highlighted that sometimes the university rector's office also requires the syllabus of the courses in the field of study because the recognition of HE entails comparing the scope and content of the education obtained abroad with a study plan provided by a Czech university. They further indicated that a Czech university will reject the application if it is determined that there are significant variations between the study programmes or if the diploma was awarded by an organisation that is not acknowledged as a university in the applicant's home country. Additionally, degrees and transcripts are required if they have study documents with them. If these documents are not notarised from the home country, BIPs could provide a decision on international protection with documents and there is a possibility of an exception to notarise. Four respondents (R1, R7, R9, R12) noted that the Czech Republic also has bilateral legal aid agreements with some countries, including Ukraine and Uzbekistan. In this case, BIPs can present documents without apostille and legislation. Moreover, 3 respondents (R1, R7, R12) highlighted that, if BIPs studied a subject that is not offered in Czech universities, they need to apply for a recognition of education at the Ministry of Education. Additionally, 8 respondents (R1–R4, R12–R15) noted that recognition of education is necessary for work and that the policy to replace some documents with declarations of honour has not necessarily been developed for HE. Two respondents (R4, R13) highlighted that the recognition of education based on a declaration of honour also depends on officials' willingness to verify the information and further work with it.

Finance

Thirteen frontline workers (R2–R11, R12–R14) brought up the financial concerns that gaining recognition of education and paying university tuition and language-course fees acted as barriers to HE. They mentioned that BIPs have to pay for the recognition of education. The state pays for those in SIP but not all BIPs join this programme. Payments become an issue for those not in SIP and who have already completed it. Ten respondents (R2–R11) explained that the amounts varied depending on the level: primary- and secondary-school certificate recognition from the regional office costs CZK 1,000 (per certificate), equal to EUR 40.44. The recognition of Bachelor's and Master's degrees from the

university rector's office costs CZK 3,000 (EUR 121.13) for each degree. Verification from university faculty costs CZK 150 to 500 (EUR 6.04 to EUR 20.04).

Further, frontline workers (R5–R9) mentioned that BIPs must pay admissions application fees for English and Czech programmes, which cost CZK 500 to 1,000 (EUR 20.22 to EUR 40.44). Two respondents (R13, R15) highlighted that BIPs also need an English-language certificate, such as the International English Language Testing System (IELTS), which costs CZK 6,600 (EUR 266.78) and a B2 Czech-language certificate, which costs CZK 4,000 (EUR 161.68). All respondents noted that BIPs must pay English-language programme fees because, in these programmes, they are considered as international students. Seven respondents (R1–R4, R10–R12) clarified that fees differ for each university faculty, ranging from EUR 2,500 to EUR 3,500 for an academic year. In some fields, such as medicine, pharmacy and data analytics, the fee is around EUR 7,000 to EUR 14,000 for an academic year. Therefore, all our respondents confirmed that those BIPs who do not have sufficient funding cannot afford the English-language programmes.

Additionally, 9 respondents (R4–R9, R11–R13) mentioned that many free basic-level language courses are available while many high-level language courses are expensive. These respondents reported that an individual lesson cost CZK 800 to 900 (EUR 32.34 to EUR 36.39) and a group lesson cost CZK 500 to 600 (EUR 20.22 to EUR 24.26). Four respondents (R1, R7, R9, R12) further noted that university-intensive Czech language courses typically last a year; tuition costs are about CZK 100,000 (EUR 4,043.40).

Consequently, all respondents confirmed that those BIPs who want to study on English-language programmes have to pay from their own finances. Due to these financial issues, some BIPs concentrate on getting any available job rather than HE studies. However, the 5 frontline workers (R6–R8, R13–R14) observed that only those BIPs who have lived in the Czech Republic for a long time are studying at universities. They are motivated and have earned or saved money for their studies. This indicates that BIPs know that they might not obtain exceptional support for their HE. As one frontline worker (R7) explained:

I know that we have some students who are already under international protection but, as I understood it, they have already been here for several years and I can understand that it is just because they submitted the document from the Czech Ministry of the Interior about international protection but they did not ask for any special process (...). They are on an English-language programme.

The 6 frontline workers (R2, R5, R6, R8–R10) also mentioned that the state does not provide free housing for BIP families; even if they live in integration asylum centres (*Integrační azylové středisko*), they must pay rent (a fee); this is determined by the size of the apartment and the consumption of gas and electricity. Additionally, 4 respondents (R1, R7, R9, R12) further noted that BIPs also need to pay for accommodation in university dormitories if they stay there for their studies. They noted that accommodation scholarships are available at universities but the amount is limited, such as CZK 3,000 (EUR 120.21) per semester. With this scholarship, students cannot pay even 1 month's dormitory rent.

All respondents confirmed that there are no special scholarships, student loans or social benefits available for BIPs. The Czech Republic provides very limited material-needs benefits, such as CZK 4,470 (EUR 180.76) monthly for the first adult member in the family. Full-time students living with their parents are regarded as dependent family members and are not eligible for benefits. If the parents' income is insufficient (below the subsistence minimum threshold), they can get benefits but full-time students living with their parents cannot.

Unsurprisingly, 8 frontline workers (R1–R4, R7–R10) mentioned how financial issues in the SIP system create cooperation problems with BIPs. They indicated that their clients considered social workers to be responsible for funding. In reality, social workers receive funding and instructions from the SIP for each individual and they must follow strict rules on how to use the money. As a result, social workers occasionally cannot purchase items to meet BIPs' needs as they are not authorised to do so. These frontline workers also emphasised that 1 year is insufficient to address BIPs' needs for integration, as some of their needs fail to emerge during that time. Thus, the findings indicate that the people running this programme sometimes overlook the needs of BIPs. As one frontline worker (R4) explained:

There is always a specific list of things we can buy or provide and then you have students studying information technology and demanding laptops. The limit on buying a computer is CZK 13,000 (EUR 525.80) so, for this amount, you cannot buy a computer suitable for the needs of the students and you cannot change it.

Mental health

All frontline workers stated that mental-health issues are hindering educational opportunities for BIPs in the Czech Republic. They also mentioned that it is not easy for BIPs to get psychological help. According to them, one difficulty BIPs have in accessing psychological help is their lack of knowledge of the Czech language because many psychologists cannot speak other languages. Psychologists do not allow interpreters during their sessions. As frontline worker R1 explained: 'BIPs need psychological counselling but it is problematic for them because, in the Czech Republic, there are not many psychologists who speak their languages'.

Additionally, 4 frontline workers (R5, R9, R10, R15) mentioned that no specific psychological programme is available for BIPs. Ministry of the Interior psychologists are available only in residential and reception centres for asylum-seekers. R1, R7, R9 and R12 noted that, while some Czech universities offer psychological help for their students, the service is not mainly for BIPs. All respondents confirm that many Czech psychologists do not have training in the mental health of BIPs and these issues are not discussed in Czech society. Thus, the findings indicate that many Czech psychologists are unaware of the experiences, issues and histories of BIPs.

Society and community

Most of the frontline workers (R1–R8, R10–R15) mentioned that BIPs have limited opportunities for integration into Czech society, particularly in HE and social participation. However, this integration is not the main emphasis of the SIP because the integration programme stands aside from the social system. Thus, Czech society does not assist BIPs in locating the information they need to participate in HE. As explained by R10: 'They do not have an opportunity to meet Czech people who help them integrate into HE, so they try to choose their community'.

Three respondents (R2, R11, R15) emphasised that BIPs are socially excluded due to a lack of societal integration; the majority of them prefer to stay at home, do everything online and choose to remain with members of their cultural community. These frontline workers also observed that different refugee community groups do not motivate BIPs to focus on language and HE. Refugee communities prevent families from integrating into Czech society and encourage BIPs to work in restaurants and stores.

Discussion and conclusion

The findings of this study provide several key insights into barriers to BIPs accessing HE. Firstly, it is clear from the findings that the frontline workers acknowledged that the state has no measures, schemes or strategies for providing BIPs with access to HE. According to our respondents, the country's integration policy covers basic needs and prioritises labour-market integration by teaching basic language skills and making some exceptions for education recognition instead of focusing on HE. This is also apparent from legislation and policy documents. The drawback of the SIP is that it is based only on voluntary participation and is available for a period of 12 months, not more (except the language programme) – 1 year is too a short period for integration. Thus, the SIP does not fully address the needs of BIPs, such as providing scholarships for HE, teaching language for HE and making the admissions process more accessible. These findings may be explained by the restrictive and selective Czech asylum policy and the general aim of the government to grant international protection to few BIPs. The lack of integration policies characterises this restrictive immigration policy, including access to HE.

Secondly, the findings indicate that Czech HE institutions have no measures in place for BIPs and have no special government guidelines regarding them. Our results indicate that language and university policies are more important for HE studies than residence permits (asylum and subsidiary protection). BIPs can only apply for HE if they meet the admission requirements, such as language proficiency and a recognition of education; otherwise, admission is impossible. Those BIPs who study on English programmes must finance their own education because BIPs are considered international students.

Thirdly, mental-health problems influence language acquisition and HE and there are no special programmes supporting BIPs' mental health. However, Lenette (2016) mentions that focusing on the mental health of BIPs increases their socioeconomic opportunities and HE attainment. The findings reveal the chronic shortcomings of the Czech healthcare system, with a general lack of specialist doctors for BIPs, particularly in psychological and psychiatric care.

Fourthly, the lack of contacts and integrative activities with society and the refugee community are significant barriers to access to HE. There are no integration programmes that allow BIPs to interact with Czech society. Due to this, Czech society does not cooperate with BIPs in accessing HE and does not push the state and HE institutions to set policies to provide BIPs with access to HE. Streitwieser *et al.* (2017) mention that BIPs' access to education depends on state and institutional policies and is connected to the social fabric and their general presence in the host society. Social exclusion and an uncooperative society hamper learning and threaten the educational success of BIPs. Due to these boundaries between social groups, refugee communities motivate BIPs to work rather than focus on HE.

Additionally, when numerous barriers and insufficient policies exist for BIPs, all these barriers were removed for Ukrainian refugees, who benefit from special admission times, free language courses, scholarships, free housing and social benefits. Public and political attitudes have shifted positively towards Ukrainian refugees but similar changes have not occurred for BIPs.

The key limitation of this study is that it draws on the experiences of frontline workers, who offered valuable information about the barriers faced by BIPs during access to HE. The results are based on second-hand accounts and, therefore, may not accurately reflect BIPs' experiences. Consequently, the study excludes individual-level barriers that only BIPs can identify. Despite the limitations, the frontline workers highlighted numerous barriers and a lack of policies which could help BIPs to overcome the barriers. Without BIP participation, we cannot draw a general conclusion from the findings about what barriers exist in reality. However, the study findings are still relevant because frontline workers perceive barriers when working closely with BIPs and we consider them to be experts in the field. The frontline workers identified barriers that have

been recognised by many studies (as discussed in the literature review above). Most importantly, although frontline workers' assessments may not always be accurate, they acknowledge the barriers and explain why they exist. Consequently, we can interpret the findings as indicating a way forward for possible future policy progress. The knowledge of the frontline workers may help in implementing new measures and exerting pressure on the government and responsible bodies to provide more support for such measures. This first study on the access of BIPs to HE in the Czech Republic contains valuable information for the relevant agencies, policy-makers and institutions that could use this knowledge to make policy changes and develop new policies that could provide better access to HE. Additionally, there is a need for further studies on why neither the Czech state/ministries nor HE institutions consider BIP education to be their responsibility and how the other actors affect the policies.

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Educational Choices and Migration Aspirations: How do Young People from a Peripheral Area in Croatia Imagine Their Future?

Željko Pavić*, Mateo Žanić**, Ivana Bendra**

This paper explores how young people from a peripheral area in Croatia combine their educational and migration plans concerning the desirability which they attach to the local, national and global environment. A survey research study involved high-school students from Vukovar-Srijem County in Croatia (N=681), with the intention of ascertaining where they would like to study and where to live after completing their secondary education. Cluster analysis identified 5 groups of students and a multinomial regression analysis showed that the perception of the local developmental potentials, the quality of life and the students' value orientations significantly impact on their educational and life paths. The differences between young people who envisage their educational and migration paths leading them abroad and to other parts of Croatia and those who would like to stay in the local communities are particularly highlighted. Interviews with students confirmed that the differences between these groups indicate varying perceptions of the likelihood of developing a career in the local community, satisfaction with local higher-education possibilities and value differences that point to different preferred future lifestyles. The intention to stay in the local community is related to higher place attachment, traditionalism, and a lower preference for personal autonomy.

Keywords: young people, education, migration, Croatia, globalisation, peripheral area

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Introduction

Contemporary post-industrial societies have introduced a series of new uncertainties to human life, as changes in the different stages of life have become less predictable than they were (Bauman 2000; Giddens 1991, 2006). In such an uncertain context, planning for the future has become even more important. In this sense, it is unsurprising that more and more attention is being paid to how people combine geographical places, identity and mobility – what Gustafson (2001) calls ‘roots and routes’. At the same time, some people still care more about mobility and discovering new things, while others devote more interest to the events in local communities and show greater place attachment (Gustafson 2001; Lewicka 2011). Imagining the future in a social context filled with various risks is particularly challenging for young people, who are faced with important decisions related to where and how they want to live and concerning their education, becoming independent and finding employment. At the same time, the inclusion of the spatial dimension in the analysis of the desirable life paths of young people seems necessary in the time of the global processes that have facilitated the mobility of people (King 2018). In contemporary circumstances, people make their life decisions in a social context that is increasingly interconnected due to globalisation and in which various forms of mobility are facilitated or encouraged. In such circumstances, according to Appadurai (2005), the role of imagination also has changed. Imagination has become part of everyday lives, and more and more people are thinking about the possibility of the place of life and work being far from the place of birth (Appadurai 2005). This is particularly important for young people from peripheral areas since, when thinking about the future, they have to think not only about whether they want to change their place of residence to continue their education but also whether the peripheral areas offer them enough opportunities for continuing their education and career development (Meyer and Leibert 2021; Stockdale, Theunissen and Haartsen 2018).

One such area is Vukovar-Srijem County (hereinafter: VSC), in the Republic of Croatia. In Croatia, there exist substantial regional developmental inequalities (Akrap and Ivanda 2019; Kranjčević, Lukić, Kušen and Klarić 2014; Rihtar 2022). The counties located in Eastern Croatia are in a disadvantageous position involving several important criteria. According to a research study conducted in 2019, when assessing the quality of life in their town or municipality, 53 per cent of the residents of VSC rated it as worse than the Croatian average (Rihtar 2022). Consequently, according to the demographic estimates, from 2013 to 2018, about 200,000 people emigrated from Croatia (Akrap and Ivanda 2019), while the most unfavourable migration balance was recorded in the counties that belong to the area of Eastern Croatia. It is estimated that, in the period from 2014 to 2017 alone, some 14,482 people left VSC – mostly younger people (Živić 2019). The recent data point to a further deterioration of the extremely unfavourable demographic trends in the area (Živić and Šimunić 2024). All the listed indicators of the economic situation in the area of VSC, especially the continuously unfavourable situation on the labour market, are considered to harm the position of young people in the area and, for years, this county has been among those with the largest share of unemployed youth in Croatia (Croatian Employment Service 2020).

The main aim of this paper is to determine both how young people from a peripheral area imagine their future with regards to the combination of migration choices and educational aspirations and the extent to which individual characteristics and the features of the local environment influence their plans and aspirations. Therefore, the following research questions were posed in the paper:

1. What are the dominant ways of imagining the future concerning the combination of educational and migration plans for the young people in VSC?
2. To what extent do the demographic characteristics of young people, their personal values and the perception of the local community influence the combination of desirable educational and migration paths for young people from VSC?

To achieve this goal, a mixed-method approach, i.e. a combination of a research survey and interviews with secondary-school students, was utilised. The study's results should provide the insights that can help the VSC and similar peripheral areas, both in Croatia and elsewhere, to plan and implement policies that can help to improve the local migration balance by making the local communities more attractive to young people.

The structure of the rest of our paper is as follows. First, we provide an overview of research on the migration and educational aspirations of young people. After explaining the methodological framework of the paper, we present the main results of our quantitative research survey; we then discuss these results by comparing our results with previous research, additionally clarifying them using the results of our qualitative research. We conclude the paper by highlighting its main findings, policy recommendations and the limitations of the research.

Migration choices and the educational aspirations of young people

When researching the lives of young people, it is important to investigate how they imagine their future, where they would like to study and where they would like to live and work (Gruning and Camozzi 2022). Migration aspirations are one of the key elements of imagining the future of young people but they need to be explored more specifically in order to connect the different aspects of young people's lives with the spatial contexts in which they live (Carling and Collins 2018). It seems that young people from rural and peripheral areas are in a particularly complex situation, so it is not surprising that, recently, several studies have been devoted to their attitudes towards migration and planning for the future (Cuzzocrea 2018; Evans 2016; Farrugia 2020). Several studies have indicated various aspects of the quality of life (Farrugia 2020) and the lack of opportunities to develop a career (Evans 2016) as the key migration factors of young people from peripheral places. In addition, when interpreting the life plans of young people, it is necessary to consider how they perceive the local environment and the local community. In this context, concepts such as sense of community, social cohesion and place attachment give us a better understanding of the meaning of local social influences in a rapidly changing world (Forrest and Kearns 2001; Mahmoudi Farahani 2016). It has, unsurprisingly, been shown that young people who show a greater connection with the local community and the local environment show a higher tendency to stay in peripheral and rural areas (Evans 2016; Haukanes 2013; Theodori and Theodori 2015). In this way, it is possible to monitor how, in parallel with globalisation influences, local social relations influence the planning of young people's lives. Finally, in some cases, the concept of lifestyle migration can be useful for interpreting youth migration (King 2018). For example, some cities can be attractive to young people due to a developed cosmopolitan lifestyle (Emilsson and Adolfsson 2019).

Previous research on the factors influencing young people's decision to choose a foreign country as a desirable educational environment has indicated that it depends on the students' characteristics, as posited by Netz (2021: 1050):

...student personality traits, beliefs, attitudes, norms and corresponding benefit expectations, socio-demographic features, such as their gender, age, ethnicity and social origin, previous experience with spatial mobility, academic performance in school and higher education and literacy, numeracy, technical and foreign language skills.

In addition to the listed personal determinants that have been found to influence young people's intention to study abroad, the influence of various contextual factors has been additionally noted, such as the attitudes of peers and parents, institutional and economic factors (Netz 2021) and cultural aspirations (Wright, Ma and Auld 2022), as well as the attachment to local communities and local identities (Cairns and Smyth 2011). It is also considered important to study and interpret the influence of social networks (Brooks and Waters 2010; Carlson 2013), as well as the perception of the place of origin and destination, above all in the macroeconomic context, which can both limit and enable their mobility (van Mol and Timmerman 2014). Aside from place attachment, other personal values, to the best of our knowledge, have been studied only regarding the experiences and satisfaction of international students (Arambewela and Hall 2011; Grayson 2008).

When it comes to Croatia, it is noticeable that the issue of migration aspirations has attracted the most attention in recent years (Vukić, Perić Kaselj and Škiljan 2023). Given that Croatia has joined the European Union, the opportunities for the mobility of young people have also increased. Consequently, the data indicated a large number of young people who showed an interest in and desire to migrate (Vukić et al. 2023). Young people from smaller communities show greater migration aspirations, as well as those who assess the economic situation in Croatia more negatively, thus expressing the intention to emigrate to find better employment opportunities and higher salaries (Adamović and Potočnik 2022).

Although it is generally considered that student mobility has multiple beneficial effects, such as a positive impact on students' academic performance, various skills and employment prospects (Matković, Gregurović and Šabić 2023), especially for those from new member states of the European Union (di Pietro and Page 2008), the data show that young people from Croatia are less represented in international student mobility programmes and in studying abroad without financial support. Although it is observed that interest in studying abroad is on the rise and is expressed by almost a third of students (Puzić, Šabić and Odak 2020; Rimac 2021), only 3.2 per cent of young people from Croatia have experienced international mobility during their studies. While various barriers to the mobility of students from Croatia can be listed, the key motivational factors are the desire for personal development, the desire to improve a foreign language and the quality of study programmes (Puzić et al. 2020). However, for the majority of young people from Croatia, the main obstacle to studying abroad is the additional financial expense for their families (Rimac 2021).

What has been said thus far indicates that research studies have established that the intention of young people to study abroad is not the result of personal ambition alone but, rather, the result of a complex interaction between various drivers and obstacles, wherein some of these reasons are also related to the experience of the local environment. Thus, for example, for young people from Italy, the improvement of language skills by studying abroad is a strategy through which they want to improve the unfavourable situation on the labour market in their home country (van Mol and Timmerman 2014). However, in addition to the fact that previous research has established that studying abroad can subsequently result in a positive impact on various domains of their life in the home country, research findings also indicate that young people who study abroad subsequently become more involved in international migration on the labour market (Baruch, Pawan and Khatri 2007; King and Ruiz-Gelices 2003; Netz 2021; van Mol and Timmerman 2014). A study conducted in Poland showed that the temporary migrations of secondary-school

students from peripheral areas for the purpose of studying usually translate into permanent migrations, while the main factor behind migration is the mismatch between the development of the labour market in peripheral areas and the structure of the educational system, whereby peripheral areas are unable to offer young people adequate jobs (Dolińska, Jończy and Rokita-Poskart 2020). Similar findings are confirmed in studies conducted in other parts of Europe, such as Belgium and the Netherlands (Thissen, Droogleever Fortuijn, Strijker and Haartsen 2010), Iceland (Bjarnason and Thorlindsson 2006) and the post-Soviet countries (Chankseliani 2016). In these studies, employment opportunities appeared to be an important factor influencing the intention of secondary-school students from rural areas to emigrate. On the other hand, in some of these studies, a stronger attachment to the local community proved to be an important reason for staying (Bjarnason and Thorlindsson 2006; Thissen *et al.* 2010).

Methods, samples and measurements

The study comprised quantitative and qualitative sections. First, a cross-sectional survey research study was conducted in February and March 2019 of whom the target population was third- and fourth-grade students from secondary schools in VSC. A two-stage cluster sample was employed. In the first stage, all secondary schools from VSC were included in the sample. In the second stage, a proportional number of classes were chosen according to the year of study (third or fourth), city and programme type (vocational or gymnasium). Small discrepancies were corrected with poststratification weighting. Out of the total of 2,901 secondary-school students in VSC, 744 students comprised the initial sample. Afterwards, only 681 students who expressed the intention to continue their studies within the higher education system were included. The number of missing values was very low, slightly exceeding 1 per cent only in the case of 1 variable. The data were collected via a group survey during the classes, using the paper-and-pencil technique. In Table 1, the detailed sample structure is shown.

Table 1. Sample structure

Variable	N	Share (%)
<i>Gender</i>		
Male	320	46.99
Female	360	52.86
Other	1	0.15
<i>Place of living</i>		
Urban	331	44.91
Rural	335	52.63
No answer	15	2.45
<i>School type</i>		
Gymnasium	216	31.72
Vocational and technical school	465	68.28
<i>GPA</i>		
Less than 2.50	5	0.73
2.50–3.49	141	20.70
3.50–4.49	367	53.89
4.50 and over	163	23.94
No answer	5	0.73

Two questions were used to determine the migration and educational plans of young people. First, respondents were asked where they would like to spend the majority of their lives after completing their education. Six options were offered from which respondents could choose, namely to live in the current place of residence, in VSC, in another place in Croatia outside VSC, in another European Union country, in a European country outside the European Union or in a non-European country. In order to simplify the analysis and, given that almost 70 per cent of all outside migration choices were directed towards European countries, the respondents' answers were re-coded and three groups of respondents were distinguished: those who would like to spend the majority of their lives in VSC, those who would like to live in Croatia but not in VSC and those who would like to live abroad.

The preferred place of education was investigated with the question: 'If the opportunity arose, where would you like to continue your education after having finished high school?' The same 6 options were offered, which were subsequently split into 3 groups – namely, students who would like to study in VSC, those who would like to study somewhere else in Croatia and those who would like to study abroad. As already indicated, the students who did not plan to continue their education were not taken into account in the subsequent analyses.

Based on the literature review, three groups of predictor variables were used to test the differences between the different groups of students concerning their life plans. The first group was called *basic demographic characteristics* and included gender (male, female, other), school type (gymnasium or vocational school), GPA, place of living (urban or rural), life satisfaction (from 1 to 5) and the perception of the standard of living in their household compared to the Croatian average (from 1 to 5). Due to the lower frequencies (less than 5 per cent), some of the categories were merged in the subsequent analyses.

The second group, *the perception of the local community*, was operationalised through 3 dimensions that tried to capture (a) place attachment, i.e. the emotional relationship of the respondents towards the place of residence, (b) the assessment of social cohesion in the local community and (c) the perception of career development opportunities.

To measure place attachment, we used a part of the so-called Urban-Identity Scale constructed by Lalli (1992). More precisely, his general instrument of urban identity consisted of 5 dimensions and, in our research, the dimension called General Attachment was used. This dimension consisted of 4 items/statements and the degree of rated agreement ranged from 1 (completely disagree) to 5 (completely agree). In relation to the original instrument, small wording changes were made, given that some items included measurement of the connection with a specific geographic place (in our version of the scale – VSC). The items used in this study are as follows: 'I have got native feelings for my community', 'I see myself as a member of my community', 'I feel really at home at my community' and 'This community is like a part of myself'. In the current study, the value of Cronbach's α was 0.92.

The perception of local neighbourhood social cohesion is also a factor that indicates the current state of the local community – and may also indicate its development capabilities. In the case of the perception of local social cohesion, the instrument created by Sampson, Raudenbush and Earls (1997) was previously used and validated in a research study in Croatia (Miletić, Krnić and Majetić 2016). The instrument consists of 5 parts that investigate how respondents evaluate their neighbourhood in terms of solidarity, connectedness, homogeneity, harmony and trust. The following items comprised this scale: 'People around here are willing to help their neighbours', 'This is a close-knit neighbourhood', 'People in this neighbourhood can be trusted', 'People in this neighbourhood generally get along each other', and 'People in this neighbourhood share the same values'. Agreement with the offered statements was measured on a 5-point scale: from *I do not agree at all* (1) to *I completely agree* (5). In the current study, the value of Cronbach's α was 0.88.

The perception of employment opportunities and career development was measured by employing a multi-item instrument that was created for this research study. Respondents were asked to indicate the extent to which they are satisfied with the possibility of finding employment in the county, as well as with the transparency of employment, the availability of well-paid and diverse jobs and the availability of jobs that enable the advancement of more ambitious employees. The value of Cronbach's α was 0.86.

When investigating *value orientations*, as the third group of predictors, an instrument previously used in several research studies on young people in Croatia was used (Ilišin and Gvozdanović 2016; Radin 2007). The instrument contained items that describe tendencies towards various types of success, the desire for leisure and entertainment at will, the high value put on the time spent with the family, etc. Respondents expressed their desirability on a scale of 5 degrees: from *extremely undesirable* (1) to *extremely desirable* (5). A factor analysis revealed a 3-factor structure, the same structure as in a recent study that used the same instrument (Ilišin and Gvozdanović 2016). The following value orientations were thus determined: social success (comprising 4 statements with a value of Cronbach's α of 0.76), traditionalism (3 statements; Cronbach's α was 0.56) and individual autonomy (2 statements; Cronbach's α was 0.64). Somewhat lower values on the reliability test can be connected to the small number of items included in the scales (Vaske, Beaman and Sponarski 2017).

To strengthen the interpretation of the survey results, 12 interviews were conducted with randomly selected third- and fourth-grade students, until the saturation point was reached. The sample size is consistent with the conclusions of a systematic study conducted by Hennink and Kaiser (2022), who concluded that the saturation point is usually reached after between 9 and 17 interviews. The students were asked to describe their educational and migration plans and the various factors that determine them. Bearing in mind the purpose of this part of the study, we introduce the illustrative statements of the students obtained in the interviews in the discussion of the survey results in order to strengthen the interpretation of the results.

Given that the survey and interviews included minor students, informed written consent from the parents and schools and an informed verbal consent from the students were obtained before the data collection. All participants were guaranteed full anonymity and were advised that they could withdraw from the study at any time. The research study was approved by the Ethical committee of the Institute for Social Sciences Ivo Pilar (decision no. 11-73/18-2805).

Results

The results of the research showed that young people from VSC expressed high migration aspirations (see Table 2). They revealed that only 35.76 per cent of respondents would like to remain in VSC, 32.26 per cent would like to live somewhere else in Croatia and 31.17 per cent would like to live somewhere abroad. When it comes to the preferred place for continuing education, 67.18 per cent of the secondary-school students would like to study in Croatia, although outside VSC, 18.75 per cent of the students would like to study abroad, while 14.07 per cent would like to study in VSC.

We note that young people are predominantly satisfied with their lives, given that 70.78 per cent of the respondents indicated that they are satisfied or very satisfied. When it comes to self-assessment of the household standard of living, the largest number of respondents (57.84 per cent), rated their situation as approximately average compared to the rest of the people in their community.

Table 2. Descriptive results (categorical variables)

Variable	N	%
<i>Preferred place of university study</i>		
Vukovar-Srijem County	94	13.88
Croatia	458	67.65
Abroad	125	18.46
<i>Preferred place of living in the future</i>		
Vukovar-Srijem County	239	35.76
Croatia	215	32.26
Abroad	208	31.17
No answer	5	0.81
<i>Life satisfaction</i>		
Non-satisfied	62	9.32
Somewhat satisfied	124	18.58
Satisfied	357	53.50
Very satisfied	115	17.28
No answer	9	1.32
<i>Standard of living</i>		
Below average	77	11.54
Average	386	57.84
Above average	201	30.04
No response	4	0.58

When it comes to other variables measured on the quantitative (interval) scale, from Table 3 we can note that the young people in this area are very dissatisfied with the possibility of employment in the local community, given that the mean on a 5–25 scale amounted to 10.29. In all 5 investigated areas of the satisfaction with the employment in the local community, there is a greater number of young people who express dissatisfaction compared to those who are satisfied with the possibility of employment. In contrast, young people showed a relatively high place attachment. For instance, 76.7 per cent of the respondents agreed with the statement *I feel that I am home in the settlement where I live*, while 64.5 per cent agreed with the statement *The settlement where I live means a lot to me*.

Young people also expressed a slight satisfaction with the social cohesion in the neighbourhood; however, there are significant differences between the responses to specific scale items. Young people agreed to the greatest extent with the statement that people in the neighbourhood are ready to help each other (64.1 per cent of respondents agreed with this statement), while they agreed to the least extent with the statement that people in their neighbourhood share the same values (47.9 per cent of respondents agreeing with the statement).

When it comes to the answers to the items that investigated the value orientations of young people, it was shown that the most desirable life goals for young people are to *live peacefully in the family circle* (preferable for 80.5 per cent of respondents) and *to be your own boss and do what you want* (75.2 per cent). Average results for all 3 sub-scales (traditionalism, autonomy and success) are listed in Table 3.

Table 3. Descriptive results (quantitative variables)

Variable	N	Min.	Max.	Mean	Standard deviation
Employment opportunities	663	5	25	10.29	3.71
Place attachment	662	5	25	17.91	5.73
Local social cohesion	664	5	25	16.88	4.82
Traditionalism as a value	663	3	15	11.11	2.44
Autonomy as a value	661	2	10	7.47	1.90
Social success as a value	658	5	25	17.69	3.64

More about the descriptive results related to place attachment, social cohesion in the neighbourhood and value orientations of young people in this study can be found in Žanić, Miletić and Živić (2022).

As the first part of our analytical strategy, we conducted a 2-step SPSS 24 cluster analysis with 2 variables – the preferred place of living in the future (VSC, the rest of Croatia or abroad) and the preferred place of studying, with the same response categories. A 2-step cluster analysis is chosen because it can accommodate both large datasets and categorical variables (Kent, Jensen and Kongsted 2014). In the first iteration, with the maximum number of clusters allowed, 7 were extracted. However, 2 of the clusters were extremely small – i.e. they comprised only 4.6% and 3.1% of all cases, respectively. Therefore, in the second iteration, the number of extracted clusters was 5, with each of them being theoretically interpretable and comprising a significant number of cases (Table 4). The average silhouette measure of cohesion and separation amounted to 0.9, indicating a good fit to the data.

Table 4. Cluster structure

	Preferred place of future university education	Preferred place of living in the future
Cluster 1. Focus on Croatia (N=195) 29.0%	Croatia (100%)	Croatia (100%)
Cluster 2. Planned return to the VSC (N=154) 22.9%	Croatia (100%)	VSC (100%)
Cluster 3. Focus on VSC (N=117) 17.4%	VSC (74.4%)	VSC (73.5%)
Cluster 4. Gradual departure abroad (N=105) 15.6%	Croatia (100%)	Abroad (100%)
Cluster 5. Focus on abroad (N=102) 15.2%	Abroad (100%)	Abroad (100%)

As can be seen, the first cluster consists of those students who want to study in other areas of Croatia and want to continue their lives there after their studies. In the second cluster, we find students who want to finish their studies in other parts of Croatia but want to return to live in VSC. The third cluster comprises students who want to both study and continue their lives afterwards in VSC. The fourth cluster consists of students who want to finish their studies in Croatia but to continue their lives abroad. In the fifth cluster are students who want to finish their studies abroad and then live there after having finished their studies.

In the second part, we investigated the predictors of the cluster membership. Given the multilevel structural nature of the data – i.e. the fact that the students from one school might be more similar to each other compared to the students from the other schools, multilevel modeling with categorical outcomes was used as an analytical method to avoid clustering effects on sampling errors (Heck, Thomas and Tabata 2012). However, since in the empty random intercept model (with no predictors) the intercepts did not vary significantly between schools ($z=1.51$; $p=0.13$), we subsequently conducted a multinomial logistic regression analysis without multilevel structure using IBM SPSS 24. A sensitivity analysis confirmed that all substantive results obtained through this analysis were equivalent to those obtained using multilevel modelling. Additional sensitivity analysis related to post-stratification weights also showed that the substantive conclusions obtained from the analysis with and without the weights are the same.

Table 5. Multinomial logistic regression analysis with cluster membership as the criterion variable

	Cluster 1 Focus on Croatia		Cluster 2 Planned return to the VSC		Cluster 3 Focus on VSC		Cluster 4 Gradual departure abroad	
	B	Exp(B)	B	Exp(B)	B	Exp(B)	B	Exp(B)
Gender (ref.=male)	0.52	1.68	-0.24	0.79	-0.26	0.77	0.03	1.03
School type (ref.=vocational school)	0.04	1.04	0.32	1.38	0.06	1.06	0.63	1.88
GPA (ref.=4.50 and over)								
Less than 3.50	-1.03*	0.36	-1.41**	0.25	-0.34	0.71	-1.11*	0.33
3.50–4.49	-0.51	0.60	-0.09	0.92	0.30	1.35	-0.23	0.80
Place of living (ref.=urban)	-0.23	0.79	-0.29	0.75	-0.02	0.99	-0.06	0.94
Life satisfaction (ref.=very satisfied)								
Non-satisfied	-0.48	0.62	-0.45	0.64	0.56	1.75	-1.12	0.88
Somewhat satisfied	-0.65	0.52	0.20	1.22	0.02	1.02	-0.25	0.78
Satisfied	0.11	1.11	-0.09	0.91	0.26	1.30	-0.13	0.88
Standard of living (ref.=above average)								
Below average	-0.64	0.53	-0.68	0.51	-0.30	0.74	0.28	1.32
Average	0.07	1.07	0.00	1.00	0.15	1.16	-0.22	0.81
Employment opportunities	0.09*	1.10	0.14**	1.15	0.09*	1.10	0.01	1.01
Place attachment	0.06*	1.06	0.24**	1.27	0.18**	1.20	0.00	1.00
Local social cohesion	0.02	1.02	-0.01	0.99	-0.02	0.98	0.02	1.02
Traditionalism	0.09	1.10	0.17*	1.19	0.11	1.11	-0.03	0.97
Autonomy	-0.13	0.88	-0.27**	0.76	-0.20*	0.82	-0.13	0.88
Social success	0.01	1.01	-0.03	0.97	-0.03	0.97	0.02	1.02

Reference category = those who plan to study and live abroad. Chi-square = 249.17, $p < 0.00$; Cox and Snell = 0.34; Nagelkerke = 0.35; McFadden = 0.13; * $p < 0.01$ ** $p < 0.05$

The results of the analysis are shown in Table 5, where the reference category was a cluster of students who were focused on moving abroad, which means that they want to go and study abroad and then stay there to live. Note, too, that all 3 clusters of students who plan to live in Croatia (either in VSC or in other parts of the country), after controlling for other predictors, express a higher degree of belief in the possibility of finding satisfactory employment in VSC, with an odds ratio amounting to 1.10 in the case of the first and third clusters and 1.15 for the second cluster. Likewise, the members of these 3 clusters expressed a higher level of place attachment (odds ratios are 1.06, 1.27 and 1.20). In comparison to the students who want to study and live abroad, higher traditionalism can be detected only among the students who want to return to VSC after having completed their studies (odds ratio equals 1.19), while a lower preference for personal autonomy can be observed among both groups of students who prefer to stay in VSC (odds ratios are 0.76 and 0.82). The perception of local social cohesion and social success as the value preference were not statistically significant predictors. When it comes to basic demographic characteristics, gender, school type, place of living, life satisfaction and the perceived standard of living were not statistically significant predictors. On the other hand, the students with a GPA lower than 3.50 were less likely to belong to all 3 clusters of students who expressed a preference to continue university education in Croatia (odds ratios between 0.25 and 0.36).

Discussion

We believe that the current study contributes to the scholarship by connecting the two topics that have been insufficiently clearly integrated – namely, educational aspirations and long-term migration choices. Several research studies thus far have dealt with generally defined migration aspirations, with some of the studies focused on studying abroad while, in others, education was cited as only one of the motives for migrating (van Mol 2016). The analysis carried out here connected the educational choices of the young people related to the different geographical areas (local, national and international), with their preferred life paths after completing their education. Cluster analysis identified 5 groups of young people who combine their educational choices and migration plans in different ways. Overall, the determinants related to the perception of the local community, with the exception of local social cohesion; personal value orientations proved to be more important than basic demographic characteristics when predicting cluster membership.

The results of the study point to the conclusion that place attachment significantly influences young people's plans for the future. Young people oriented towards going abroad show a significantly lower level of attachment to the local community than those who imagine their future there. Such orientations might be rational, since homesickness can contribute to the accumulation of stress and even international students usually face several challenges and barriers in their attempts to adjust to the new social and cultural environment (Bilecen, Diekmann and Faist 2023; Diehl, Jansen, Ishchanova and Hilger-Kolb 2018; Poyrazli and Grahame 2007; Tavakoli, Lumley, Hijazi, Slavin-Spenney and Parris 2009). On the other hand, personal autonomy can be strengthened when studying abroad, given that international students achieve an increased sense of mastery, personal growth and accomplishment when adjusting to new environments (Prazeres 2017; Terrazas-Carrillo, Hong and Pace 2014; Terrazas-Carrillo, Hong, McWhirter, Robbins and Pace 2017).

Students' life plans are also linked to the evaluation of the developmental possibilities offered by the local community and its overall quality of life. A lack of local opportunities for career development in the future significantly affects the desire to live abroad. Several interviewed students confirmed the crucial importance of career opportunities for migration intentions.

The first thing for me is the security of employment, that I actually find some kind of job right after college; after that, it's the same financially, whether the salary is good. It doesn't have to be a spectacular salary but to cover all needs and to be able to live a normal life in addition to that, so that I don't have to look at actually making ends meet, that's the only thing (Participant 4, female).

Well, they would have to open, like, some factories or something that would create jobs for people and whether they would get the opportunity to be employed there at all because that's why young people move, they don't have work and money. Small salaries and so... (Participant 5, female).

Naturally, this is not a surprising finding since the large number of young people from Croatia cited the improvement in living standards, better employment opportunities and higher wages as the key reasons for wanting to migrate (Adamović and Potočnik 2022). However, apart from the weak opportunities for career development, two other shortcomings of this region have a negative impact on the willingness of young people to stay in the community. First of all, young people stated that there are not enough opportunities in the county for them to continue their education after finishing high school – the current opportunities are the local polytechnic and several study programmes offered by universities and polytechnics from other parts of Croatia, which can be attended locally. This probably leads to the negative migration balance of VSC within Croatia.

First of all, this is a very small community, so some institutions are missing in the beginning. For example, higher education is also the main cause of leaving (Participant 3, male).

There are no jobs and almost no colleges, so everyone either goes to work after high school – which means they go somewhere else because there is nothing to do here and if they do go to college, they also go to college elsewhere because there are almost none here (Participant 7, male).

Well, I would primarily leave because of my choice of college. We have a polytechnic here and anyone can go to Osijek or Zagreb or Zadar or anywhere and I think that, if someone finished college there, he/she would stay in that city (Participant 1, female).

On the other hand, the differences between the detected clusters suggest that the desire to study abroad largely represents an attempt to escape from the peripheral environment, which is motivated primarily by the desire for autonomy but also by a more negative assessment of the region's economic perspective and employment opportunities, as well as a low attachment to the local environment. It should be noted here that it is more about an imaginary than a real escape attempt, bearing in mind the very low proportion of Croatian high-school students who study abroad – i.e. the gap between the desire to study abroad and the realisation of such a desire (Matković *et al.* 2023). The marked absence of a large cluster of students who would like to study abroad and return to Croatia shows that studying abroad as a mechanism for avoiding downward social mobility probably does not exist as a significant mechanism in such a peripheral area. The question that arises is whether this mechanism of family-inherited cultural and financial privileges, which was detected in earlier research in Croatia (Puzić *et al.* 2020), is possibly present to a greater extent in larger and more developed cities with more well-to-do young people than in peripheral areas. It is also very important to point out here that the cluster of students who want to study abroad and stay there and those who want to study in Croatia and then go abroad differ only in that the latter case comprises more successful secondary-school students. This finding also

probably implies an element of escapism and imagination, bearing in mind that students who want to study abroad do not want to do so because of the better quality of foreign higher education institutions but because they have not achieved success in the Croatian education system. The fact that better students chose to study in other parts of Croatia and not in VSC or abroad, also points to the conclusion that the lack of local higher education programmes contributed to the negative migration balance of VSC within Croatia – i.e., the reasons for moving abroad probably cannot be found there.

In addition, it is pointed out that certain facilities are lacking, especially entertainment spaces for young people.

No, there is not enough entertainment content for young people. Starting, for example, with clubs, disco clubs and perhaps sports clubs (Participant 3, male).

I think that we have enough physical spaces but these spaces are mostly either closed or not working, so there's not much fun there (Participant 6, male).

It would be great, for example, if there was a special room that would be, say, for us young people. Let's say, something like a youth association, something like that. And now we come up with an idea to come up with something, no matter what, any activity. That would be great. Or that we have some kind of space to hang out in the winter, because in the summer we're all outside anyway (Participant 11, female).

It is interesting that the perception of social cohesion in the neighbourhood was not a significant predictor of future life plans, which points to its declining importance for young people, even in relatively traditional areas such as VSC. This should be explored in more depth in future research – an excerpt from one interview hints at such a possibility.

It's a completely different story now, everyone lives for themselves, so no one is interested in other people's business and that's even more okay with me because there's no special interaction except 'Good day' but everything is more okay like this for me (Participant 4, female).

A significant finding from the current study is that the value orientations of secondary-school students are important for their desire to study abroad, which has not been previously researched. Namely, young people who are focused on studying and living abroad show a greater preference for personal autonomy, while young people who expressed an intention to return to their community expressed a stronger inclination toward traditionalist value orientation. Below are two statements; one illustrates a young person with a traditional value orientation and the second briefly describes someone who wants to leave a local community that seems limiting to her.

I am not planning to leave, I was born here, it's my homeland, I want to stay here. If everyone leaves, who will remain among us and how can we expect any progress, when we were the first to pick up and leave... I try to follow my religious faith in everything I do and that's it. I mean, I'm active in the parish and I go to church, so that's an important factor in my life (Participant 2, female).

I know one girl who said she wouldn't want to go back and that's totally fine with me. She is a person whom I can't even imagine living in this community because she's all so different; to me, she is like 'worldly' (Participant 4, female).

Peripheral areas are often marked with a more traditional way of life and the more traditional young people from a peripheral area covered in this study acknowledge this when making their life plans. Peripheral areas without the dynamism and multicultural environment of the large international urban centres do not represent stimulating environments for young people with such value orientations. In other words, peripheral areas are characterised by 'the low social density of events', which results in 'a relatively low level of total social energy' (Lay 1998: 15).

The differences in value orientations can be linked to research on lifestyles and suggest that future research on imagining the future should include this concept more significantly (Benson and Osbaldiston 2016). The concept of lifestyle migration can be particularly useful if it is taken into account in a somewhat broader sense compared to its initial use. In other words, it was primarily used to detect privileged migrations in which well-to-do individuals use their cultural and financial capital to move easily in the globalised world (McGarrigle 2022). At the same time, the focus was on migrations from the centre to the peripheries that offered certain benefits. However, there have been suggestions to expand this concept to include migration in the reverse direction, from peripheral areas to vibrant cities (King 2018). Precisely in this sense, we think that it can be fruitful to connect value aspirations and lifestyles with the migration of young people.

Conclusions, limitations and policy implications

In the modern process of growing up, young people plan their life paths to a large extent by combining local, national and global frames of reference. Research thus far has shown that young people from peripheral areas are in a complex situation, with a significant number of them expressing an 'escape narrative', meaning that, without completing higher education, they are unable to realise desirable professional careers. The analysis conducted in this paper offered some important insights and policy implications.

It was shown that the perception of developmental opportunities in the county, place attachment and value orientations influence the way in which young people imagine their preferred life paths. Imagining the future is thus influenced in different ways by a combination of the respondents' identity and their perception of certain shortcomings that are present in the local community. Therefore, policies aimed at young people in VSC should focus on solving the following three problems: facilitating the career development of young people, improving higher education possibilities and shaping new leisure time content for young people, especially places where young people can gather and socialise. Taking into account that migration aspirations are particularly prominent among students in the final grades of secondary school, the development of higher education study programmes can be considered a priority element of the local and state policy related to this area. We can assume that the establishment of such institutions and programmes would also facilitate the creation of different types of cultural and entertainment spaces for young people. Therefore, deprived and peripheral areas, such as VSC, might benefit from the more diverse higher education opportunities which, according to our study, would contribute towards the reduction of regional migration imbalances.

When it comes to the limitations of this research, it should first be noted that, although most of the measurement instruments used in the study have been used previously and have proven metric

characteristics, the reliability of some instruments with a smaller number of items was below the usual threshold of acceptability. Second, the analysis is limited to the local community level; future research in this area should therefore include a regional dimension to the analysis – that is, to explore possible differences between those young people who want to realise their educational and migration aspirations by going to a regional centre (in our case, Osijek) and those who want to go to other parts of Croatia or abroad. Finally, our analysis did not cover in full detail the socio-economic background of the students and its possible influence on migration and educational aspirations, especially when it comes to potential interaction effects.

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Conflict of interest statement

No conflict of interest was reported by the authors.

Data availability

The data to support the study results are available at the data repository of the Faculty of Humanities and Social Sciences, Josip Juraj Strossmayer University of Osijek: <https://repozitorij.ffos.hr/islandora/object/ffos:6691> (urn:nbn:hr:142:535670).

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The Migration of Medical Graduates from Romania to EU Countries – Regulations as a Pull Factor

Marilena Nicula*

This article explicitly examines the migration of medical graduates from Romania, ensuring clarity in scope. The study draws on the 2023 European Commission State of Health in the EU: Romania Country Profile, ensuring the use of the most recent data. While the number of graduates has increased in the last decade, the medical workforce remains below EU averages (3.2 doctors and 7.5 nurses per 1,000 inhabitants compared to 3.9 and 8.4, respectively). Romania ranked fifth in generating medical graduates (4,967) and third in nursing graduates (17,549) within the EU in 2019. However, migration significantly reduces the domestic healthcare workforce, influencing access to care and quality of life. My analysis thus uniquely explores the role of regulatory frameworks in shaping migration flows, offering a novel perspective on how policies in destination countries act as pull factors. My findings reveal that countries with deregulated or minimally selective residency admission systems attract significantly higher numbers of Romanian medical graduates. Among the most preferred destinations, Germany, the UK, France, Sweden and Belgium collectively account for over 70 per cent of intended migration cases. Residency systems without national exams saw an average migration preference rate of 69 per cent, while those with strict entry requirements saw a preference rate below 1 per cent. Higher expected wages and shorter residency durations were also significant pull factors. Another significant pull factor identified in the top destination countries is that graduates have the freedom to choose their specialization, rather than having it assigned based on exam performance.

Keywords: medical professional migration, brain drain, medical education, healthcare, Romania, European Union

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Introduction

Existing regulations shape the context of and influence the decision to stay or to leave the country. Both destination- and origin-country legislation plays a pivotal role in shaping migration flows; my paper investigates the migration of Romanian medical graduates. In it, I investigate the migration of Romanian medical graduates by examining how regulations in both Romania and other EU countries influence their decisions. Unlike previous studies focusing on general economic factors, my study uniquely highlights the regulatory dimension of the migration of medical graduates. To test my hypothesis, I analyse Romanian legislation over time and examine its correlation with annual emigration trends, providing a historical perspective on regulatory influences. I further investigate the medical residency requirements across 27 EU countries, the UK and EFTA nations, contrasting them with changes in migration patterns. This approach enables me to assess the extent to which different regulatory models impact on the decision of Romanian medical graduates to emigrate. The same applies to the institutional system in the EU countries. For instance, when Romanian regulations become harsher, one may expect increasing outmigration flows. When regulations in a certain destination country become attractive for immigrants from other EU countries, we expect an increase in the size of the flow of Romanian doctors migrating to that country. Therefore, my study connects regulatory changes in both destination and origin countries to the annual fluctuations in migration flows from Romania to various EU nations. In researching the migration of medical graduates from Romania it is useful to inspect such connections between legislative changes, since Eurostat 2020 data show that Romania leads the European chart in medical graduates with a rate of 26.3 per 100,000 inhabitants, highly surpassing the EU average of 15.9. In addition, there is a chronic 'special deficit' of medical professionals, affecting healthcare in various regions (Eurostat 2020).

My specific research question in this paper is: 'How do residency regulations in destination countries influence the migration decisions of medical graduates from Romania?' The methodological approach first involves analyzing Romanian legislation over time and examining the dynamics of emigration, subsequently correlating the 2 variables. Second, I analyze the requirements for medical residency in all 27 EU countries, the UK and EFTA countries; the results are then compared to the changes in the flow of new Romanian medical graduates included on the respective countries' medical registers over time.

In a world of fluid migration, this paper addresses the issue of the outmigration of a specific group of professionals – medical graduates. While earlier literature (Deliu, Fărcășanu, Mihail, Mustața, Vișinescu and Voicu 2022) stressed the various individual-level 'push and pull factors' (Lee 1966), this study stands out by examining the specific pull factors related to the regulation of the medical residency systems in destination countries. This approach considers one major source country for outgoing medical professionals – Romania – and looks to the potential associations of migration intentions of medical students with the regulations in the European destinations for their mobility.

Romania becomes an ideal setting to study what attracts future medical specialists to move abroad. As mentioned above, my main research focus is on how the different healthcare systems influence migration decisions. Keeping the analysis focused on Europe, the proposed explanation builds upon push–pull theory and stresses the role of regulations. More-flexible arrangements for residency, less-restrictive admissions criteria, higher expected salaries and reduced competition are hypothesized as contextual variables to depict the role of host-country regulations in attracting graduates from abroad. More specifically, while the first-mentioned factors refer to aspects of regulation that can be adjusted to attract foreign graduates, the latter serves as a structural determinant of post-residency opportunities. To test which factors could be salient in attracting future medical specialists, I compiled a dataset on European health systems, conducted bivariate

analyses of migration intentions and, finally, ran several multivariate models. Such an approach is quite new in the field and provides original data with which to compare residency systems across Europe.

In the following sections, I first present the conceptual rationale for selecting the main pull factors, then discuss the findings and conclude with policy implications.

Theoretical background

The principles of the classic push–pull theory are valuable as a starting point. In 1966, Everett S. Lee's theory of migration emerged, positing that migration decisions stem from a complex interplay of factors categorised into four domains: characteristics of the origin location, attributes of the destination area, intervening obstacles hindering movement and the individual considerations of potential migrants. The theory was repeatedly refined but remains valid in its basic provision (Czaika and Reinprecht 2022; Faridi 2018; Moullan 2018).

As in any high-skilled migration, when considering that of medical staff, the push and pull factors are likely to be diverse (Mayda 2010; Păunică, Cosmina and Ștefănescu 2017; Voicu and Croitoru 2023). The migration of physicians from Romania is reported to be shaped by a combination of push and pull factors (Lee 1966) and, as argued for high-skilled migration, the push factors are likely to play a minor part (Mayda 2010).

Focusing on pull factors, the typical drivers for physicians – as stressed by the existing literature – include the lower unemployment rate (Urbański 2022), good remuneration (Becker and Teney 2020; Botezat and Ramos 2020; Kline 2003), a good medical infrastructure that enables professional development and higher prestige (Becker and Teney 2020), a demand for the medical profession, as seen in terms of an aging population (Botezat and Ramos 2020) or in a lower density of supply of medical service in terms of a low density of doctors (Moullan 2018) and health spending (Moullan 2018; Yakovlev and Steinkopf 2014); however, there is no consensus on the direction of the relationship. From there, I specifically identify the pull factors associated with the institutional framework, as previously discussed. A strong institutional framework is claimed to be among the most influential of pull factors for people in wealthier countries (Aziz, Chowdhury and Cooray 2022). However, the lower-level institutional framework referring to the medical profession is rarely considered when assessing the immigration of health professionals, despite being shown to differ quite considerably across countries even when these latter are in the same area. Cudalb and Greisser (2020) provide one of the few such assessments and compare the requirements for entering the profession after graduation in Poland, Romania and Germany, the former two being a source of doctors' migration for the latter.

Focusing on the level of Central and Eastern Europe (CEE), previous research by Botezat and Ramos (2020) notes that a lower unemployment rate, a demand for healthcare services and better medical technology in the receiving country are the main drivers for CEE doctors to migrate abroad. Gruber, Sarajlic and Vukovic *et al.* (2020) add a better quality of life to the list.

Moving on to medical students, it is evident that their intentions to migrate are high across all of Central and Eastern Europe (Boncea and Voicu 2019; Goštautaitė, Bučiūnienė and Milašauskienė *et al.* 2018; Janulyte, Puriene and Petrauskiene *et al.* 2011; Kolčić, Čikeš and Boban *et al.* (2014); Krajewski-Siuda, Szromek and Romaniuk *et al.* 2012; Milić, Vuksan-Ćusa and Jakab *et al.* 2023). In addition to earlier research, more-recent studies provide evidence that Romanian physicians' migration is shaped not only by economic incentives but also by institutional and regulatory dimensions. For example, Apostu, Dinu and Marinescu (2022) show how language proficiency and local professional requirements directly affect migration choices. Similarly, Zapata, Blidaru and Rafila *et al.* (2025) stress the importance

of policy frameworks in mitigating health workforce migration from Romania, highlighting lessons relevant for European policymakers.

The migration of medical graduates from Romania is likely to be shaped by a combination of push and pull elements, out of which I particularly highlight the ones related to institutional frameworks, as previously argued. In this respect, I consider the system of residency as potentially rendering the country of destination more or less attractive. Within this system, one may ask which are the requirements at entry, which are the costs in terms of time spent on training and which are the potential benefits, in terms of expected wages, as set out below.

- *The national residency exam* can act as an entry barrier. It is very challenging and there are not enough positions advertised to be filled by those who have passed the exam; it should thus act as a factor to repel potential immigrants. If slightly easier, it could facilitate access for newcomers.
- *Economic factors*. Romanian medical graduates may be driven to migrate due to higher wages and more career-advancement opportunities in other countries, compared to Romania. *Pull factors* that attract medical Romanian graduates to emigrate may include:
 - The absence of a national residency examination.
 - Higher wages and better career opportunities: other countries offer higher salaries and better career prospects for physicians and this can be a significant pull factor for medical graduates who are seeking professional growth and better financial stability.
 - Recognition and professional development: having access to advanced medical technology and equipment, research opportunities and professional recognition can be strong pull factors for medical graduates seeking to enhance their skills and expertise.
 - Quality of life: better healthcare services for themselves and their families, better education systems for their children and improved living conditions could weigh a lot in a future medical specialist's decision to emigrate from Romania.

Motivations for emigration are multifaceted, leading to the formation of distinct migration patterns. Glinos and Buchan (2014) contribute a typology of health migrants, encompassing individuals seeking improved livelihoods, career-oriented migrants, 'traveller migrants' who view migration as a travel opportunity alongside work, 'commuter migrants' and those engaging in irregular care work abroad (e.g., temporary migration for eldercare, childcare or care of the sick).

Suciu, Popescu, Ciumăgeanu and Buzoianu's (2017) research on Romanian physicians records the 'roots' of the migration of medical professionals. The authors of the paper examine the emigration intentions of 957 graduates of the 'Iuliu Hațieganu' Faculty of Medicine in Cluj Napoca between 2013 and 2015. Their study's findings are not at all encouraging for the Romanian health system because, in their study, 84.7 per cent of graduates planned on seeking employment abroad after graduation and, of this shocking number, nearly half – 44.5 per cent – have enrolled in language classes and 26.5 per cent have already applied online for jobs.

Higher incomes, better living and working conditions, career opportunities, the 'shortage of residency' in the selected specialty and dissatisfaction with the Romanian healthcare system are some of the reasons why medical graduates emigrate. I therefore conclude that, when national decisions are made about the future of the health system, all factors in favour of a potential migration must be taken into consideration. A stable wage is undoubtedly the primary driving force behind emigration decisions, although non-salary-related aspects can restrict/reduce migration (Vujicic, Zurn and Diallo *et al.* 2004).

The Romanian situation

The situation is far from being new. For several years, Romania has been facing a severe crisis of human resources in health. Low incomes, poor working conditions, a lack of equipment and limited opportunities for professional development are just some of the factors that have led, over time, to this crisis.

According to official data from the Ministry of Health,¹ the number of physicians who held a licence to practice medicine in Romania was 48,461 in 2018, 49,267 in 2019, 50,287 in 2020, 53,414 in 2021 and 54,683 in 2022. During the period 2016–2022, 7,839 Certificates of Good Standing were issued, while 4,398 medical-school graduates did not sign up for a residency programme in Romania. The Certificate of Good Standing is issued by the Romanian College of Physicians and is mandatory for any medical graduate or physician who wants to work abroad. Far from being an absolute indicator – as it strictly highlights the intention of doctors to practice abroad and not their actual move to another system – the figures from the Romanian College of Physicians are the most relevant benchmark. Even the Ministry of Health does not have exact statistics on the number of those who have left thus far.

The Romanian authorities lack information regarding both the destination countries chosen by graduates from Romanian medical faculties, the precise motivations prompting them to pursue their specialisation abroad, the factors that attract them to those particular countries and the deficiencies perceived in the Romanian healthcare system. However, the massive wave of departures from the system, which started with Romania's entry into the European Union in 2007, generated losses of hundreds of millions of euros. We are referring here mainly to the state's expenses for the schooling and specialisation of physicians. In the medium and long term, the exodus has resulted in shortages in certain medical specialties, a decline in the quality of healthcare services and long waiting times for patients seeking specialist consultations.

The implications for healthcare policy include the development and implementation of strategies to prioritise access, affordability and quality of healthcare services in order to meet the evolving needs of the population. These strategies may involve addressing healthcare disparities, promoting preventative care and supporting medical innovation and research. Healthcare employers must also adapt to changes in service delivery – such as telemedicine and remote consultations – and must invest in technologies that improve patient care. Additionally, recruitment and retention strategies must be strengthened in order to address potential workforce shortages and ensure a skilled healthcare workforce. Migration policies should also consider the demand for healthcare professionals in different regions and countries, balancing international labour mobility with national healthcare system sustainability.

Methodology

To test my hypotheses, I use a *combination of quantitative and qualitative data sources*, which combines information from a survey of medical students who were asked about their migration intentions, along with country-level information for all potential European destinations. Therefore, the empirical approach was based on three major sources:

1. Medical students *from 6 major Romanian medical universities* were surveyed in 2016 (N=1,117). The universities were: Iași, Bucharest, Cluj-Napoca, Târgu-Mureș, Craiova and Sibiu.
2. *Regulatory information on medical residency* was collected from official government portals and national medical boards and, when missing, was completed by directly approaching via email the relevant clerk in the corresponding countries.

3. *Eurostat healthcare workforce statistics* (OECD, European Observatory on Health Systems and Policies 2021, 2023) provide additional information.

Each data source has been carefully assessed for relevance and comparability over time. Regression models, including OLS and Tobit models, were carried out at country level, to analyse the relationships between regulatory frameworks and migration trends. More precisely, I set up a database at country level. The dependent variable is the percentage of students intending to migrate to the respective country. The respective indicator is derived from the above-mentioned survey at Romanian universities.

Unfortunately, currently, there is no centralised source of national records of the state medical staff in Romania, and the data on the existing human resources in the state medical system are, in one form or another, under the management of several institutions (Ministry of Health, Romanian College of Physicians, National Institute of Statistics, public health units, National Health Insurance House, National Center for Informatics and Statistics in Public Health, ministries with their own networks, private health units, etc.).

Therefore, as the dependent variable, I use the intentions to migrate expressed by medical students. To compute them I use a survey carried out in 2016 in 6 out of the 9 universities that were awarding degrees in medical studies in Romania (Iași, Bucharest, Cluj, Sibiu, Târgu Mureș and Craiova). The results are reported in Boncea and Voicu (2019) and show the percentage of students who intended to emigrate to various European countries out of the total sample (N=1,117).

Respondents were asked whether they intend to emigrate or not. The answer choices were: 'Yes, I would like to and I have started preparing to leave', 'Yes, I would like to but I have no definite plans yet', 'No, never' and 'I do not know, I have not decided yet'. Those in the first 2 categories were asked to indicate their potential destinations. The higher percentages are observed for Germany (53 per cent out of the sample), France (35 per cent), the UK (46 per cent), Sweden (26 per cent), Portugal (37 per cent), Spain (17 per cent) and Belgium (17 per cent). For 12 countries (Croatia, Cyprus, Czech Republic, Estonia, Greece, Iceland, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta and Slovenia), there was no one in the sample who indicated them as a potential target. These percentages constitute the dependent variable. To avoid attributing different effects due to sample size, 2 different scenarios will be used in my analysis. First, the analysis includes all the places where the countries and those for which no one opted are indicated with a 0 percentage (Croatia, Cyprus, Czech Republic, Estonia, Greece, Iceland, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta and Slovenia). Second, the analysis is restrained for the countries to which at least one student indicated intentions to migrate.

Nevertheless, intentions to migrate do not always convert into actions. However, they provide a good indicator of the attractiveness of the potential destination (Lee 1966). Looking at intentions allows us to order countries according to their attractiveness – as with my intention to inspect the pull factors. Following the considerations in the previous sections, several independent variables were considered. They depict each health system and specifically refer to the density of inhabitants per physicians, the duration of training between graduating medical school and starting residency, the requirements in order to be accepted for residency, the imperative of undergoing a residency exam, the moment at which the decision on specialisation is taken, the duration of residency years, the required level of language proficiency and the salary as resident. Each of these variables may act as pull factors.

The variables used for the residency regulatory framework were derived through a content analysis of the national regulations governing medical residency programmes, supplemented by data obtained from representatives of the relevant institutions in each country (including Ministries of Health, Ministries of Education and national medical boards or equivalent organisations). A systematic research process was employed for each country, followed by direct outreach to official representatives via email.

While some provided direct responses, others offered guidance or did not respond. Whenever feasible, data triangulation was applied to enhance reliability and ensure cross-country comparability. Given the number of countries analysed and the space limitations within this paper, further methodological details and specific country-level findings are available upon request from the author.

The data on *physician density*, which come from Eurostat, show the number of people per physician in each country. This number varies across Europe, ranging from 137.68 in Italy to 323.28 in Romania. For the remaining pull factors, I performed a search of existing resources on the Internet, combined with personal consultations with country-level experts.

The *duration of required training* between graduating and starting residency is provided in months and varies from 0 (in several countries) to 24 months (Hungary, Malta, the UK).

The *requirements to be accepted for residency* were coded as a categorical variable and are also ordinal, indicating the specific type or nature of the examination in question. Consequently, I identified 3 types of examination for admission to a medical residency programme for each country analysed:

- *deregulated* (meaning that there is no national test for admission to medical residency and the selection of 'future medical specialists is made locally and by medical discipline depending on internship vacancies (or equivalent) in hospitals' (Hardy-Dubernet 2008: 336);
- *mild examination* (for instance, the exam can have 2 parts – written and oral – and the residency student can apply twice a year; alternatively, there is an exam where the candidates must expand on 2 topics from a given list); and
- *hard examination* (medical graduates sit for a major national examination, after which they can choose their area of specialisation – this examination can usually test any aspect of medicine).

The *imperative of undergoing a residency exam variable* is also categorical and refers to the presence (yes) or absence (no) of an entrance examination for admission to the medical residency programme. Another variable refers to when the *decision on specialisation* is taken and here there are also 3 categories:

- after 'graduation' (in light of the results obtained in the national residency examination);
- when choosing a 'residency' programme (depending on internship vacancies or the equivalent in hospitals); or
- a 'mixed' system (the applicants must choose a principal training-base for their specialisation programme but can rearrange the training cycles within a year and through their residency programme).

The *duration of residency years* represents a numerical variable that spans from 2 years (geriatric in Belgium) to 8 years (surgery in Ireland and the United Kingdom). The *required level of language proficiency* is a variable that falls within the categories B1, B2 and C1. In my dataset, no destination country required only basic levels such as A1 or A2. However, since only 2 countries ask for B1 level, they were merged into a common category B1/B2 and the variable was added to the analysis as a dummy. The *salary as a resident* is the final continuous variable that enables me to observe the minimum, gross annual salary in Euros for first-year resident doctors, which can vary from 20,000 Euros in Greece, Lithuania and Poland to 80,000 Euros in Switzerland.

My first analysis is bivariate, contrasting the 8 independent variables with the 1 dependent variable. Finally, OLS models were set up, to understand which effects remain important when controlling for the other confounders. Among the variables, those referring to population size, the density of physicians, the demand from the population (inhabitants per physician) and migration intentions were skewed and logarithmic transformations were applied.

Given that the dependent variable is the percentage of students in medical schools who intend to migrate to each European country, it is continuous but censored above and below (it takes values between 0 and 100). A Tobit model was run and the results were similar to those resulting from OLS estimations. For simplicity, I have opted to reveal here only the results from the OLS models (which are easier to interpret).

For the low number of cases for which full information is available (see Table 1), 2 strategies are employed. First, a set of models including only continuous predictors is run, with the aim of retaining, for subsequent models, only the most influential predictors. In these first models, the predictors include the indicators mentioned in Table 1 as control variables (population size, density of physicians), wages during residency (at start and end) and the duration of residency (minimal or maximal). After selecting the most suitable predictors, several sets of models added the remaining factors related to the institutional framework: the harshness of entry requirements, conditions for language proficiency, length of training between graduation and residency and time before the decision upon specialisation is made.

Table 1. Table of descriptives for variables in the models (country level)

Type	Variable	Specifications	N	Mean/%	SD	Min	Max
Dependent variables	Migration intentions: % of medical students' intention to migrate to the respective country	Full sample	31	7.48	14.12	0.0	53.7
		Only those >0	19	12.6	16.59	0.19	53.7
Independent variable: institutional framework (residency)	Duration of residency in years	Minimum	31	3.75	0.95	2.0	5.0
		Maximum	31	5.72	1.08	2.0	8.0
	Test for admission to residency	Deregulated	21	66.0			
		Mild examination	8	25.0			
		Hard examination	3	9.0			
	Decision upon specialisation	Graduation	9	27.0			
		During residency	8	25.0			
		Mixed	15	48.0			
	Proficiency level	B1	2				
		B2	12	2.5	0.62	1.0	3.0
		C1	18				
Independent variable: wages	Start wage as resident (minimum, gross, thousands of Euros per year)		31	41.71	20.66	0.02	80.0
	Last year's residency (maximum, gross, thousands of Euros per year)		25	58.31	29.48	0.03	116.0
Control variables	Population size (in millions)		31	16.59	23.01	0.04	84.36
	Inhabitants/physicians (in thousands)		21	0.19	0.05	0.12	0.32
	GPs per 100,000 inhabitants, 2021		27	105.57	54.85	46.81	298.18

The second analytical strategy referring to OLS models considers the robustness of the findings. Since the number of countries that attract no one is quite high, the models were also run for a subsample that

includes only the destinations that attracted at least 1 student. The findings were virtually unchanged, confirming their stability.

Findings: Bivariate analysis

When contrasting the migration intentions of medical students from Romania with the admission requirements for medical residency in the analysed countries, we observe that the top countries in order of preference are Germany, the United Kingdom, France, Sweden and Belgium. Except for France, none of them has a national residency exam and medical residents can select or change their speciality during residency. Some 69 per cent of students prefer destinations without a national residency exam, while 31 per cent favour countries with stricter admissions criteria. Additionally, the average percentage of students intending to migrate to countries with a less-rigorous examination stands at less than 1.

Regarding the required language proficiency level among the top destinations, Belgium and France require B2, while the other 3 countries ask for C1. Considering all 32 countries in our sample, those asking for B1 tend to show an average attraction for 6 per cent of the students, while B2 = 38 per cent and C1 = 56 per cent.

First-year resident salaries vary across the 5 countries: Belgium (€38,557–€69,280, average €55,557), Germany and France (around €60,000), the UK (around €67,000) and Sweden (around €70,000). By comparison, the minimum gross annual salary as a medical resident in Romania is 23,496 Euros.

Findings: Multivariate analysis

The initial models, with only continuous predictors, indicate that starting wages and ending wages cannot coexist due to collinearity. Norway acts as a significant outlier, influencing the relationship shape concerning duration. Both density (GPs per inhabitant) and demand (inhabitants per physician) are found to be non-significant.

Decisions were made to run models without Norway and to use density, which includes fewer missing values. Minimal duration of residency proves to have no effect but maximal duration has a low negative effect in these models, meaning that a longer period for residency deters migration intentions (see *tst01a*, *tr11a*, *p01a* and *s01a* in Table 2). The decision is to keep this maximal duration in subsequent models.

Table 2 summarises the results for the analyses run on the entire sample. A core set of predictors was kept unchanged, tapping for structural conditions (population size), potential market (density), expected financial benefits (wages) and the salient indicator for the institutional framework of residency – its duration. Then, in each model, another factor related to the institutional model was added. As noted, the low number of cases does not allow the addition of more than one factor in each model.

The duration of residency remains significant in almost all models (see *tst01a*, *tr11a*, *p01a* and *s01a* in Table 2), showing its stable effect. Students are less attracted by health training systems where residency takes longer.

However, the other residency-related factors do not matter when controlling for the core predictors. The type of admission maintains the differences between categories with the sample (see *tst01a* and *tst02a* in Table 2), meaning that students display higher migration intentions towards countries where the examination is absent or loosely regulated and prefer, to a lesser extent, countries where a tougher exam is in place.

Table 2. Results from regression models: all countries, irrespective of student migration intentions

	Model name:	tst01a	tst02a	tr11a	tr12a	p01a	p02a	s01a	s02a
Institutional framework	Type of admission: Deregulated	0.00	0.00						
	Type of admission: Mild.examination	-0.75	-1.13						
	Type of admission: Hard.examination	-0.26	-0.48						
	Training between graduation and residency (traineeship) (months)			0.01	0.00				
	Required proficiency: B1/B2					0.00	0.00		
	Required proficiency: C1					0.37	0.40		
	Decision on specialisation: Graduation							0.00	0.00
	Decision on specialisation: Mixed							0.44	0.48
	Decision on specialisation: Residency							0.86	1.02
	Duration of residency years: maximum	-0.56*	-0.56 [†]	-0.49**	-0.38 [†]	-0.43**	-0.34 [†]	-0.26	-0.13
Expected wage	Start wage as resident (minimum, gross, thousands of Euros per year)	0.03**		0.04***		0.03***		0.03**	
	Wage last year's residency (maximum, gross, thousands of Euros per year)		0.02 [†]		0.02*		0.02**		0.02 [†]
	Density: GPs per 100,000 inhabitants (logarithmic)	0.14	0.37	-0.05	0.08	-0.07	0.05	-0.07	0.02
	Population size (millions, logarithmic)	0.64***	0.63**	0.61***	0.56***	0.61***	0.57***	0.52***	0.46**
	Constant	1.34	0.81	1.46	0.69	1.10	0.48	0.15	-0.64
	Observations	26	23	26	23	26	23	26	23
	Adjusted R ²	0.649	0.486	0.650	0.465	0.669	0.492	0.676	0.506

Note: Reference categories: B1/B2 proficiency, decision on specialisation: Graduation. Type of admission: Deregulated.

The number of months needed for training between graduation and residency produces no effect at all, irrespective of how we model it (see tr11a and tr12a in Table 2). Proficiency levels are also insignificant and keep showing that, within the sample, students slightly prefer the countries where a higher proficiency level is required (see p01a and p02a in Table 2). However, without knowing students' abilities in

speaking the host country language, one could not jump to a clear conclusion in this respect. Also insignificant, the moment of the decision about specialisation is loosely associated with the sample concerning their migration intentions: the students have a slightly higher preference for systems that postpone the decision about specialisation to a later stage.

The results remain virtually unchanged when the sample is reduced to the countries to which at least 1 student intends to migrate. Overall, we are left with the strong and stable effect of residency duration (see *tst01a*, *tr11a*, *p01a*, *s01a* in Table 2) and with the attraction of higher payments and bigger countries.

Discussion and implications

The paper explores the complex interplay between regulations, the migration intentions of medical graduates from Romania and the dynamics of healthcare systems. The analysis reveals that medical graduates from Romania who emigrate are influenced by various pull factors, stressing the main factors related to residency that increase the attractiveness of European destinations.

Germany, the United Kingdom, France, Sweden and Belgium were the top choices as European destinations for Romanians. The bivariate analysis highlighted the preferences of medical students, revealing that 69 per cent of them expressed an intention to migrate to countries without a national exam requirement for admission to medical residency, while 31 per cent preferred countries with a rigorous examination. Among those considering destinations with a stringent national exam, 48 per cent specifically favoured France, 23 per cent Spain and 21 per cent Italy. The percentage of students who opted for countries with mild examinations is less than 1 per cent – at 0.4 per cent.

When considering the multivariate analysis, only residency duration (see *tst01a*, *tr11a*, *p01a*, *s01a* in Table 2) and expected wages (see *tst01a*, *tst02a*, *tr11a*, *tr12a*, *p01a*, *p02a* in Table 2) emerged as significant drivers of migration preferences. The longer the residency takes, the less attractive the country becomes. Conversely, higher wages at both the start and the end of a residency, enhance a country's appeal. While the size of the country also plays a role (all models), market demand does not significantly influence migration intentions.

A significant pull factor identified in the top destination countries is the ability for graduates to choose their specialisation, rather than having it assigned based on their exam performance. A later decision on specialisation manifests a positive effect (see *s01a* and *s02a* in Table 2) within the sample but is not significant, thus not allowing the generalisation of these findings. The same applies to the higher requirement for language proficiency (see *p01a* and *p02a* in Table 2) which, within the sample of countries, slightly increases migration intentions. Romania faces a critical need to improve its medical residency system in order to address factors driving physicians' migration. This includes reforming the current entry system for medical residency students. Romania should consider models like those in Germany or Switzerland, which are known for their transparency, meritocratic selection and emphasis on practical training. Additionally, addressing issues of low wages, inadequate working conditions and limited opportunities for professional growth remains crucial to retaining skilled healthcare workers and alleviating the nation's shortage of medical professionals. Destination countries, particularly those identified in the study, also have a responsibility. They should consider the ethical implications of attracting foreign medical talent and ensure that their healthcare systems can effectively accommodate and integrate these professionals.

This study underscores the necessity for Romania to reform its residency training system, particularly regarding transparency in admissions, alignment with European best practices and

improved financial incentives. Additionally, destination countries must consider the ethical implications of attracting foreign-trained medical professionals to ensure sustainable workforce planning. These findings are in line with more recent studies emphasising that institutional pull factors remain decisive. Zapata *et al.* (2025) argue that adequate policy responses can mitigate migration, while Apostu *et al.* (2022) provide evidence on the importance of language and professional requirements. Incorporating such perspectives reinforces the policy relevance of our results and suggests that reforms in Romania should target both regulatory transparency and professional development opportunities. My study provides a fresh perspective on how regulatory frameworks shape medical graduates' migration patterns. Unlike prior research that primarily emphasised economic incentives, our findings highlight the importance of institutional structures in determining migration flows. Future research should explore longitudinal data across a greater number of years and conduct in-depth interviews with migrating physicians in order to better understand their motivations.

The data used to measure students' intentions to emigrate are derived from 2016, reflecting the latest available information. Unfortunately, due to limitations in data accessibility, more recent data could not be obtained. It is crucial to acknowledge that intentions expressed by Romanian medical students may evolve and that the study's findings should therefore be interpreted with caution given the age of the data. Additionally, it is imperative to note the inherent challenge in obtaining precise information regarding the intentions of Romanian medical students to emigrate to specific countries. The lack of available data from official institutions such as the Ministry of Health or the Romanian College of Physicians poses limitations and the study relies on alternative sources to capture insights into this complex phenomenon.

Data from 2016 may seem old for assessing the current situation. However, the analyses revealed patterns that show associations between phenomena for which the period constraint is unlikely to occur. I nevertheless believe that, despite more recent changes in society, the findings remain relevant for understanding the structural factors driving the migration intentions of Romanian medical students. For instance, it might be the case that Brexit removed (or not) the UK from the list of top destinations but the fact that entry requirements or foreseeable wages act as pull factors remains. In addition, I stress once more that this study is among the very few that discuss medical *students'* intentions to migrate, while the bulk of the literature is devoted to the emigration of medical *doctors*. Nevertheless, further research to confirm the stability of the findings with data collected in the coming years would be more than welcome.

Note

1. Response to address no. 1934/a/08.02.2023.

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Conflict of interest statement

No conflict of interest was reported by the author.

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Between Returning from Abroad and Remigration: A Contextual Approach to the Case of Romania

Dumitru Sandu*

Why do Romanians go abroad? Higher salaries, better conditions for practising the professions known or desired, the dissatisfaction here, compared to the opportunities perceived there? How to explain remigration abroad, after returning? These are the research questions we address here. Since return migration and emigration are complex transnational relations, we are using multiple methods of analysis and national, community and individual data, all of which are subordinated to the idea of a context analysis for understanding the above-mentioned relation for the case of an Eastern European country, Romania. The key finding is that social justice is lower in places with many return migrants from abroad. This is another finding that could support the idea that re-migration abroad is not only economically determined but is also related to the quality of public institutions. The paper also supports the idea that a good understanding of the community context of emigration abroad – by considering accessibility to large cities, historical regions of the community location and the main destination countries – could contribute to better policies in the area.

Keywords: return migrants, potential migrants, migration motivation, comparative analysis, multiple regression

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Introduction

What is the relationship between returning to the country of origin and migrating abroad again (remigrating) or the intention to remigrate abroad? This is our research question, which we are trying to answer for an Eastern European society – Romania. The approach we use is, first and foremost, comparative and pursues, in particular, the specific (net) effects of individual, community, regional and national factors. The essential relationship we follow is that between returning to the country, short-term working, living abroad (temporary emigration) and the motivation for migration/migration aspirations, within transnational relations (Aslany, Carling, Mjelva and Sommerfelt 2021; Carling and Erdal 2014; Massey, Arango, Hugo, Kouaouci and Pellegrino 1998).

The theme and the questions associated with it are all essential, both practically and theoretically. Migrants returning from abroad could reduce the country's demographic decline, population decline processes, ageing, labour shortages, etc. It could signal a reduction in the gaps in living standards between Romania and other European countries. Depending on where the returns take place, it could be a question of changing the development gaps between different regions or localities of the country. If we keep under control the characteristics of local communities and regions of residence, we can speak of a specific effect of returning to the home country on emigration or emigrating again (re-emigration). To answer such a question, we resort to multiple, multilevel data because, otherwise, they have limited coverage.

In the first section of the article, we present data from Eurostat and the National Institute of Statistics (NIS)¹ which introduce the surprise, for Romania, in 2022 of registering a flow of returns to Romania stronger than that of migrating abroad (emigration). Is it a structural change, a lasting transition or an emigration to an immigration society? We will elaborate. The second section follows, with data at the level of the local administrative unit (LAU) about the relationship between return migration from abroad and emigration, either for new emigrants or for re-migrants. What role does the development of localities play in these processes? What about the region to which the localities belong? What about the countries of destination of the migration flows? Multiple regression models are put to work to elucidate the relationship between development and migration abroad. Validation and sensitivity analyses are correlated procedures, both contributing to the higher credibility of the analysis to the reader. External or criterion validity (Babbie 2020) is accomplished by putting intentions to emigrate in relation to the status of former migrants among the predictors of these intentions. Sensitivity analysis (Treiman 2014) is done by comparing general rates of emigration from local communities (Table 1) with rates of emigration to specific countries (Table 2). Even if different, validation and sensitivity approaches contribute to a higher credibility of the analysis for the reader. It is assumed – based on this approach – that, if the results are similar for different method specifications, then the analysis can be considered valid.

The third section presents survey results with data at the individual level, for the prediction of the intention to emigrate from Romania, compared to those of European societies (Black, Pantîru, Okólski and Engbersen 2010). A special subsection is dedicated to comparing the motivations or aspirations (de Haas 2021) of the potential emigration of Romanians with the motivations of persons from the other 5 countries in the Eastern part of the European Union – Poland, Czech Republic, Slovakia, Hungary and Bulgaria (Sandu 2024a).

Methodological premises

The article uses either specific models for a single level or models with the integration of variables measured at different levels (Hox, Moerbeek and van de Schoot 2017) in the same multiple-regression model. The first approach is at the national level and is strictly descriptive. The second is at the community level, where we contextualise by historical regions. The third model is at the individual level, with survey data collected from Eurobarometer interviewees.

We use data collected at different levels – national, community and individual – because the essential relationship of the analysis, that between return and remigration/emigration, is a transnational one. The type of transnationalism (Carling and Erdal 2014) that interests us here is a post-return type. Those who have returned to their localities of origin are either influenced by their own experience of living abroad when re-migrating or they are influenced by their culture or by the relationships that other people in the community have with going abroad. The data at the place of origin for the first emigration and, subsequently, for the first return, are relatively poor. There are very few exceptions proving that international migration is a multi-level phenomenon, with specific drivers at these levels (Williams, Jephcote, Janta and Li 2018). A comparative survey of young people in 9 European countries proves that the drivers of potential emigration are different from country to country and that the social category of interviewees counts a lot. Additionally, international migration systems proved to be multilevel ones, especially involving heterogeneous societies (Sandu 2025). Data at individual and community levels are compared to better understand the effects of socio-economic status on mortality (Moss, Johnson, Yu, Altekruse and Cronin 2021). These are the main reasons why, in the same analysis, we use multiple methods and data collected at different levels. In addition, post-return transnationalism has strong interdependencies with a person's remigration or with the emigration of other people from the same living space.

The analysis at the national level, in the first section, is descriptive, with a focus on presenting the data on return from abroad to Romania and emigration from the country, over time (Reștea 2024; Sandu 2023). The approach at the level of the local community (administrative-territorial unit ATU), in the second section, is of a predictive-explanatory type and uses data from the NIS, produced at censuses. The regression models at the community level operate with a minimum of 2,728 ATU, out of 3,151 that existed at the 2021 census. The variation is given by the availability of computing data. The local human development index (LHDI 2018) was computed only for localities that had more than 1,000 inhabitants in order to avoid the instability of the figures for the very small communes or towns, which was the case for about 100 small ATU. Similar problems were recorded for other predictors or by administrative redefinition of localities in time, after 2002. However, data from administrative territorial units are not a sample; they represent approximately 85 per cent of the country's ATU, thus we had adequate measures to build regression equations.

In the third section, we operate with individual data from the Special Eurobarometer 528 survey, collected in June 2022.² The basic theme of the survey was intra-European mobility. We operate, also at this level, with multiple regression models in which the dependent variable is, however, the intention to emigrate abroad, as a dichotomous variable (logit, not ologit or regress commands in STATA).

The sections on community and individual levels are structured around the hypothesis of former migration abroad as a factor to stimulate remigration based on learned behaviours and/or life dissatisfaction at personal and community levels. It starts from previous studies proving that remigration intentions or behaviours are, *caeteris paribus*, learned behaviours by those formerly living or working abroad (Bernard and Perales 2021). We underline, through this hypothesis, that remigration

is not only an individual-level phenomenon but is also favoured by community interactions among former migrants and non-migrants. Living in a local community with a great number of returnees stimulates the remigration of former returnees but also the emigration of former non-migrants. Interpersonal knowledge and social contagion allow for this process.

The main predictors that are of interest in this case are the return migration from abroad and the individual evaluation of social justice in the reference society. The meaning of social justice could be different in the minds of interviewees. Very probably, it could be associated with distributive justice, institutional fairness, marginality, critical thinking etc. (Scott and Marshall 2009; Veeramoothoo 2022). Gender, age, personal education, parents' education and the residential environment are control variables. Due to the fact that we are interested in the role of perceived social justice for emigration intentions, we also present a descriptive table with the perception of social justice in the residence country (Table A3). We can see that returnees on the move, in Romania, are the most dissatisfied with the social justice in their country. Multiple regression models predicting migration intentions also include the perception of social justice. We expect to find Romanians with emigration intentions, as significantly predicted by their dissatisfaction with social justice.

Multiple regressions in Tables 1 and 2 used predictors that measure factors or conditions of emigration at the community level for previous censuses (2002, 2011), moments before the measurement time for the dependent variable (measured at the 2021 census). Predictors that are also measured in 2021 (rates of returnees, for example) are proxy measures for a culture/values favouring migration abroad at the community level.

All the time that we are using regression analysis, we intend to reveal causal relations among migration abroad variables and the factors influencing them, at the community, regional or national level. Descriptive analysis is more for stimulating the emergence of research questions. Where the data allowed it, regardless of the level of analysis, we also promoted sensitivity analysis (Treiman 2014), in the sense of varying the analysis method to see to what extent the results are relatively stable.

A first example of the validation of results by sensitivity analysis is related to the national level. With Eurostat data, we found that the number of returns from abroad increased considerably in Romania in 2022, to about 190,000 people. At this level, however, the data are poor. They allow more questions, such as: Why did the number of returns suddenly increase in 2022? Was it only a compensation effect of the Covid-19 pandemic of 2020–2021 or were other factors also acting? With what verifiable proxies can the unreported data for the 2023 recovery be estimated?

The second example of sensitivity analysis is related to the individual level. We are also using individual data to better explain the intention to migrate abroad for the largest countries in the Eastern European Union (EEU). Indeed, the mechanism allowing for consistency between community and individual data analysis could be quite different. We can see in Table 1, for example, that local communities with more emigrants abroad are, at the same time, communities with more returnees from abroad. This could be an effect of learning about migration or the contagion of migration culture. In Table 3, the data are at the individual level and one finds that, for the majority of the countries, there is a trend of returnees remigrating. This, again, could be an effect of learning about foreign societies through migration experience. Contagion is no longer an obvious latent and intermediate variable, as in the case of community analysis. So, parts of intermediate latent variables could be different but the consistency of relations is obvious.

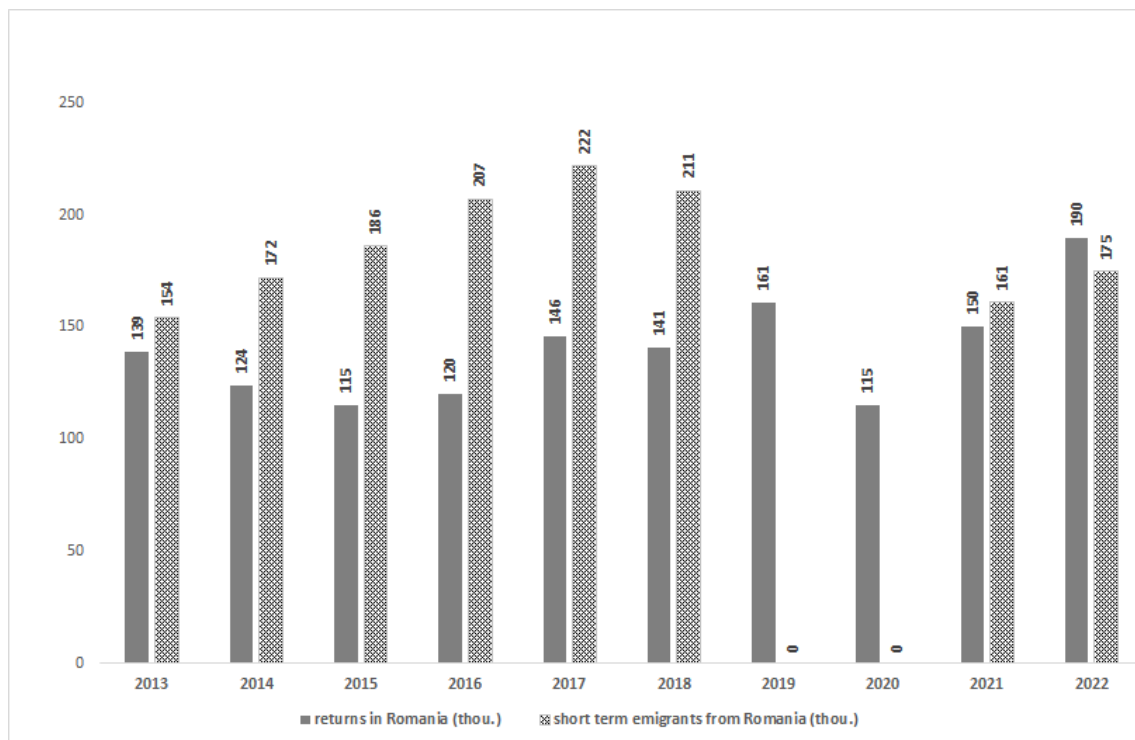
Combining community- and individual-level analysis is required by the fact that the intention to work and live abroad is a multidimensional phenomenon, including new migrants and return migrants. Both of them are conditioned by latent variables of learning abroad about migration and contagion effects

between former migrants and intending ones. It is rare, if not impossible, to get representative samples of individuals from the same community. Combining community and survey data, as we did, is a reaction to the nature of migration abroad and to the constraints on research in the area. All the regression models (Table 1 to Table 4) are tested by the variation inflation factors (VIF) for multicollinearity, in STATA. As indicated in the literature, no VIF is larger than 4.

A growing trend of return to the country?

The trend (see Figure 1) was for the number of Romanian citizens who emigrated for more than a year to other countries to be higher than for those who returned to the country. This is what the long-term process looks like with data from Eurostat. Unfortunately, the Eurostat data to which we refer (because they do not amalgamate foreign immigrants with Romanian citizens returning to the country) are not available for the years 2019 and 2020. In addition, Eurostat's reporting on that indicator stops in 2022.

Figure 1. Short-term emigration of Romanian citizens and Romanian returnees in the country 2013–2022



Source: Eurostat. Own design, DS. Data for 2019 and 2020 are unreported by Eurostat. Reștea (2024) indicates the National Institute of Statistics (NIS) as a source for returnees in 2019 and 2020. Immigrants who are not Romanian citizens and emigrants from Romania who are not Romanian citizens are not included here. These are stock data.

With the series from 2013 to 2022, however, the data indicate that 2022 is an exceptional year, one in which the returns exceed by about 15,000 the number of temporary emigrations by Romanian citizens. Is this the beginning of a new trend in which returns to the country outnumber emigrations? It could be so. The data published by Eurostat indicate that the immigration of Romanian citizens who were former migrants abroad increased in 2023 to 218,000 and, in the same year, the number of

Romanian emigrants decreased to 151,000. Difficult or, more precisely, impossible to say – with the poor and contradictory data which we have – what the trend will be in the future. This is the reason why we consider it more prudent to adopt the procedure of multiple comparisons, to integrate return into all international migration processes (actual emigration, intention to emigrate, intention to return), to mention the conditioning of those processes and the European trends. This is what we are still trying to do. When the 2021 census microdata become available, the analyses will be able to be detailed. For now, we can talk about the increase in returns in 2022 and 2023 as a possible recovery from the decline of 2020 and 2021. In support of this interpretation, the associated NIS data regarding the permanent immigration of Romanians (Table A1 in the Annex) are also provided. With the Eurostat data, it is very clear that the permanent, long-term immigration of Romanian citizens who have been abroad increased from 190,000 in 2022 to 218,000 in 2023.

As there is probably a significant and positive relationship between permanent and temporary immigration, it can be considered that, for the time being, we have empirical evidence for the fact that the increase in immigration in 2022, whether permanent or temporary, was predominantly a recovery of the reductions in returns following the pandemic. It will be possible to speak of a lasting trend of returns to the country if Eurostat data for 2024 indicate this. For now, this is not the case.

We are still trying to better understand the relationship between the returns to the locality from abroad – before the 2021 census – and the departures abroad, in the short term, as recorded in the respective census, from the same locality. We move from a discussion related to the volumes of returns at the national level to one regarding conditioning, the causes of return to the locality and departures. In this section, the focus is on the relationship between returns from abroad and departures locally. Departures are short-lived – less than a year – and returns can be at any time before the 2021 census. We do not know, with the aggregated data at the level of the ATU (administrative-territorial unit), whether some of the people temporarily absent from the country have not also returned from abroad, at any time before the census.

Why does the return bring emigration from many localities of Romania?

If you ‘take a trip’ in the more than 2,700 localities for which you have the necessary data for analysis, you find the answer to one of the questions in the introduction. We made just such an imaginary journey with the help of multiple regression models in which the dependent variables are the rates of return to the locality and those of short-term departure (emigration) from the locality. Predictors and independent variables can be classified into 5 categories:

1. Conditions of local development (urban or rural residential environment, a synthetic index of proximity to large IURCON cities, shares of active population in industry and, separately, in services, the average age of the population in the locality);
2. Regional conditions of local development (the historical region to which it belongs, with Muntenia as a reference, plus the gross domestic product *per capita* at the county level);
3. The level of human development of the locality, estimated based on an index (LHDI) for 2018 (Sandu 2024b);
4. Return-to-locality rates from the main destination countries (Italy, Spain, France, Germany, Austria, the United States of America and Canada); and
5. The experience of migration in the locality (IMIGEXPER integrating local data on departures abroad in 2002 and 2011, the rate of returns from abroad recorded in the 2021 census and the net migration rate of the population residing in the locality in 2021).

6. We used these 25 predictors from the 5 classes to estimate the rate of emigration from the locality at the 2021 census. In a separate regression equation, we used the rate of returns from abroad, before the 2021 census, as the dependent variable, together with 24 of the previously mentioned predictors. The results of the estimates are presented in Table 1.

This is how we found out that Romanians leave the host country abroad, among other things – but in a significant proportion – because they have learned this from previous migration experiences. In other words, the probability of leaving the country in the short term (or perhaps in the long term but we do not have the necessary data in this regard) is higher because this is what some locals have learned from previous migration experiences – their own or those of their cohabitants. Specifically, those who have returned home from abroad tend to be among the first to opt for re-migration – to go back to another country. Of course, this is not the only reason for emigration. It is, however, very likely one of the more significant reasons.

Otherwise, the data we present will say what we expected but with some nuances. High values of urban accessibility favour emigration only for the case of Italy as a destination (Table 2). If the place of residence is rural and with reduced development (lower LHDI) in Romania, the emigration trend will be stronger. As poverty in Romania is consistently higher in the countryside than in the city, the emigration trend will be stronger for those in rural areas, especially in relatively isolated rural areas, where more young people live. Here, the desires of the type ‘we want a country, like, outside’ (affirmed as such in the strong social movement in Palace Square, in August 2017) are systematically stronger and better crystallised. Correspondingly, emigration is higher from the relatively isolated countryside, far from the big cities.

Local migration experiences can be internal – within the country, estimated by the net migration rate – or external. The data in Table 1 support the idea that both types of experiences matter for EU emigration. Fewer people go abroad (relatively speaking, about the local population), where net migration rates are higher (more arrivals than departures) and returns from abroad are lower.

Nevertheless, the migration experience of the local community matters considerably in the equation of overseas placements. The statement is based on the results of the hierarchical regression (with variable blocks) in Table A2, in the Annex.

Surprisingly, also with the data from there, we find that local development in synthetic form (LHDI) does not matter significantly in the equation. The premises of local development (residential environment, urban accessibility, average age and employment areas of the working population) are more important in determining emigration abroad. This finding is important because it suggests the increased initiation of actions to positively modify the conditions of local development within development policies.

How are the communities with a high share of returnees already highlighted as places of intense departure abroad? The answer to the question results from the second regression equation in Table 1. In many respects, they resemble the localities from which many short-term departures abroad took place. They are also predominantly rural. However, there are also major differences in the sense that the localities of return are no longer mostly poor.

Urban connectivity stimulates short-term emigration from rural communities (IURCON) only for Italy as a destination (Table 2), not for all short-term emigration abroad (Table 1). It is not clear why the selectivity of the emigration function only for this destination country. The historical region of Moldova is the preferred origin of emigration to Italy. One could infer, consequently, that the rule of conditioning emigration to Italy is conditioned by urban accessibility, especially in this region.

Table 1. Predicting short-term emigration rates from Romanian communities, irrespective of the destination country, 2021

Predictors		Y-rate of short-term population abroad 2021			Y-rate of returnees from abroad 2021		
		Unstandardised coefficients	Standardised coefficients	Sig.	Unstandardised coefficients	Standardised coefficients	Sig.
		B	Beta		B	Beta	
	(Constant)	63.050		.000	-36.074		.000
1. Local conditions of development	Urban residence (1 = yes, 0 = no)	-13.625	-.109	.000	-4.496	-.060	.010
	IURCON index of urban connectivity of locality	.400	.004	.831	.491	.009	.648
	% active population working in processing industry 2011	-.425	-.104	.000	.046	.019	.454
	% active population working in services 2011	-.218	-.081	.008	.015	.009	.746
	average age of population by domicile 2018	-.903	-.074	.000	.411	.057	.003
2. Regional conditions of local development	GDP <i>per capita</i> in the county including the locality 2017	-.546	-.100	.000	-.025	-.008	.741
	MOLDOVA historical region	7.237	.075	.013	10.374	.179	.000
	OLTENIA historical region	2.926	.025	.250	-1.752	-.025	.222
	DOBROGEA historical region	12.553	.060	.003	5.147	.041	.035
	CRISANA-MARAMURES historical region	9.835	.076	.003	5.682	.073	.002
	BANAT historical region	14.529	.081	.001	5.494	.051	.022
	TRANSILVANIA historical region	5.759	.059	.023	6.446	.111	.000
	BUCURESTI-ILFOV	11.005	.033	.107	.394	.002	.919

3. LHDI	LHDI 2018 Local Human Development Index	-.302	-.095	.001	.012	.006	.822
4. Rate of returnees by former residence country	Rate of returnees from Italy 2021	-.035	-.018	.434	.058	.051	.021
	Rate of returnees from Spain 2021	.038	.017	.411	.106	.077	.000
	Rate of returnees from Germany 2021	-.110	-.030	.139	.148	.068	.000
	Rate of returnees from France 2021	.313	.052	.004	.300	.084	.000
	Rate of returnees from Austria 2021	.645	.067	.000	.563	.097	.000
	Rate of returnees from the UK 2021	.090	.021	.247	.091	.036	.038
	Rate of returnees from the USA 2021	-.634	-.036	.047	.221	.021	.224
	Rate of returnees from Canada 2021	.395	.010	.573	-.229	-.010	.569
5. Local migration experience	Net migration rate of domicile population 2021	-.234	-.070	.000	.432	.214	.000
	IMIGEXPER index of local migration experience, 2002 and 2011	.705	.243	.000	.595	.345	.000
	Rate of returnees 2021	.314	.189	.000			
R2		0.223			.275		
N		2,728			2,802		

Source: National Institute of Statistics (NIS). Own computations. Two OLS models. Y – dependent variable in the regression model. Emigration and returnees rates are computed as rates to 1,000 usual residents in the locality, 2021. See Sandu (2024b) for the computations on LHDI 2018 and IURCON. GDP data are from Eurostat. Cells are shaded where the regression coefficients are significant for $p < 0.05$. Example: a one-unit increase on LHDI 2018 reduces the short-term emigration rate by -.302 units, on average. The B coefficient is statistically significant for $p = 0.001$.

Table 2. Predicting the short-term emigration rates from Romanian communities to the main destination countries, 2021

Predictors	Y= short-term emigration rate to...											
	Italy		Spain		France		Germany		Austria		United Kingdom	
	B	p	B	p	B	p	B	p	B	p	B	p
(Constant)	-2.145	.609	3.877	.167	1.891	.498	3.877	.167	4.282	.039	11.053	.000
LHDI 2018 Local Human Development Index	-.118	.000	-.004	.863	.008	.719	-.004	.863	-.018	.268	-.030	.118
Urban residence (1 = yes, 0 = no)	-3.895	.000	-2.038	.005	-.537	.458	-2.038	.005	-.614	.254	-2.024	.002
IURCON index of urban connectivity of locality	1.786	.007	-.563	.207	.474	.285	-.563	.207	-.020	.951	-.241	.542
% active population working in processing industry, 2011	-.120	.002	-.086	.001	-.105	.000	-.086	.001	-.040	.034	-.046	.041
% active population working in services, 2011	-.025	.395	-.090	.000	-.017	.387	-.090	.000	.008	.578	.013	.447
Average age of population by domicile, 2018	-.034	.687	-.044	.441	-.073	.192	-.044	.441	-.059	.159	-.220	.000
GDP <i>per capita</i> in the county including the locality ,2017	-.101	.029	-.139	.000	-.050	.101	-.139	.000	-.070	.002	-.063	.023
MOLDOVA historical region	6.003	.000	-2.042	.003	-.960	.160	-2.042	.003	-.965	.058	2.456	.000
OLTENIA historical region	.712	.423	-.074	.902	.098	.868	-.074	.902	.047	.916	.582	.269
DOBROGEA historical region	4.293	.005	4.033	.000	-.164	.871	4.033	.000	.080	.914	.212	.813
CRISANA-MARAMURES historical region	3.290	.004	-1.188	.123	3.290	.000	-1.188	.123	1.349	.018	1.300	.057
BANAT historical region	2.962	.046	-.157	.875	.603	.542	-.157	.875	5.167	.000	.162	.854
TRANSILVANIA historical region	-.017	.985	.382	.525	.597	.318	.382	.525	.698	.116	-.379	.476
BUCURESTI-ILFOV	6.064	.012	4.354	.007	.354	.826	4.354	.007	1.227	.305	-.263	.854
Rate of returnees from Italy, 2021	.254	.000	.167	.000	.074	.000	.167	.000	.025	.060	.065	.000
Rate of returnees from Spain, 2021	.157	.000	-.031	.003	-.002	.824	-.031	.003	.000	.961	.003	.710

Rate of returnees from Germany, 2021	-0.028	.079	.209	.000	-.002	.818	.209	.000	-.003	.667	.008	.414
Rate of returnees from France, 2021	-.064	.014	-.046	.009	-.033	.058	-.046	.009	-.031	.017	-.029	.064
Rate of returnees from Austria, 2021	-.039	.312	-.006	.803	.560	.000	-.006	.803	-.027	.157	.004	.869
Rate of returnees from the UK, 2021	-.021	.754	.049	.267	-.017	.701	.049	.267	.711	.000	-.039	.320
Rate of returnees from the USA, 2021	.001	.960	.006	.737	-.001	.954	.006	.737	-.004	.738	.219	.000
Rate of returnees from Canada, 2021	-.137	.226	-.100	.185	.042	.580	-.100	.185	-.078	.161	-.083	.213
Net migration rate of domicile population, 2021	-.463	.063	-.136	.416	-.207	.211	-.136	.416	.044	.719	-.188	.204
IMIGEXPER index of local migration experience, 2002 and 2011	-.054	.024	-.028	.082	-.021	.182	-.028	.082	-.014	.221	-.033	.017
Rate of returnees, 2021	.068	.000	.033	.000	.006	.439	.033	.000	.014	.014	.018	.011
R2	0.319		0.237		0.206		0.237		0.242		0.164	
N	2,802		2,802		2,802		2,802		2,802		2,802	

Source: National Institute of Statistics (NIS). Six computations. Two OLS models. Y – dependent variable in the regression model. Emigration and returnee rates are computed as rates to 1,000 usual residents in the locality, 2021. The cells where the regression coefficients are significant for $p < 0.05$ are shaded. Example: a one-unit increase on LHD1 2018 reduces the short-term emigration rate to Italy by -.118 units, on average. The B coefficient is statistically significant for $p = 0.001$. Example: the higher the rate of returnees from Italy in a Romanian community, the higher the rate of emigrants in one of the 6 countries that are the main destinations for Romanians in Europe (Italy, Spain, France, Germany, Austria, the UK).

So what are the localities like, in terms of their regional and development profile, according to the emigration rates by specific destination countries? We ran 6 multiple regression equations, 1 for each type of emigration to the main destination countries (Table 2). The regional specificity of short-term emigration is very high. Departures to Italy, for example, are mostly made from the historical region of Moldova, those to France from Crişana-Maramureş, to Austria from Transylvania and to Great Britain from the Bucharest-Ilfov area. The picture of emigration destinations in 2021 is largely consistent with that recorded at the penultimate census in 2011 (Sandu 2018).

Next, we move on to a more detailed understanding, at the individual level, of the relationship between potential emigration and return from abroad, using survey data. Such an analysis, we hope, will help us, to a greater extent, to understand the motivations of migration abroad/non-migration. If regressions with individual-level data reconfirm the significant relationship between return and remigration, then the findings from community-level analyses are largely maintained and validated.

Approach at the individual level

The chain of the process of emigration–return to the country of origin and, eventually, remigration abroad can be observed, at the origin of the process and the individual level, especially concerning the relationship between the experience abroad and the intention to emigrate. In the case of Romania, we continue to focus on this relationship, using data from a special Eurobarometer survey in the summer of 2022. Is there a specific effect of previous residence abroad on the intention to emigrate, even if the influence of other factors is controlled? To answer the question, we analysed 24 countries in the European Union (except for 3 of them for which the samples were very small). The results, presented in Table 3, clearly support the affirmative answer to the previous question. In 18 of the 24 countries for which we ran the same logistic regression model, the intention to emigrate was stronger in the case of people returning from abroad. The mentioned significant relationship is also recorded in the case of Romania, the country of interest in this framework.

For the analysis of emigration intention, we used 10 predictors, most of which were status variables (gender, age, own education, parents' education, residential environment), some of them measured at the nominal level. Status conditions differ from country to country but the dominant meaning is clear, with young people tending to emigrate in most cases.

In the equation, we also included as a predictor a subjective variable related to social justice satisfaction (SJS) in the country of residence at the time of the survey. In this regard, the participant's agreement was requested about 3 statements regarding the perception of social justice in his case, both for others and in terms of social non-discrimination. The Social Justice Perception Index was constructed as a factor score, multiplied by 100. Only 4 of the 24 countries analysed – Romania, Poland, France and the West German regions – had a negative relationship in the sense that the intention to go abroad is stronger among those who perceive that social justice in their own country is lower. It is difficult to say why, in only these 4 countries, statistically significant and negative regression coefficients are recorded, in the case of the respective predictor. Further analysis is needed to clarify the meaning of the prediction patterns for all the countries.

Table 3. Predictors of intentions to emigrate

Country and cluster of countries	Predictors of intentions to work/live abroad									
	Man*	Tertiary education*	Secondary education*	City resident*	Returnee*	Mother with tertiary education*	Father with tertiary education*	Age < 35 years*	Age > 54 years*	Social justice in her/his own society
FR	0.402	-0.256	-0.78	0.266	1.63	-0.002	0.238	1.397	-3.075	-0.004
FI	0.357	-0.296	-0.509	0.406	1.914	0.018	-0.151	0.698	-2.875	0.001
BE	0.299	-0.104	-0.89	-0.008	1.545	0.729	-0.094	0.634	-2.256	0.001
DK	0.622	-0.411	-0.203	0.536	1.164	0.146	0.449	1.266	-1.695	0.003
SE	0.38	0.127	-0.345	0.179	1.019	0.061	0.369	1.252	-1.782	0.002
LV	0.458	-0.373	0.258	0.702	0.638	0.191	0.45	0.644	-2.567	0.000
CZ	0.545	-0.896	-0.894	0.122	1.875	0.566	0.472	1.051	-3.402	0.000
HU	0.438	-1.029	-1.145	-0.14	1.698	1.489	0.101	1.492	-2.258	0.000
PL	0.884	-0.522	-0.677	-0.41	1.717	1.04	-0.052	1.143	-2.799	-0.002
NE	0.389	-0.132	-1.398	0.128	1.233	0.155	0.83	1.26	-1.206	-0.001
IE	0.515	-0.56	-0.644	0.298	0.847	0.042	1.33	1.74	-1.365	-0.003
IT	0.012	-0.914	-1.564	0.049	1.76	-1.249	1.443	2.269	-1.588	0.002
AT	0.249	-0.381	-0.893	0.306	2.034	-0.035	0.665	1.427	-1.607	-0.001
DEW	0.355	-0.822	-1.504	0.343	1.533	0.355	0.731	0.909	-2.354	-0.001
DEE	-0.114	-1.134	-1.614	1.021	0.947	0.217	0.587	1.035	-1.773	0.006
SI	0.485	-0.185	-1.044	0.371	0.931	0.41	1.188	0.683	-2.683	0.001
ES	0.168	-0.304	-0.359	0.174	1.495	0.445	0.5	1.283	-1.386	0.000
HR	0.096	-0.043	-0.225	0.107	1.215	0.116	0.567	0.636	-1.944	-0.001
GR	0.418	-0.3	-1.834	-0.058	1.013	0.059	0.295	1.698	-2.464	-0.001
SK	0.817	-2.237	-1.687	-0.186	0.767	-0.36	0.483	1.755	-2.465	0.001
PT	-0.022	0.286	-0.068	0.25	1.285	1.159	-1.214	1.589	-1.999	0.001
BG	0.074	-0.094	-0.11	0.128	2.032	0.957	-0.52	1.413	-2.146	-0.003
RO	0.076	-0.25	-0.31	-0.456	1.341	-0.035	-0.626	1.536	-2.741	-0.005
LT	0.402	-1.3	-1.147	0.317	1.667	0.381	0.178	1.475	-1.723	-0.003

Source: Eurobarometer 528, May–June 2022. Logistic regressions (command `logit` for dummy dependent variables), in STATA, for each of the 23 EU countries (not including sub-samples for small countries like Luxembourg, Malta, the Republic of Cyprus, Estonia). We used weighted data, with a variable constructed by the Eurobarometer surveyors (`w93` in the original data file) so as to get a sample population that is representative of the country’s adult population. The total EU population who were interviewed, unweighted, is 26,390. The weighted interviewed population, including the small countries mentioned above, is 25,389. For coefficients that are significant for $p < 0.05$, the cells are shaded. Example: The probability of declaring the intention to emigrate is, *caeteris paribus*, higher in Finland for young returnees.

DEW – West Germany. DEE – East Germany. See, for details, the source of the table in Sandu (2024c). Figures in the table indicate estimated coefficients, not odd ratios. The sensitivity analysis (Treiman 2014), by doing regression analysis with weighted versus non-weighted data, indicates small variations in the results and the function of weighting versus non-weighting the data.

A hypothesis to be tested with other data can, however, be advanced. It is expected that, in the survey, countries where returnees who plan to go abroad again will be more dissatisfied with social justice in their own country than those who have not been and do not plan to go abroad. Table A3 in the Annex supports the hypothesis. Romania is one of the countries where the satisfaction of returnees who want to emigrate abroad is lower than satisfaction with social justice in their home country, compared to those who have not been abroad and are not going to emigrate. The same is true with Poland (White 2014) and Bulgaria in Eastern Europe, as well as with France and West Germany. In other words, in 4 of the 5 countries where there is a negative relationship between the intention to emigrate and the SJS, there are also very large gaps between the low SJS for returnees who want to go abroad again and the high SJS for non-migrants who do not intend to leave.

To better understand the situation, we focused the analysis on surveyed people in 6 countries of the Eastern European Union (EEU), each of them with a population greater than 5 million people – Poland, Romania, the Czech Republic, Bulgaria, Hungary and Slovakia. Which of these countries has a similar determination of intentions to go abroad? For lovers of technical arguments, the answer starts from the data presented in Table 4. For those less interested in the technical aspects of the analysis, I present below the interpretation of that table.

We grouped, by factor analysis, the reasons for potential emigration, as declared by interviewees, into 5 main categories, namely salaries + employment, professional development + improvement in knowledge of a foreign language, lifestyle + culture, perception of social justice + proximity to another destination country and relationships abroad + previous residence in another country. We have retained in the analysis here only the first 4 categories of reasons. To predict them, we have added 8 more socio-demographic variables as predictors (see Table 4).

In all 6 countries, we recorded 2 equally important variables in generating emigration intentions to the EU. In all 6 EEU countries, those who want well-paid jobs and are young tend to go abroad. The migration experience also matters a lot. Those who have been abroad (for work, accompaniment or study) and have returned to their country of origin tend to leave again to go abroad.

In the series of reasons for departure invoked, after employment and salaries, we have the aspiration to improve either professionally or to learn a foreign language spoken in the country of destination. These 2 families of motive–aspiration (de Haas 2021) significantly determine the intention to emigrate to 5 out of the 6 countries analysed (the exception occurs in the case of the Poles interviewed). The third category of reasons that matter is related to the quality of the institutions of the rules applied to ensure social justice. Of the 6 countries analysed, only in Romania and Bulgaria is the lack of social justice associated with the intention to go abroad. The resulting hypothesis is very important for those who would like to design well-founded social policies in the field: if you want to reduce the propensity of young people to emigrate, then, apart from economic measures to increase the number of well-paid jobs, it is fundamental to reduce corruption in the country.

In none of the 6 countries analysed here do we see a significant impact of lifestyle-related motivations for potential emigration. We could translate this finding by considering that providing jobs, especially for young people, increased salaries, better conditions for professional development and reducing corruption can contribute substantially to reducing emigration.

For those interested in the multitude of comparisons used to contextualise the case of potential emigration from Romania, we mention that we have replicated the analysis in Table 1 for the subsamples related to the ‘old’ countries compared to the ‘new’ EU member states. The finding of interest here is that lifestyle and culture count as predictors of potential emigration, especially for the ‘old’ EU (results not presented here to avoid too many technical details).

Table 4. Predictors of intentions to work abroad: Romanians in a comparative perspective with interviewees of other people in the Eastern European Union

Predictors		Romania		Bulgaria		Hungary		Poland		Czech Republic		Slovakia	
		coeff.	p	coeff.	p	coeff.	p	coeff.	p	coeff.	p	coeff.	p
Reasons for potential emigration	Employment+money	0.006	0.000	0.005	0.000	0.006	0.000	0.005	0.001	0.004	0.000	0.003	0.010
	Social justice+neighborhood	-0.003	0.027	-0.004	0.004	0.000	0.826	-0.001	0.521	0.000	0.972	-0.001	0.509
	Improve profession+language	0.002	0.024	0.004	0.024	0.004	0.000	-0.001	0.505	0.003	0.000	0.003	0.034
	Lifestyle	0.002	0.212	0.000	0.804	0.000	0.846	-0.004	0.073	0.001	0.597	0.000	0.950
Socio-economic status	Former migrant abroad*	1.347	0.000	2.300	0.000	2.199	0.000	1.962	0.000	2.205	0.000	0.780	0.063
	Tertiary education*	0.102	0.808	0.861	0.014	-0.716	0.058	0.020	0.967	-0.114	0.744	-1.251	0.013
	Secondary education*	0.310	0.399	0.303	0.374	-1.015	0.001	-0.125	0.802	-0.096	0.797	-0.930	0.040
	Difficulties in paying bills*	-0.062	0.812	0.553	0.030	-0.161	0.566	0.583	0.151	-0.021	0.943	0.410	0.204
Demographic status	Man*	-0.013	0.957	0.041	0.859	0.528	0.022	0.663	0.034	0.603	0.014	0.815	0.005
	Age	-0.075	0.000	-0.098	0.000	-0.095	0.000	-0.085	0.000	-0.079	0.000	-0.116	0.000
	Living in city*	-0.551	0.081	-0.204	0.491	0.184	0.521	-0.313	0.420	0.034	0.914	-0.471	0.256
	Living in town*	-0.018	0.954	-0.790	0.034	0.278	0.373	-0.188	0.615	-0.353	0.306	0.395	0.212
_Cons		0.279	0.506	0.832	0.085	2.224	0.000	0.121	0.819	0.664	0.140	2.405	0.000
Pseudo R2		0.274		0.341		0.405		0.325		0.299		0.389	
N		1016		984		1014		1000		960		967	

Source: Eurobarometer 528, data collected May–June 2022. Topic: Intra-European labour mobility. Logistic regressions by the main countries of the Central and Eastern European Union by their population size. Shadow for regression coefficients that are significant $p < 0.05$.

From the same Table 4, we find out that, apart from gender, age and migration experience, the other predictors in that category, at least for the 6 countries analysed, matter less, especially in the case of Romania.

Conclusions

Each type of data that we used (national-, community- or individual-level) are quite poor, leaving us unable to offer the answer to the basic question of the relation between return migration and re-migration. This is why we had to use all 3 types of data. Sensitivity analysis encouraged us to use multiple methods and data for analysis.

In the long term, return migration from abroad to Romania was of lower intensity compared to temporary emigration flows. In 2022, the ratio between the 2 flows was exceptional, in the sense that return migration was stronger than emigration. Is this the beginning of a new trend? Was the reduction in returns in 2020 an effect of the Covid-19 pandemic? Was the increase in 2022 recoveries a catch-up effect of the 2020 decline? Were there other factors that led to the change in the relationship between the 2 external migration flows? With the data available for now, we do not know. It may also be that many of the emigrants have reached the retirement stage and returned to the country to live at lower costs (Dustmann and Weiss 2007).

In essence, it is likely to be a cumulative effect of the pandemic and the retirement of a significant number of Romanians abroad (the hypothesis of cumulative factors of remigration). Let us elaborate on the interpretative hypothesis of cumulative factors. This is, in fact, a modification of the initial hypothesis from the methodological section, supporting the view that re-migration is an effect of return migration. The Covid-19 pandemic has also been a major obstacle to circular migration between Romania and the host countries of Romanian immigrants. Hence, the trend is a strong reduction in returns to the country in 2020–2021. However, it is also the effect of a lasting trend. More and more Romanians abroad spent a considerable number of years there and then considered it time to return to the home country, to their families, friends and acquaintances, to occupy the homes which, in the meantime, they have built in the home country with money from migration (economic remittances). In the period 2015–2019, there was already a trend for an increase in the number of returns to the country. After the pandemic-induced decrease in this growth, in 2020–2021, a compensation process followed to recover the deferred returns, expressed through the increase in returns in 2022.

The analysis in this material also posits the hypothesis that, for a good many of the migrants returning from abroad to Romania, there are significant reasons for dissatisfaction that subsequently contribute to their re-migration or to them obtaining citizenship of another country (the hypothesis of re-migration as dissatisfaction). The feeling of social injustice in one's own country, in particular, can contribute to remigration. With the Eurobarometer survey data analysed, the situation seems to be the same in Poland, Romania, France and West Germany. Public policies in the field can be effective due to the fact that they are documented, to a greater extent, through surveys on Romanian migrants abroad, returnees and non-migrants.

Simply registering those who return to the country, without such research on institutional satisfaction, is not enough to substantiate sustainable migration and development policies.

To the 2 explanatory hypotheses already mentioned, we also add a research question regarding the possible effect of the 2021 census. At least 4 million Romanian citizens were out of the country on the date of the census to which we refer. Some of them probably wondered why they cannot report, via the internet, their data as citizens of the country, even if they have been away for more than a year.

Argumentation related to the fact that temporary emigrants, for over a year, are no longer part of the country's resident population could be an official justification. In 2011, at the penultimate census, it was possible to report your situation through the census form, even if you had been out of the country for more than a year. Did blocking the possibility of not registering personal data for Romanians who left the country for more than a year, in the electronic form of the 2021 census, contribute to accentuating their dissatisfaction with the country's institutions? With such questions related to the census, the decision to obtain another citizenship or to not return to the country of origin was most likely also considered.

Factors explaining return migration abroad seem to be selective by destination country. Urban accessibility, for example, stimulates re-migration not generally – but mainly in the case of Italy as a destination.

The motivational profile of potential emigration from Romania, from the perspective of the Eurobarometer survey used here, is very similar to that recorded in Bulgaria. Especially in these 2 countries, potential emigration is more due to the impact of the shortage/insufficiency of well-paid jobs and social living conditions based on social justice rules.

The extension of analysis to several countries (Table 3, for example) is an attempt to better contextualise Romanian re-migration abroad in the European context. One could see that emigration countries like Romania, Bulgaria and Portugal have similar clear determinants of emigration, especially related to return migration and the younger age of potential emigrants.

Across the European Union, however, we are seeing a significant, strong impact of return migration on potential re-migration (technical details not presented here). It follows that a good percentage of the returnees are not satisfied with the professional and living conditions in their countries of origin or have a higher level of aspirations that they can satisfy, especially through re-migration or circulatory migration. The related details would be worth studying.

It seems that the neighbourhood culture and situations (Romania and Bulgaria, Czech Republic, Poland, Hungary, Italy and Austria, etc.) explain some similarities of the causal profile of intentions to emigrate at the individual level (Table 3). Economic policies that consider that only work and salary matter in both potential and *de facto* emigration do not have a sufficient scientific basis. The institutional determination of potential emigration is extremely important and should be researched periodically, especially in countries such as Romania.

Notes

1. National Institute of Statistics (NIS), Census data 2021 (on request).
2. Eurobarometer 97.4 May–June 2022 ZA No. 7901, available at <https://www.gesis.org/en/eurobarometer-data-service/data-and-documentation/standard-special-eb/study-overview/eurobarometer-974-za7901-may-june-2022>.

Conflict of interest statement

No conflict of interest was reported by the author.

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Annex

Table A1. Emigrants from and immigrants to Romania 2013–2023

International migratory movements reported for Romania	Year of immigration or emigration										
	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Temporary immigrants (Romanian and foreign citizens)	153,646	136,035	132,795	137,455	177,435	172,578	202,422	145,519	194,642	293,024	324,091
Temporary emigrants (Romanian and foreign citizens)	161,755	172,871	194,718	207,578	242,193	231,661	233,736	186,818	216,861	202,311	239,244
Permanent immigrants with Romanian citizenship	23,897	36,644	23,093	27,863	50,199	65,678	64,479	32,250	49,769	54,839	29,830
Permanent emigrants with Romanian citizenship	19,056	11,251	15,235	22,807	23,156	27,229	26,775	21,031	34,341	48,438	48,612

Source: National Institute of Statistics (NIS), TEMPO data basis. These are flow data.

Table A2. R-square change if one uses the 5 blocks of variables from Table 1 as predictors of short-term emigration in linear regression

Model	R-square	Adjusted R-square	Change statistics				
			R-square change	F Change	df1	df2	Sig. F change
1. Local conditions of development	.067	.065	.067	38.817	5	2,722	.000
2. Regional conditions of local development	.132	.128	.066	25.762	8	2,714	.000
3. LHDI local human development index	.133	.129	.001	2.723	1	2,713	.099
4. Rate of returnees by former residence country	.153	.146	.020	7.890	8	2,705	.000
5. Local migration experience	.223	.216	.070	81.298	3	2,702	.000

SPSS results of running hierarchical regression to predict short-term emigration at the community level (2021 census) by 5 categories of predictors. The component predictors for each of the 5 categories are specified in Table 1. Example: if one adds the second bloc of predictors referring to regional conditions of development, R2 increases by 0.066 and this is a significant increase of R2 to predict short-term emigration from local communities.

Table A3. Perceived social justice by type of migration and country of residence

Survey country	Non-migrants (NM)	Non-migrants on the move (NMM)	Stayer returnees (SR)	Returnees on the move (RM)	Total	RM-NM
Romania	11.5	0.6	-2.6	-59.1	8.9	-70.6
Poland	36.8	29.6	-16.4	-25.3	31.8	-62.2
France	-6.6	-22.8	-24.0	-52.5	-11.8	-45.9
Bulgaria	-27.3	-40.9	-26.0	-62.0	-29.9	-34.7
Italy	-7.3	1.0	-39.7	-39.2	-7.7	-31.9
Germany-West	14.0	11.3	30.5	-14.0	14.2	-27.9
Netherlands	-6.2	0.7	6.4	-26.8	-5.2	-20.6
Ireland	42.9	21.8	38.7	25.4	38.2	-17.4
Hungary	-1.7	10.7	-15.0	-15.4	-0.4	-13.8
Lithuania	-8.7	17.8	24.5	-14.4	-3.1	-5.7
Austria	23.0	30.6	39.1	21.4	24.5	-1.6
Finland	37.5	48.9	54.8	45.9	41.9	8.3
Belgium	20.3	29.7	13.4	31.9	21.6	11.7
Czech Republic	-12.5	11.1	8.3	-0.1	-8.5	12.4
Sweden	28.9	56.5	40.8	44.2	35.9	15.3
Latvia	-18.9	-12.6	-37.7	-2.2	-18.4	16.7
Spain	-10.9	-4.3	-6.9	7.0	-9.3	17.9
Slovenia	-42.9	-1.3	-30.7	-24.2	-33.2	18.7
Greece	-60.4	-52.5	-66.5	-35.6	-59.9	24.8
Portugal	-19.7	3.3	-12.5	12.4	-16.4	32.1
Croatia	-41.1	-46.6	-69.9	-6.6	-42.8	34.5
Denmark	38.8	57.5	43.7	77.1	43.3	38.3
Slovakia	-20.4	0.4	-22.2	20.6	-17.3	41.0
Germany-East	-35.6	3.4	3.8	59.8	-29.5	95.4
Total	0.2	2.7	-0.5	-11.4	0.0	-11.6

Source: Eurobarometer 528, 2022. Own computations: DS. The first 5 columns in the table are averages of the social justice satisfaction factor. Example: the average index of social justice of returnees in Romania intending to remigrate is -59, much lower than the average index for the same variable for the case of those that are non-migrants without intention to leave (11.5).

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Sticky Emotions and Homemaking: ‘The Emotional’ Mobilities of Lithuanian Queer Migrants

Artūras Tereškinas* 

By drawing on semi-structured interviews with Lithuanian LGBTQ+ individuals who have relocated to various European countries, this study examines the emotional dimensions that influence both migration decisions and homemaking processes. Utilising the theoretical framework of ‘sticky emotions’ and ‘homemaking’, the article highlights how queer migrants navigate their old and new social environments and invest them with emotions. The findings indicate that migration motivations are often intertwined with personal, affective and emotional dimensions, rooted in resistance to Lithuania’s conservative and heteronormative environment. Additionally, the article underscores the homemaking processes in host countries, where queer migrants encounter diverse queer communities that allow them to express their sexualities more openly. By analysing queer migration narratives, this article contributes to discussions on queer mobility, emphasising the need for detailed ethnographic research on the lived experiences of queer migrants, particularly those from post-socialist Central and Eastern Europe.

Keywords: queer migration, Lithuanian LGBTQ+ migrants, migration motivations, sticky emotions, homemaking

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Introduction

Despite the growing number of studies on migration, research on LGBTQ+¹ migration from Eastern Europe to or within Western Europe remains insufficient (Binnie and Klesse 2013; Mole 2018a, 2021; Novitskaya 2021; Stella, Flynn and Gawlewicz 2018). This research gap makes it more difficult to fully understand the lived experiences, challenges and needs of LGBTQ+ individuals who migrate from Central and Eastern Europe to Western Europe. Many face discrimination and marginalisation in their home countries, yet their migration motivations remain underexplored.

One major shortcoming in existing research is the lack of focus on how emotions influence migration decisions and adaptation processes. Despite the 'affective turn' in social sciences, the specific emotional experiences of queer migrants remain under-researched (di Felicianantonio and Gadelha 2016; Luibhéid 2008). The feelings of alienation, despair, disappointment and longing – particularly in the case of Eastern European queer migrants – require deeper investigation (De Craene 2017). Additionally, the unique forms of discrimination and trauma that LGBTQ+ migrants endure (Alessi, Kahn, Woolner and Horn 2018; Alessi, Kahn, Ast, Cheung, Lee and Kim 2023) and the emotional challenges of integration (Lewis 2018; Mai and King 2009; Mole 2018a, b) demand further attention.

This article addresses these gaps in queer migration research by placing emotions at the core of the analysis. Creatively using Sara Ahmed's concept of 'sticky emotions' (2004, 2010) it analyses how Lithuanian queer migrants explain their motivations for leaving Lithuania and settling down in the host countries. 'Sticky emotions' refer to the way in which emotions can adhere to bodies, objects and social contexts, shaping individuals' behaviours and perceptions. This stickiness means that emotions can be attached to different life decisions and transferred to different social and cultural contexts. The concept is also relevant in understanding how emotions can impact on migration decisions and social adaptation dynamics within different communities. The stickiness of emotions can also affect how individuals relate to their old and new places of residence, creating emotional landscapes that can reinforce or challenge social norms. By recognising this emotional dimension, we can better understand the complexity of migration experiences.

Similarly, the concept of 'homemaking' helps us to analyse how queer migrants create spaces of belonging in their host countries. Thomas Wimark (2021) suggests that queer refugees engage in processes of 'liminal homemaking' by constructing their identities and communities in ways which may diverge from traditional social norms. Homemaking involves a range of personal practices, emotional attachments and social relationships which contribute to the construction of a new home (Boccagni 2022; Brun and Fábos 2015; Pérez Murcia and Boccagni 2022). In the context of protracted displacement, this concept refers to the practices and processes through which individuals create a sense of home despite their uncertain and often precarious circumstances. It can include daily routines, social connections and the reimagining of home through past experiences, present realities and future hopes (Brun and Fábos 2015). The process of homemaking also encompasses the emotional dimension that can illuminate which emotions 'stick' to migrants' experiences in the host countries and how this stickiness persists.

Drawing on semi-structured interviews, this article examines the different emotions that underlie Lithuanian queer individuals' motivations to migrate and their subsequent homemaking processes in the host countries. The most attention is paid to the queer emigres' emotional motivations to migrate, their sexual socialisation and their adaptation in their host countries, subsumed under the concept of homemaking or the reproduction of home. Two key questions about queer men and women in Lithuania guide this study. Firstly, what primary emotions drive Lithuanian queer individuals to migrate and how

do emotional and sexual factors influence these decisions? Secondly, what emotions are tied to the homemaking processes of Lithuanian queer subjects as they adapt to new queer communities?

In answering these questions, I focus on a variety of ‘motivations of individual migrants and the movement of the queer body itself through space’ (Gorman-Murray 2007: 111). I begin the article by briefly reviewing the legal and social situation of LGBTQ+ individuals in Lithuania and the recent literature on queer migration, particularly within Central and Eastern Europe. Subsequently, I describe the methodological framework of the study. In the third part, I analyse the semi-structured interviews in an attempt to show how different emotions underlie Lithuanian queer individuals’ relocation motivations and adaptation processes.

By employing these theoretical concepts, the article contributes to ongoing discussions on queer migration, emphasising the importance of emotional dimensions. This article ultimately aims to deepen our understanding of the experiences of Lithuanian queer migrants by bringing Eastern European perspectives into conversation with dominant Western models of queer migration. Rather than challenging the notion that Western countries offer comparatively better conditions for queer individuals from Eastern Europe, the article complicates decolonial critiques that frame the West solely as an oppressive force (Kulpa 2011; Mole 2018a).

Queer migration from Central and Eastern Europe: Literature review

Research on queer migration has grown significantly in recent years, yet LGBTQ+ migration from Central and Eastern Europe remains an understudied area (Binnie and Klesse 2013; Mole 2018a). This section provides an overview of the existing literature while identifying key gaps that this study aims to address.

Despite the decriminalisation of homosexuality in 1993, Lithuania continues to impose significant legal restrictions on LGBTQ+ rights. Although the Law on Equal Treatment prohibits discrimination based on sexual orientation in employment, education and access to goods and services, legal regulations concerning the recognition of same-sex relationships, gender reassignment, gender identity and the right to privacy remain absent. Efforts to introduce same-sex partnerships and marriage have repeatedly failed, with the Lithuanian Parliament rejecting all proposals (Tereškinas, Kārklīņa and Rodiņa 2022). Additionally, the Law on the Protection of Minors against the Detrimental Effects of Public Information, introduced in 2010, restricted the freedom of LGBTQ+ expression, preventing the dissemination of positive information about LGBTQ+ individuals under the guise of ‘traditional family values’ (Tereškinas 2019; Tereškinas *et al.* 2022). However, in December 2024, Lithuania’s Constitutional Court ruled that the anti-LGBTQ+ provisions of the law were unconstitutional. It stated that showing ‘diverse family models’ is not harmful to minors and emphasised the importance of equality and tolerance. After 15 years, the controversial clause banning gay information for children was abolished (ILGA-Europe 2024).

Lithuania also lacks a gender reassignment law, which makes it difficult for transgender individuals to obtain new identity documents, although the national courts began granting legal gender recognition without requiring gender reassignment surgery in 2017 (ILGA-Europe 2018: 17). Furthermore, societal attitudes towards LGBTQ+ people remain largely hostile, with hate speech and discrimination against LGBTQ+ individuals still widespread (Lithuanian Gay League 2019). Ultranationalist rhetoric portrays LGBTQ+ individuals as a threat to traditional family structures and national identity, while neoconservative NGOs and Parliament members disseminate radical conspiracy theories, framing

LGBTQ+ activism as an attack on Lithuania's cultural and moral values (Kamarauskaitė 2024; Tereškinas *et al.* 2022).

Despite the precarious legal and social situation for LGBTQ+ individuals in Lithuania, there is a shortage of research on how this impacts on LGBTQ+ emigration from the country. LGBTQ+ individuals are largely absent in the broader migration trends from Lithuania (Brzozowski, Wojno, Ćwiklicki and Chwat 2023; Vaidelytė, Butkevičienė and Vaičiūnienė 2024), although research from other Central and Eastern European countries shows that LGBTQ+ individuals migrate to more 'tolerant' regions due to the continuous stigma and legal discrimination in their home countries (Mole 2021; Stella and Flynn 2019).

Queer migration has been conceptualised as an embodied, situated and relational movement involving a variety of trajectories and complex push factors (Gorman-Murray 2007, 2009). A growing body of literature on the intersection of migration, sexuality and queer studies (Luibhéid and Cantú 2005; Manalansan IV 2006, 2018; Mole 2021) demonstrates how LGBTQ+ individuals challenge traditional understandings of migration, while migration, in turn, influences their sexual and gender experiences (Mole 2021: 2–3). Queer or sexual migration is often characterised as LGBTQ+ people's migration driven by sexual desires and pleasures, the pursuit of romantic relationships, the need to explore new self-definitions of sexual identity, the desire to distance oneself from experiences of discrimination caused by sexual difference or the search for greater sexual equality and rights (Carrillo 2020: 4).

The research indicates that the primary motivations for LGBTQ+ individuals to leave Lithuania include the desire for safety, acceptance and better living conditions (Klūsener, Stankūnienė, Grigoriev and Jasilionis 2015). Economic factors such as unemployment and low wages also play a significant role in the decision to migrate, as many LGBTQ+ individuals face additional barriers in the job market due to their sexual orientation or gender identity (Žukauskienė, Zulumskytė and Ozbinaitė 2022). Some migrate to explore new sexual experiences, either with new partners or in a more accepting cultural environment. Thus, sexuality can significantly shape migration decisions (Binnie and Klesse 2013; Mole 2021; Novitskaya 2021; Stella and Flynn 2019; Stella *et al.* 2018).

Homophobic and transphobic laws, coupled with societal stigma, are major drivers of queer migration (Ayoub and Paternotte 2014; Stella 2015). Western Europe is often seen as a desirable destination due to its more progressive LGBTQ+ rights, legal protections and inclusive communities (Binnie and Klesse 2013). However, some studies on queer migration show that LGBTQ+ migrants in Europe still experience complex discrimination based on sexual orientation, gender identity, race and immigration status. Queer asylum-seekers, in particular, face heightened vulnerability, including homophobic and transphobic violence (Giametta 2017). According to other studies, migration policies, rather than offering protection, often reinforce systemic exclusion and marginalisation (Shakhsari 2014).

Some research explores how queer migrants negotiate their identities and sense of belonging in both their home and host countries. Many experience a sense of displacement, as they are often excluded from both mainstream migrant communities and local LGBTQ+ networks (Stella 2015). Post-socialist transitions have influenced LGBTQ+ rights and societal attitudes, making them a focal point in queer migration research (Mole 2020). Supportive communities and social networks play a crucial role in helping LGBTQ+ migrants to integrate and to emotionally navigate their new environments (Golembe, Leyendecker, Maalej, Gundlach and Busch 2021).

As previously mentioned, queer migrants often face continued engagement with heteronormative nation-states that shape their identities and experiences by marginalising them (Luibhéid 2008). This is the reason why 'queer migration often becomes synonymous with leaving an unsupportive or unsafe

place to disclose their true, already formed queer identity in a more appropriate, inclusive place characterised by a large queer community and less restrictive sexual and cultural norms' (Lewis 2012: 212). LGBTQ+ migrants search for places which they think of as more tolerant and accepting. Seeking to escape discrimination, they move in pursuit of spaces that they imagine will be safer and more liberal, where they can live and express their identities without fear of violence or social ostracism (Adur 2018). This model of migration suggests that queer individuals move from restrictive environments to more open-minded ones. Although some scholars criticise this binary model (Di Felicianantonio and Gadelha 2016), empirical research on Central and Eastern European migrants confirms its continued relevance (Mole 2021; Stella *et al.* 2018). Queer migrants sometimes view their destination countries as utopian places offering a better future and the freedom to express their sexuality.

It is worth noting that, despite legal challenges and hostile societal attitudes, Lithuanian queer citizens enjoy the right to free movement within the European Union. This means that they do not have to face the legal barriers and restrictions that most non-European migrants encounter when they attempt to travel to or settle in the EU. This is a significant advantage for Lithuanian queer citizens who wish to move, work or study in other EU countries, as they can do so without having to navigate complex visa processes or deal with discriminatory immigration policies. Additionally, this right to free movement allows them to fully exercise their rights as EU citizens, including the right to live and work in any member state, as well as access to social benefits and protections (Bryer, Rauleckas, Muraleedharan, Butkevičienė, Vaičiūnienė, Vaidelytė and Miežanskienė 2020; Vaidelytė *et al.* 2024).

While the existing studies address the broader sociopolitical factors behind queer migration, there is limited research on how Eastern European queer migrants emotionally navigate their relocation experiences – firstly how they detach from the negative emotions tied to their home countries and emotionally reconstruct a sense of belonging in their host countries. Lithuanian LGBTQ+ migrants' homemaking experiences, i.e., finding LGBTQ+ inclusive spaces, developing new emotional and sexual self-perceptions and negotiating between old and new emotional attachments to their home and host countries, remain underexplored. This study aims to address these critical research gaps.

Methodology

The research used in this article was part of a broader study on queer migration from and to Lithuania. The aim of the study was to examine the migration motives of emigrating and immigrating queer individuals and to understand how migration is related to the enactment of gender identities, LGBTQ+ communities, culture, politics and religion. Additionally, the study sought to understand how sexuality structures most international migration processes and experiences. Between May and October of 2023, 29 semi-structured interviews were conducted with LGBTQ+ individuals who emigrated to various European countries, LGBTQ+ individuals seeking asylum in Lithuania and officials from Lithuanian state and municipal institutions involved in migration and social integration policies.

For this article, 9 semi-structured interviews with LGBTQ+ emigrants were analysed. These interviews ranged from 50 minutes to 1 hour and 48 minutes, with an average length of 1 hour. The interviews were conducted either remotely via Zoom or in person. The interview guidelines consisted of 6 question blocks covering sociodemographic data, sexual identity, emigration motives, adaptation and integration into a new country, the relation between sexual and religious identities and possibilities of return. After transcribing the digital audiotapes of the interviews *verbatim*, the researchers reviewed the transcripts for accuracy and summarised the key points for each interview. The interviews were

then coded – i.e., they were assigned relevant codes such as emotions, sexuality, migration decisions and adaptation to a host country.

Simple random sampling (Staller 2021) was used to select queer migrants. The sample consisted of 9 participants, including 7 men and 2 women. These individuals, aged between 29 and 43, resided in different European countries, including the UK, Sweden, Denmark and France. All informants identified as gay, lesbian and queer (some defined the latter identification as a cultural and, sometimes, as a subcultural category). All of them had a university education.

The theoretical saturation principle was applied to determine the appropriate sample size. This principle suggests that the researcher should continue collecting data until no new information is generated from the interviews (O'Reilly and Parker 2013). Despite the small research sample, the richness of the narrative data, thematic consistency and recurrence of shared experiences among participants support the adequacy of the sample. However, it is crucial to acknowledge that a more extensive and diverse sample, including non-binary, bisexual and transgender individuals, would enhance the study's generalisability. Future research could expand on this by incorporating a broader range of sexual identities.

The researchers addressed the ethical concerns of the research by ensuring the confidentiality and safety of the interviewees. Confidentiality commitment was explained during the informed consent process, which was conducted with each informant before they participated in the study. The study's objectives, methods and potential risks and benefits of participation were explained in this process. It was made clear that participation was voluntary and that the informant could withdraw from the study at any time without any consequences. During the interviews, researchers took particular care to ensure the anonymity of our informants. They did not use their real names in any part of the study and avoided asking any specific questions that could potentially identify them. They also ensured that all data collected during the interviews were securely stored and kept confidential. To further protect the privacy and confidentiality of the informants, their names were changed in the article.

The article employs theory-guided qualitative content analysis (Kuckartz and Rädiker 2023) to examine the research participants' migration experiences and emotional attachments. Dominant themes were identified in the interview transcripts and the views of the interviewees concerning their emotional experiences in migrating and adapting to new countries were analysed in relation to the concepts of 'sticky emotions' and 'homemaking'. This methodology enabled me to understand migrants' desires, affects and emotions related to their mobilities.

While the study provides valuable insights into the sexual, emotional and affective dimensions of queer migration, it is essential to acknowledge its limitations, including the sample size, geographical scope and lack of a longitudinal approach. The study primarily focuses on gay and lesbian individuals, with limited representation of bisexual, transgender and non-binary perspectives. It did not analyse intra-regional migrations within Central and Eastern Europe. A longitudinal approach focusing on the impact of emotions across different life stages would contribute to a more nuanced understanding of queer migration and its emotional complexities.

Findings: Migrating subjects, migrant subjectivities

In this part, I examine how different emotions affect queer migration, focusing on both the research participants' decision to leave and their sexual resocialisation and adaptation in new countries and queer communities that I call 'homemaking' or the reproduction of home. By analysing Lithuanian queer individuals' experiences through the perspective of sticky emotions and homemaking, I answer the

following questions: What emotions motivate Lithuanian queer individuals to leave their home country and not return? What emotional experiences continue to influence their homemaking process or sexual socialisation and adaptation to host countries?

As mentioned before, all the informants identified as gay or lesbian and queer. One female informant avoided classifying herself, although she had been in a long-term relationship with a woman. Another female informant fluctuated between the definitions of bisexual and lesbian but finally chose the latter because of her romantic involvement with another woman. The distinction between gay and queer was often explained as a distinction between the sexual and political/subcultural identifications: 'Of course, I identify with the gay community. Considering the subculture, I am queer. I will also identify myself politically as queer since I have a quite progressive leftist mindset' (Dominykas, London).

Sticky emotions and motives in queer migration

The decision to leave Lithuania and the refusal to return are deeply intertwined with emotions that 'stick' to Lithuanian migrants' experiences. Ahmed's (2004) concept of 'sticky emotions', which describes how emotions accumulate around certain bodies and spaces, helps us to understand these migration motivations. Emotions do not simply reside in individuals but circulate between bodies and social spaces, attaching to specific subjects and reinforcing their affective experiences of belonging or exclusion. In this way, Lithuania, for many research participants, was not just a homeland but also a place associated with such negative emotions as fear, discomfort and shame.

For some, the desire to leave was articulated in terms of academic or professional aspirations. Some informants left the country, after completing high school, to study abroad, while others departed at just 17 years old. They explained their decision as a desire to 'study and live in a country which is relatively acceptable to them and has good universities' (Dominykas, London). One informant also left after high school. He studied and worked in several countries in Western Europe and, at the time of the interview, was a doctoral student in London. He argued that the primary motivation to leave Lithuania was his studies or, in more general terms, career possibilities (Tomas, London).

Yet beneath these reasons lies a more profound emotional unease tied to the perception of Lithuania as 'small and claustrophobic'. Dominykas, for instance, described his decision to study in London as a pragmatic choice but, later, acknowledged that his queer identity became an essential factor in his decision not to return: 'One of the reasons was definitely related to my identity – as a queer person. I think that eventually, I came to understand that I never wanted to return to Lithuania, probably... It just feels too small, unsafe and too conservative on almost all issues. I don't feel respected there' (Dominykas, London). Another informant presented a similar argument: 'Leaving has significantly contributed to my understanding of my identity. I didn't initially consider it as a factor in my decision to leave but I now see my sexuality as one of the key elements influencing whether I return to Lithuania or not. It's more important to me now than when I left' (Tomas, London). The emotional weight of feeling unsafe and unrecognised as a queer person made informants feel uncomfortable and always out of place.

Other informants, like Aušra, explicitly associated their migration with the promise of emotional comfort elsewhere. Aušra left at the age of 17 and travelled extensively, residing in cities such as New York, Milan, Tokyo, London, Barcelona and Paris before eventually making Copenhagen her permanent home. She enjoyed 'the size and human scale of Copenhagen, as well as the fact that many things [were] adapted to people...' In her words, 'All social guarantees for people [were] more developed and this [was] felt in the general atmosphere of the city'. In Copenhagen, she found an atmosphere where the legal and social acceptance of LGBTQ+ individuals allowed her to experience what she called 'inner

comfort': 'Without a doubt, the opportunity to live in a country where same-sex marriage is recognised was very appealing. There, it's simply not even a question anymore – people don't dwell on it or overthink it... And that truly brings a great deal of inner comfort!' The absence of this comfort in Lithuania was not simply an individual feeling but a collective affective environment, where institutions, families and everyday encounters reinforced her sense of 'not belonging'. The repetition of exclusionary gestures – legal exclusions, emotional violence and anti-LGBTQ+ rhetoric – made this informant feel 'out of place'. Her pronouncement echoes Ahmed's notion (2004) of how specific spaces and places compel some individuals to move away from them.

Rytis' story demonstrates how migration itself becomes an affective project, a way of disentangling oneself from challenging emotional environments. He described his decision to move to Paris as 'the bravest step of [his] life', driven by a need to escape a 'gloomy emotional state' caused by his inability 'to realise [himself] as a homosexual man'. This inability led to what he referred to as 'frequent fluctuations in [his] mood', revealing how queer existence in Lithuania was often marked by emotional unease, precarity and exhaustion. In contrast, emigration to France offered him the possibility of 'inner freedom' – an affective transformation – that allowed him to reimagine himself in a place where queer individuals were treated without hostility.

Even those who left for career-related reasons, such as Vytautas (Brussels), acknowledged that emotional factors were interwoven with their migration decisions:

After finishing my political science studies, I looked to Belgium. Probably, the most job opportunities are here... Of course, the competition was also high but I really aimed to gain professional experience. Naturally, if you look deeper, it's clear that it was vital for me to feel free, for example, in terms of sexual identity – not to have to be afraid and hide. So that was also a factor.

He emphasised that, beyond job opportunities in Belgium, expressing his sexuality freely was crucial. The fear of having to hide and of constantly being in a closet was too heavy an emotional burden in Lithuania.

Another informant mentioned the limited LGBTQ+ community in Vilnius, Lithuania's capital. Even Grindr (a gay dating app) had few gay or queer men to connect with, which was a significant difference from London: 'This weekend in London, I'm going to two raves that are exclusively queer. There are hundreds of similar events there... I invite my friends to go but they say they will go to another gay rave'. He also pointed to the LGBTQ+ Lithuanians' unwillingness to be open and participate in their community: 'Many people are not out or they are out but they completely do not want to be part of the LGBT community. To me, this also seems like internalised homophobia. They say, "Oh, my sexual orientation is not my identity. It is just with whom I sleep"' (Dominykas, London). Dominykas' story demonstrates that emotional geographies of queer migration are also shaped by the absence of a sustainable queer community and broader possibilities of sexual intimacy. This informant highlighted how Lithuania's queer scene felt suffocatingly small and the lack of visibility of queer people strengthened his feeling of isolation. The lack of emotional and social networks in Lithuania made queer life not only lonely but also precarious. Similarly, negative public discourse, particularly anti-LGBTQ+ speech, acted as an affective barrier to staying in Lithuania. Rytis (Paris) spoke of how simply reading the comments under articles about LGBTQ+ issues in Lithuanian made him feel depressed:

[Negative] comments and the strictly negative attitudes towards LGBT individuals affect me very negatively because they drag me back to my past and to how I felt 13 years ago. Although the situation

has relatively improved in Lithuania, it is still impossible to get married... It is also impossible to walk down the street holding hands. Of course, you can risk doing it but it is a considerable risk.

As some informants pointed out, it is unfortunate that homophobia and anti-gay speech were still prevalent in Lithuania, which fell behind many European countries in terms of legal protections for LGBTQ+ people. Same-sex couples are not provided with legal partnership or marriage and negative attitudes toward LGBTQ+ individuals remain high (Tereškinas *et al.* 2022). While some believed that progress toward greater equality for the LGBTQ+ community was inevitable, others felt that waiting for such change was a waste of time and chose to leave their home country (or not to return) due to their sexuality. However, for many, the possibility of return was tied to an unattainable future rather than a realistic prospect. Rytis, having relinquished his Lithuanian citizenship in favour of French nationality, described his return as imaginable only in 'a hundred years', when radical changes might have occurred:

Well, I don't plan to move back to Lithuania. If I were planning to, there would need to be a law allowing same-sex marriage. There would also need to be a law passed for dual citizenship. Having adopted French nationality, I lost my Lithuanian citizenship because I was forced to do so and had no other option... If I wanted to return to Lithuania, it would require radical changes, which realistically are impossible... Maybe I could return to such a Lithuania as it might be in 100 years... (Rytis, Paris).

His and other informants' words reflect how their decision not to return to Lithuania depends both on legal and social changes and an affective environment hospitable to LGBTQ+ individuals.

Some informants, like Saulė, made migration decisions based on the well-being of their families. Raising a child in Lithuania as a same-sex couple meant constant stress and uneasiness. Saulė described the growing discomfort in school, where children and parents were confused and angered by the idea of a child having two mothers:

One of the reasons was homophobia and the fact that the child was growing up. I think it was becoming more complicated in school as time went on. We didn't hide much in primary school, as it was the same building – kindergarden and primary school. Everyone knew us there... The kids were a bit confused. I mean, how does this child have two mums? I don't understand, they would say. On the other hand, the parents were very distant and somewhat angry.

The emotional labour of constantly explaining and defending her family's legitimacy became untenable, leading her to emigrate to Sweden, where same-sex families were accepted.

Some informants decided to leave their home country due to romantic relationships. For example, 39-year-old Linas emigrated to Sweden because he found a romantic partner there. He compared living in Sweden to residing in Lithuania, stating that one needed to have solid nerves or create a social circle to live a good life in Lithuania. In Sweden, life was much more straightforward, as one could have a routine, mundane and domestic life. He felt happy and content living in a society where being an LGBTQ+ individual was normalised.

Queer people often associate mobility, relocation and travel with their coming-out processes (Binnie 2004; Carrillo 2020). This association can be transformed into an essential part of their life stories and self-narratives. Migration and movement can provide opportunities for queer individuals to explore their sexuality and gender identity safely, without being constrained by their previous social environment. Moreover, queer individuals hope that moving to their destination countries will offer

them a sense of belonging and community and will allow them to form new sexual, romantic and social relationships.

The research participants' stories and narratives often centred around the impact of movement and migration on their identity, relationships and experiences. This is particularly evident in the case of Rytis, who came out to his family while he was in Paris. Coming out was a continuous process for him and, like others, it progressed further when he immigrated to Paris. However, this process was accompanied by satisfaction and emotional stability: 'I have a certain inner freedom, the right to say what I think and how I think. Simply, inner freedom gives a lot and I think it is the most important!'

As the participants' stories show, migration is not just a movement across geographical borders but is also a way of shedding sticky negative emotions such as fear, shame and discomfort and finding a place of residence with less negativity and social friction. In Dominykas' opinion, in Lithuania you constantly experience 'a feeling that no one understands you because you can't tell anything to anyone. Thinking that you will never be normal and won't have those normal things that everyone has. And now I think, thank God, I don't have all those normal things because I really don't want them'. His words reflect resistance to the normality and normativity of negative emotions that Lithuania imposes on queer lives, reinforcing the idea that migration helps LGBTQ+ individuals to escape the emotional burdens that 'stick' to their bodies.

Finally, the stories of Lithuanian queer migrants illustrate how emotions affect not only the decision to leave but also the refusal to return. In leaving Lithuania, the informants attempted to escape the stickiness of negative emotions that made their lives difficult and burdensome. Their new homes offered them different affective possibilities, where queer lives were not sites of social struggle but of emotional fulfilment.

Queer homemaking and sticky emotions in migrant adaptation

All informants described their new homes as more inclusive, diverse and safer compared to Lithuania. For instance Dominykas, from London, noted: '...in my neighbourhood, white people are a minority. I always feel safe everywhere and I can dress as I want. Even the city [of London] is incredibly queer! I really liked these things and decided to stay'. Similarly Aušra, from Copenhagen, mentioned that she always noticed multi-racial and diverse same-sex couples everywhere in the city, from the street to art museums. In her view, this attested to the acceptance of LGBTQ+ individuals and other aspects of social diversity in her new country. These observations highlight how the process of 'homemaking' – creating a sense of belonging in a new environment – is intertwined with the acceptance and recognition of queer identities. As Wimark (2021) argues in writing about queer refugees, queer homemaking is a continuous negotiation, an attempt to find spaces where they can feel safe and express their identities more freely.

The narratives of Lithuanian queer migrants reveal distinct patterns of homemaking or the reproduction of home related to sexual socialisation and adaptation. First, in their new countries, these individuals encountered a trend towards more fluid sexual and gender identities, which allowed them to experiment with different forms of appearance, self-presentation and intimacy. For example, Dominykas (London) reflected on how his new location helped him to queer his sexual and gender identity:

Of course, I have become much more gay and queer. I'm not afraid to experiment with my appearance and express myself how I want. I enjoy attending parties where everyone is gay because I can dress how

I like and express myself freely, such as painting my nails and wearing makeup. Looking back, I've definitely undergone a significant transformation...

This transformation can be understood as part of the homemaking process that enables queer migrants to actively create spaces and identities that feel authentic and liberating. It could be argued that the relocation process was 'also about testing, exploring and experimenting with alternative ways of being, in contexts that [were] unencumbered by the expectations of tight-knit family, kinship or community relationships' (Knopp 2004: 123).

For many informants, the ability to freely experiment with sexual intimacies was a critical part of their homemaking process. The participants suggested that they felt 'out of place' in Lithuania and that moving to a different country made them feel more at ease with the environment. Sexual experimentation and the exploration of same-sex intimacies became not only incentives but also an outcome of queer migration. Rytis, from Paris, highlighted the importance of sexual freedom in his new country: 'First of all, in France, you can freely talk about sex. Well, I can't imagine such an attitude in Lithuania... Yes, in France, you can freely talk about sex, especially with the person you are in a relationship with... I could say that, for the French, sex is an essential part of life'. Rytis' words indicate how discomfort and self-censorship have been attached to Lithuania, shaping his past experiences. Migration did not automatically erase these affective attachments but Paris offered an opportunity to detach from these negative emotions. Similarly, other participants emphasised the personal reinvention that allowed them to perform their sexual identities openly and to experience a sense of comfort and joy in their host countries: 'I feel like I wear more queer-related clothing now and I can dress more queer depending on my mood. If you accepted me like this – both queer and a migrant – then I won't hide those parts of myself... I can be who I am' (Saulė, Uppsala).

The presence of diverse LGBTQ+ spaces in their new countries played a crucial role in the homemaking process for Lithuanian queer migrants. Dominykas described the vibrant queer scene in London:

In London, there is a specific environment not only based on laws but also on a sense of community, which is very radical and queer. For example, there is even something called Corporate Pride, which is essentially quite dull, and all the punks go there. Then, a week later, there is Trans Pride and, after another week, there is Black Pride – but these delve into other issues. There are also various raves, communities, gay rugby teams, lesbian football teams, nightclubs, bars... So, there are really many places and opportunities to gather.

These varied communities and spaces aided the Lithuanian queer migrants in their homemaking process by creating new emotional ties and affiliations. In leaving behind their home countries, the informants created the opportunity to explore new horizons and experience new things. The desire to experiment with their sexual identities, practices and ways of being queer often led the participants to search for communities where they could feel a sense of belonging and acceptance. Such communities provided a safe space for them to be their 'true' selves and to engage in activities often disapproved of and condemned in Lithuania. Relocating represented a moment of transition, a time of change and an opportunity to embrace new experiences and challenges.

Despite finding new homes in their host countries, some informants still felt a sense of transnational belonging, living between Lithuania and their new country. Linas, from Malmö, expressed this tension: 'But Lithuania is also my home... I'm just torn between two homes. Both Sweden and Lithuania are my

homes'. Similarly Aušra, from Copenhagen, argued that 'It often feels like there are two homes. There are also some projects in Lithuania. So, you travel to Lithuania, complete the project there and then return here. The border is not so daunting because the flight only takes an hour'. These accounts illustrate how queer migrants navigate and accommodate dual attachments while maintaining flexible and pragmatic relationships with both their home and host countries. Their experiences reflect a dynamic form of homemaking that integrates mobility, belonging and continuity across national boundaries.

As my data demonstrate, the process of homemaking entails certain emotional complexities. The concept of sticky emotions, which attach themselves to specific bodies, objects and spaces, helps to explain these complexities. While Dominykas and Aušra found comfort and safety in the queer-friendly spaces of London and Copenhagen, they also carried with them the residue of their emotional experiences in Lithuania. The emotions of fear and shame still stick to their current lives and persist in new, more accepting environments. Sometimes, it was difficult to articulate whether the newly found sense of safety and comfort was due to leaving Lithuania or simply to becoming a more mature person: 'Over the years, I've felt increasingly safe with myself and more courageous. It's difficult to say whether this is solely because I left Lithuania or if it's simply a result of my maturing' (Tomas, London). In the words of another informant, he became more open after ceasing to experience the oppressive Lithuanian environment filled with gossip and negativity: 'Well, you just become braver... I think I've become more open. Perhaps I just pay less attention to people and their opinions...' (Linus, Malmö). This ambivalence reflects the complex interplay between the sticky negative emotions experienced in Lithuania and new possibilities of belonging and comfort.

The Lithuanian queer migrants' narratives show that homemaking is an affective process shaped by opportunities provided by host countries and sticky negative emotions carried from Lithuania. Therefore, homemaking requires active emotional unlearning and relearning that allows queer individuals to embrace, embody and perform their identities without fear of discrimination and stigmatisation.

Conclusion

This article has examined the migration experiences of Lithuanian queer individuals through the perspectives of 'sticky emotions' (Ahmed 2004) and 'homemaking' (Brun and Fábos 2015; Wimark 2021). By foregrounding emotions in migration studies, it has demonstrated that migration is not only a reaction to structural inequalities but also an emotional response to the persistent feelings of discomfort, fear and shame that 'stick' to their experiences in Lithuania. Most interviewees perceived their childhood home as unfriendly towards LGBTQ+ individuals, perpetuating a heteronormative culture. By leaving their home country, queer migrants sought not only legal and social recognition but also an emotional transformation enabled by their detachment from an oppressive emotional atmosphere. In this sense, their relocation marked a distinct transition between the initial feeling of estrangement – home as not home – and the emergence of a new site of possibility (Fortier 2003). The informants emphasised the sense of acceptance which they felt within diverse queer communities in their chosen home countries – communities which enabled them to express their 'genuine' sexual and emotional selves.

The emotional burdens of shame, invisibility and exclusion have been gradually reshaped through the informants' exposure to their host countries, which offered acceptance, diverse queer communities and expanded possibilities of self-remaking. The research participants' stories demonstrate that negative emotions do not simply disappear upon migration; instead, they are reconfigured through interactions with

new queer communities and spaces that provide emotional comfort and the freedom to explore new ways of being. The host countries, with their more progressive LGBTQ+ rights and inclusive communities, offered Lithuanian queer migrants many opportunities for emotional and sexual resocialisation.

The concept of 'homemaking' reveals how queer migrants construct a sense of belonging in their host countries, often through participation in LGBTQ+ communities, sexual socialisation and personal reinvention. For many, the new homes become spaces in which they can engage in new forms of sexual and social intimacy and build meaningful connections. The presence of diverse LGBTQ+ spaces, such as queer clubs, pride events and supportive social networks, plays an essential role in this homemaking process. However, this process is complex: some migrants experience a sense of transnational belonging, torn between their old and their new homes. This liminal state reflects the ongoing negotiation of belonging that characterises queer migration.

By employing the concepts of 'sticky emotions' and 'homemaking', this article highlights how migration can be conceived of as a process of emotional disentanglement from the home country and emotional attachment to host countries. It expands the scope of queer migration studies by integrating queer experiences from post-socialist Eastern Europe with Western queer migration models, while also complicating decolonial critiques that uniformly depict the West as an oppressive space for non-Western queer migrants. Future research should further explore how the affective dimensions of migration influence LGBTQ+ migrants' adaptation and sexual socialisation processes, particularly within Central and Eastern European contexts. Addressing the emotional dimensions is crucial in developing more nuanced perspectives on queer migration and the lived experiences of those who navigate multiple social and affective challenges in search of a new home.

Note

1. When referring to LGBTQ+ individuals in the article, 'queer' – as an inclusive umbrella term for those whose gender identity and sexual behaviour do not conform to societal norms – is the most often used.

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The Role of the Brexit Referendum and the COVID-19 Pandemic in the Changing Patterns of Hungarian Migration to the United Kingdom

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Although the United Kingdom was the primary destination for Hungarian emigrants in the period following EU accession, since the second half of the 2010s there has been a considerable decline, while the number of Hungarian return migrants from the UK has been higher than ever. Using longitudinal administrative data spanning from 2010 to 2022, this paper investigates whether two historical events, namely the Brexit referendum and the COVID-19 pandemic, have contributed to the observed changes in migration trends and the structural shifts in the composition and patterns of migration that have resulted from them. The results show that the Brexit referendum has had a lasting negative impact on Hungarian emigration to the UK and has significantly encouraged the return of Hungarians. Meanwhile, the temporary shifts in Hungarian migration patterns towards EU Member States caused by the outbreak of the COVID-19 pandemic are not similarly reflected in migration patterns towards the UK. The social base of the post-Brexit emigration gradually broadened. Nevertheless, when compared to EU destination countries, emigrants to the UK are characterised by a younger and more positively selected group in labour-market terms.

Keywords: Brexit, COVID-19, Hungary, United Kingdom, emigration, return migration

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Introduction

Over the past 2 decades, there has been a series of notable shifts in the migration patterns of Hungarians. Following the enlargement of the European Union in 2004, Hungarian emigration reached a peak during the first half of the 2010s. However, during the second half of the decade, emigration numbers declined and return-migration numbers increased. In recent years, a new trend seems to be unfolding, with emigration numbers rising again (Hungarian Central Statistical Office 2024). In addition to the changes in trends, the structure of Hungarian emigration has also undergone a significant transformation. Germany and, in particular, Austria, have become increasingly dominant, while the United Kingdom has lost its significance as a destination (Ligeti 2023).

Two significant historical events have had a considerable impact on migration flows between the UK and Hungary during this period: the Brexit referendum and the onset of the COVID-19 pandemic. Following a referendum held on 23 June 2016, the United Kingdom formally withdrew from the European Union on 31 January 2020, resulting in a significant alteration to the regulations that govern the immigration and residence status of EU citizens within the country. Almost at the same time, the unprecedented disruption of daily life caused by the eruption of the COVID-19 pandemic brought about significant but temporary changes in people's geographical movements.

Focusing on the United Kingdom, the most important destination for Hungarian emigrants of the early 2010s, the present study seeks to answer the following research questions:

RQ1: How has the structure and social composition of Hungarian emigration and return migration to and from the UK changed in recent years?

RQ2: To what degree did the Brexit referendum and the COVID-19 pandemic respectively influence these processes?

To assess the impact of the Brexit referendum and the COVID-19 pandemic on Hungarian emigration and return-migration flows, Autoregressive Integrated Moving Average (ARIMA) time-series models were used to forecast the expected migration trends that would have occurred in the absence of these 2 events.

Literature review

Following Hungary's accession to the European Union in 2004, the emigration of Hungarians commenced at a relatively late stage in comparison to other countries in the region and it has never reached the level of emigration rates from a variety of other Central and Eastern European countries, such as Romania or Poland (Hárs 2016, 2020). Since only 3 of the old Member States – the United Kingdom, Ireland and Sweden – did not utilise the temporary labour-market restrictions of up to 7 years following the 2004 Eastern enlargement, the United Kingdom became the primary destination for Hungarians emigrating during the first years of the decade (Blaskó and Gödri 2016). A notable surge in emigration occurred following the 2008 global economic crisis (Egedy 2012) and after the full removal of labour-market restrictions in 2011 (Moreh 2014).

In the years following EU accession, emigration to the UK was characterised by a strong positive socio-economic selection. Emigrants to the UK were found to be significantly younger, more highly educated and predominantly urban. This phenomenon has been observed in relation not only to the population of Hungary but also to other emigrants (Blaskó and Gödri 2014, 2016; Blaskó, Ligeti and Sik 2014; Hárs 2016).

Migration processes in the Eastern European region have traditionally been characterised by long-term, even life-long, outflows due to economic differences across the continent. However, the changing migration context in the 2010s has brought about an emergence of temporary work and – after longer or shorter stays abroad – of onward and return migration. In addition to changes in the general context and conditions – primarily linked to globalisation processes, such as the increasing affordability and speed of transport, communication and information flows (Czaika and de Haas 2014) – migration has also been influenced by region-specific circumstances. The optimal environment of the European Union, with minimal physical and legal barriers, has provided excellent opportunities for the emergence of a mobile group that can quickly change its geographical location in response to socio-political and economic changes (Klimavičiūtė, Parutis, Jonavičienė, Karolak and Wermińska-Wiśnicka 2020). As a result, citizens from Central and Eastern Europe establish and maintain multiple ties with both sending and receiving countries and their migration is often characterised by shorter-distance back-and-forth movements and more diverse, fluid patterns (Engbersen and Snel 2013; de Haas, Castles and Miller 2020; Moskal 2013).

Following a referendum held on 23 June 2016, the United Kingdom formally withdrew from the European Union on 31 January 2020. Before this, the principle of free movement allowed EU citizens to reside and work in the UK without the need for prior authorisation. However, as of 1 January 2021, EU nationals seeking to migrate to the UK became subject to a more-restrictive immigration regime, comparable to that applied to non-EU nationals. Under the new system, newly arriving EU citizens and their family members must apply for a visa in one of three main categories: work, family or study. These new rules do not affect EU citizens and their families who were already residing in the UK before 31 December 2020. Instead, they were required to apply to the EU Settlement Scheme (EUSS) between August 2018 and June 2021 to obtain either pre-settled or settled status (The Migration Observatory 2023).

In the period following the referendum, it was unclear how the UK's migration policy would evolve. Potential scenarios included the continuation of the free-movement regime – with minimal changes – or the introduction of significant restrictions on EU nationals (Gellér-Lukács, Tóttös and Illés 2017; Vargas-Silva 2016). There were also varying expectations and predictions of changing migration trends within Europe. There was a relatively unified scientific consensus that inflows to the UK would probably decline in the longer term (Campos and Timini 2019; Portes 2016). Yet many also expected a temporary surge in migration in the period characterised by post-referendum shock, the interval between the referendum and the entry into force of the new, uncertain rules on entry and residence (Di Iasio and Wahba 2023). Disproving this prognosis, the UK's Office for National Statistics (ONS) estimates that the entries of EU citizens began to decline immediately after the referendum. This is particularly notable for citizens of the EU-8 Member States – countries that joined the Union in 2004¹ (Office for National Statistics 2021). As immigration declined, emigration increased, resulting in a negative migration balance for EU-8 citizens in the UK since 2018 (The Migration Observatory 2023).

The 4-year transitional period after the referendum was characterised by a high degree of uncertainty about the future. During this period, EU nationals residing in the UK were compelled to determine their future course of action, including whether to adopt a wait-and-see approach, pursue a permanent resident status or British citizenship or leave the country – emigrate onwards or return home (Lulle, Moroşanu and King 2018; McGhee, Moreh and Vlachantoni 2017; Moreh, McGhee and Vlachantoni 2020; Stawarz and Witte 2023).

For foreign nationals living in the UK, emotional responses to Brexit have often played a role in their decision to leave. Many individuals reported experiencing a range of emotions, including shock, anger and betrayal following the referendum (Brahic and Lallement 2020; Gawlewicz and Sotkasiira 2020; Guma and Dafydd Jones 2019; Mas Giral 2020). For many, Brexit had a significant negative impact on

the British identity and sense of home and belonging (Guma and Dafydd Jones 2019; Kempny 2022; Miller 2019). Additionally, migrants had to confront the growing anti-immigrant and, at times, xenophobic sentiments generated by the migration discourse that became a central issue during the referendum campaign (Rzepnikowska 2019).

The economic consequences of Brexit have also influenced migration decisions. In general, a negative labour-market outlook in the host country tends to discourage further immigration, while encouraging return migration for those already residing there (Czaika 2015). The economic disparity between the countries of origin and destination is also a significant factor. If the economic difference remains significant following a downturn in the destination country (as has been the case in many Eastern European countries), lower levels of return migration can be expected (Stawarz and Witte 2023). This is further influenced by the length of time spent abroad and the degree of integration. Those who have achieved a high level of integration into the labour market will face greater costs associated with return migration and will be less affected by an economic downturn in the host country (King and Kuschminder 2022; Sjaastad 1962).

The emergence of the COVID-19 pandemic in Europe also had a significant impact on mobility patterns. Firstly, the pandemic and related policies have imposed significant constraints on migration opportunities, with temporary border closures and increased difficulties in border-crossing and travel (e.g. due to mandatory quarantining, testing, vaccination certificates and reduced transport options). Secondly, the pandemic context constituted a crisis in the personal lives of many, bringing about a high level of uncertainty. This encouraged people to be in what they considered the safest environment for themselves, which typically meant closeness to family and friends (Georgiev 2020). This has discouraged further emigration and, for some living abroad, encouraged return migration. Furthermore, in the early days of the COVID-19 pandemic, the issue of international migration was brought to the fore yet again – this time, in relation to the spread of the virus – and anti-immigrant voices appeared to be on the rise once more. This was compounded by the fact that several governments framed the pandemic as an external security threat ‘imported’ by contagious outsiders (Ahmed, Lundahl and Wadensjö 2023; Paul 2020).

In addition to emotional reasons, a number of economic and labour-market factors have encouraged the rapid return of emigrants. Migrants tend to be in a more vulnerable position than the resident population in host countries as their labour-market status, access to social safety nets, financial and housing situations are often more precarious. Therefore, return migration in abruptly changing circumstances has, in some cases, been seen as a necessity rather than a choice (Koroutchev 2021; Martin and Bergmann 2021). The negative economic impact of the pandemic was felt more by those working in more precarious forms of employment, e.g. in temporary or seasonal work, on ‘zero hour contracts’ or in the black or grey economy (Fana, Torrejón Pérez and Fernández-Macías 2020; Lerpold, Sjöberg and Wennberg 2023). Sectors where migrants are typically employed were also particularly affected by the pandemic (Platt and Warwick 2020). A larger number of workers in the tourism and hospitality sectors lost their jobs as a result of the pandemic and most of those in manual labour had no opportunity to switch to home-based forms of work. Since the service and industrial/construction sectors are particularly important for Hungarian emigrants – as will be discussed in more detail later – this may have had a sizeable impact on the return-migration decisions of a larger group. The pandemic is also likely to have had a greater impact on shorter-term and circular movements (Jesline, Romate, Rajkumar and George 2021; Lücke 2020), partly because the increased costs of migration (e.g. more expensive air fares, lost working time due to compulsory quarantine, compulsory and often costly PCR testing) caused by the pandemic were not necessarily recouped in the case of short-term and recurrent circular movements (Lücke 2020). On the other hand, the social and labour-market vulnerability of migrants in host countries decreases with the length of stay abroad and the depth of integration (Ager and Strang 2008).

Data and methods

The following analysis is based on data from 2 administrative sub-systems of the Hungarian National Health Insurance Fund's (NHIF) social-security register. These databases were supplemented by activity and employment indicators based on National Tax and Customs Administration (NTCA) data. The NHIF databases include Hungarian nationals who establish a social-security status in another country for a shorter or longer period of time and individuals who cease to have an official Hungarian address when they move abroad. The databases listed here were provided by the data-owners (NHIF and NTCA) to the Hungarian Central Statistical Office (HCSO) within the framework of the National Statistical Data Collection Programme. The databases have been used by the author – with the consent of the HCSO – for research purposes only. The results of the analysis cannot be used to identify the persons included in the databases.

The official statistics on the emigration and return migration of Hungarian citizens published by the HCSO annually are also based on National Health Insurance Fund administrative data (Hungarian Central Statistical Office 2021). However, due to the differing definitions, subsets used and approaches, the results of the present analysis cannot be compared to the official data in terms of magnitude or trends. It is also important to note that the NHIF registers only provide information on registered migrations and can only be used to produce flow-type data. They are therefore unsuitable for establishing the total number of Hungarian citizens living abroad (stock-type data).

The data used for the analysis include a total of 578,000 registered emigrations between 2010 and 2022, of which 86,000 were to the UK. Some 42 per cent of emigrations ended in return migration, therefore the database also contains 207,000 return events, of which 37,000 were from the UK (see Annex Table 1).

Although it is a legal obligation (Act LXXXIII of 1997; Regulation (EC) No 883/2004) to notify the NHIF of the deactivation and reactivation of national-health insurance when emigrating or returning, it can be assumed that many people do not comply with the obligation to report their movements to official bodies. Various mirror statistics typically register a larger number of Hungarian citizens abroad than the Hungarian authorities register (see, for example, Eurostat 2024; Office for National Statistics 2024). This also suggests that there is an underestimation in the available data. In the absence of data capturing the precise extent of emigration and return migration, including unregistered events, it is not possible to make an accurate estimation of the number of people who left or returned without having officially reported it to the authorities. Furthermore, it is not possible to determine whether this underestimation varies over time and by social group – e.g. whether citizens are getting more used to notifying the authorities and hence the numbers are becoming more accurate or by establishing whether there are demographics in particular that tend to under-report. However, a comparison of different statistical sources suggests that this coverage gap affects different groups of the population in a similar way and is relatively stable over time (Ligeti 2021). Hence, the findings below can be taken as very close estimates, while bearing in mind that they do not cover unreported events that official bodies are unable to detect.

The NHIF data provide a unique opportunity for analysing the emigration and return migration patterns of Hungarians with a longitudinal² approach. This is because they allow the tracing of the migration history of the individuals included in the register, back to 2010. The data over time are also detailed enough to be suitable for applying different definitions of emigration and return migration.

In order to capture the changes of the past decade as accurately as possible and to gain a more-precise understanding of the migration patterns of Hungarians, it was necessary to broaden the official definition³ of migration to encompass a broader range of geographical mobility, including short-term movements (lasting at least 3 months) within the scope of our analysis. This is so that less-straightforward cases, such as circular mobility patterns or movements involving more than 2 states, can also be captured.

In accordance with the extended definition employed in the analysis, the terms ‘migration’ and ‘mobility’ will, from now on, be used synonymously to cover stays abroad of at least 3 months. Individuals registered on the administrative databases utilised for the analysis will be considered as emigrants and/or returnees.

Circular migration is a complex phenomenon that is difficult to measure due to its systemic nature and the different perspectives of sending and receiving countries (Illés and Gellér-Lukács 2022). According to the United Nations’ (UN) official definition, circular migration consists of at least 4 moves and completes at least 2 migration loops that begin and end in the same country (United Nations 2017). Although the official recommendation would require a 10-year period to measure circular migration (United Nations 2017), the narrower time horizon of the subsections in the present comparative analysis does not allow for the use of a 10-year period but only allows for a simplified definition. Therefore, for the purposes of the analysis, those who have lived abroad for at least 3 months at any other time in the 8 years preceding the migration event under consideration will be classified as circular migrants.

In order to quantify the effects of the Brexit referendum and the COVID-19 pandemic on emigration and return-migration flows of Hungarians, Autoregressive Integrated Moving Average (ARIMA) time-series models were employed to forecast the expected migration trends in the absence of the 2 aforementioned events. An ARIMA model comprises 3 components: an autoregressive (AR) model, a moving average (MA) and an integrated (I) element, which capture the long-term, stochastic and short-term trends of a time series (Schaffer, Dobbins and Pearson 2021). To examine the impact of the Brexit referendum on the emigration and return-migration counts of Hungarians, pre-Brexit data from 2010 to 1 July 2016 were utilised to generate UK-specific forecasts for the subsequent period up until 1 January 2020. For the post-Brexit period, the predicted counts were compared with the trends observed. Similarly, the effects of the COVID-19 pandemic were quantified by contrasting forecasted and factual levels of emigration and return migration in 2020–2022, separately for the UK and for EEA countries. In this case, 2010–2019 data were used to produce the forecast for subsequent years, then observed and predicted levels were compared. This analysis was undertaken using the *auto.arima* function from the *forecast* package in R (Hyndman and Khandakar 2008).

To determine the socio-demographic characteristics of Hungarian emigration to the UK, binomial logistic regression models were used. Models were fitted using the *GLM* function of the *stats* package of R. In order to compare these characteristics in different destination countries and in time, Average Marginal Effects (AMEs) were calculated using the *margins* package of R (Leeper 2021).

The demographic variables included in the models are *sex* (male or female), *age* (0–17, 18–24, 25–30, 31–40 or older than 40) and official *marital status* (married or unmarried). Based on the officially registered address recorded in the year of emigration, 2 variables were created: the *type of settlement of residence* (capital, county capital, other cities and smaller towns or villages) and the *type of household* of emigration. The latter indicates whether a given address can be linked to only 1 or to several persons (typically, family) in the database. This allows for the distinction between individuals who emigrated alone and those who emigrated with a household member.

The economic activity and occupation registered in Hungary can be inferred from (1) the basis of entitlement to health insurance as recorded by the NHIF and (2) the NTCA contribution data. Note, however, that there is a significant portion of missing data in this regard (47 per cent). This is partly due to the fact that those who are uninsured (e.g. not employed) and are not otherwise entitled to healthcare services (e.g. not retired, students or on childcare support) but to whom social-security rules nonetheless apply, pay their own healthcare service contributions. For individuals in this category, the NHIF has no information on their economic activity. Although the NTCA has employment data for a wider range of workers, this database is only available for those who paid a contribution between 2015 and 2022.

Seven categories of economic activity have been created. Employed persons were grouped into 3 occupational categories: (1) tertiary and administrative occupations, (2) service-sector workers (e.g. tourism and hospitality) and (3) manual occupations. The economically inactive population is also divided into 3 categories: students, pensioners and other. Students include those on whom data were not available but who were under 18 years of age in the year of emigration. Similarly, those aged 65 or over at the time of emigration were included in the pensioner category. The 'other' category mainly includes those receiving unemployment benefits, disability allowance or childcare allowance. The final category comprises those for whom no further information was available (44 per cent).

The duration of stay abroad was divided into 2 categories: those who had lived abroad for at least 12 months and those who had lived abroad for 3–12 months. For return migrants, the time span was calculated based on the time between emigration and return migration. For emigrants, the time span was calculated on the basis of the time between emigration and the end date of the interval under analysis (31/12/2022).

In addition to the United Kingdom, analyses frequently encompass migration to the countries of the European Economic Area (EEA), which include Iceland, Liechtenstein, Norway and Switzerland as well as the EU-27.

Results

The changing trends of Hungarian migration to the UK

The emigration of Hungarian citizens increased sharply and substantially during the first half of the 2010s and reached its peak in 2016, with almost 60,000 emigrations (Figure 1a). This was followed by a decline, with emigration rates reaching the lowest point in 2020, during the first wave of the COVID-19 pandemic. In that year, the Hungarian authorities recorded around 30,000 emigrations: the lowest number since 2011. In the subsequent 2 years, however, emigration flows started to rise again. At the same time, the number of return migrations increased almost continuously from 2010 onwards and then started to decline after peaking in 2020. In 2020, the number of return migrations exceeded emigrations, making it the only year with a positive migration balance.

Regarding destination countries, there has been a gradual increase in the share of outflows to Austria and a significant decrease in emigration to the UK in the period examined. In 2010, the year prior to the full opening of the EU labour market, a vast segment of emigrants registered in the NHIF database (37 per cent) chose the United Kingdom. This proportion was not reached even by the combined migration rates to the geographically more accessible Austria and Germany (15 and 15 per cent, respectively). Following the full opening of the labour market in 2011, Hungarian migration to Austria and (especially) to Germany increased significantly, while emigration to the UK slowed down. In 2022, only 6 per cent of Hungarian emigrants were bound for the UK, while 40 per cent chose Austria and 25 per cent chose Germany. Based on the data, it can be concluded that the UK is no longer a top destination for Hungarian emigrants. While the UK remains the third most popular destination, it fell significantly behind Germany and Austria and is only slightly ahead of the Netherlands and Switzerland in terms of the share of emigrants from Hungary.

Though the UK's relative popularity (compared to other destination countries) among Hungarian emigrants declined steadily from 2010 onwards, the number of Hungarian emigrants to the UK peaked only a few years later, between 2012 and 2015. Meanwhile, the number of return migrants from the UK

increased gradually until 2016, peaking after a large upsurge, in 2018 (Figure 1d). This is in keeping with broader patterns since, apart from Austria, emigration typically decreased and return migration increased among intra-EU Hungarian migrants in the second half of the decade. However, there are some particularities in the case of the UK. Compared to other destination countries, emigration to the UK began earlier and had already peaked in the first years of the decade. In the context of the subsequent downturn in emigration, the migration balance of Hungarians turned positive, with the number of return migrants leaving the UK exceeding the number of emigrants every year since 2017. It is worth noting that, while the migration balance of the Hungarians for most EEA countries (excluding Austria) has been around zero in recent years, the UK has experienced a strongly positive balance, with a surplus of between 1,000 and 4,000 people per year. Thus, although the UK is no longer a primary destination country, it still has one of the highest numbers of Hungarian nationals returning home (see Figure 1).

Figure 1. Number of outward and return migrations of at least 3 months (Hungarian citizens)



Source: Edited by the author using data from NHIF.

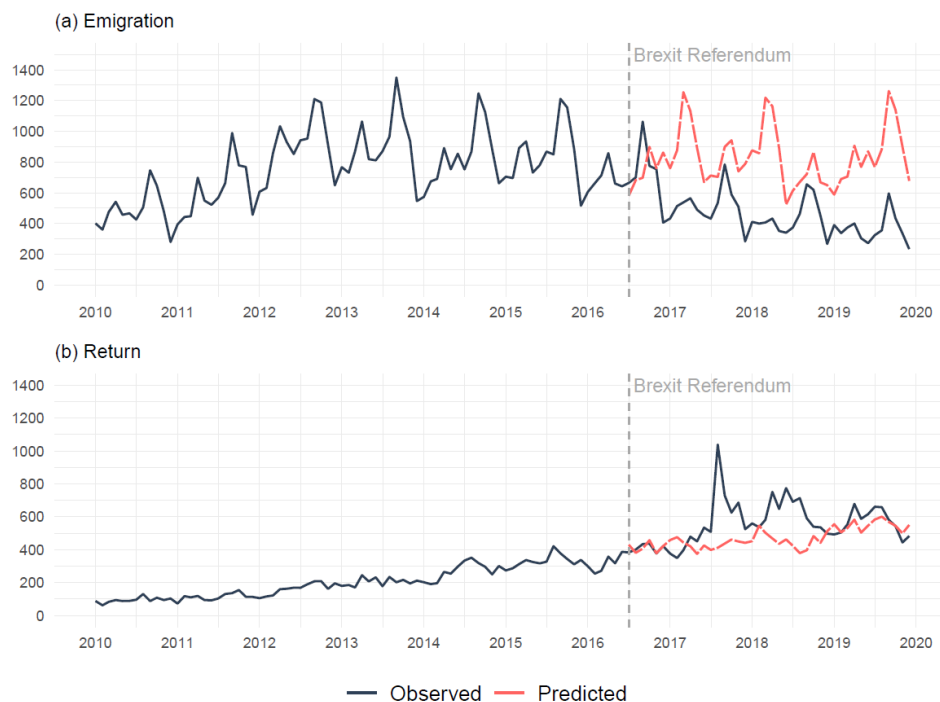
As with the trends in EEA destinations, over the past decade, short-term and circular migration have become increasingly significant between the UK and Hungary. Yet the proportion of short-term movements within the total of UK-bound emigration remained lower than in EEA destination countries. Between 2010 and 2021, the share of one-time short-term movements to Germany increased from 9 per cent to 25 per cent and also increased from 20 to 39 per cent in Austria. In contrast, in 2010, only 7 per cent of Hungarian emigrants to the UK returned within a year, a share which rose at a relatively lesser rate – to only 15 per cent – in 2020, with a slight decrease the following year.

When compared to other destinations, the proportion of circular movements to the UK is much more significant than one-time short-term movements. This, combined with the relatively less significant but still relevant short-term movements, indicates the presence of more 'fluid' forms of mobility between Hungary and the UK. In 2022, over half (55 per cent) of Hungarian emigrants were found to have lived abroad for at least 3 months in the 8-year period prior to the emigration examined. The proportion of circular movements is much higher between Hungary and the UK, with Austria at 36 per cent, Germany at 27 per cent and other EEA countries at 31 per cent. Furthermore, circular movements between Hungary and the UK are typically limited to the sending and the destination country. While a notable 20 per cent of circular chains involve a third country, this is still low compared to the 33 per cent observed in the case of Hungarians' intra-EU circular migration involving third countries besides the main destination.

The effects of the Brexit referendum and the COVID-19 pandemic

In order to quantify the effects of the Brexit referendum and the COVID-19 pandemic on the emigration and return-migration flows of Hungarians, ARIMA time-series models were employed to forecast the expected migration trends in the absence of the 2 aforementioned events.

Figure 2. Observed and predicted monthly (a) emigration flows from Hungary to the United Kingdom; (b) return flows from the United Kingdom to Hungary after the Brexit referendum



Source: Edited by the author using data from NHIF.

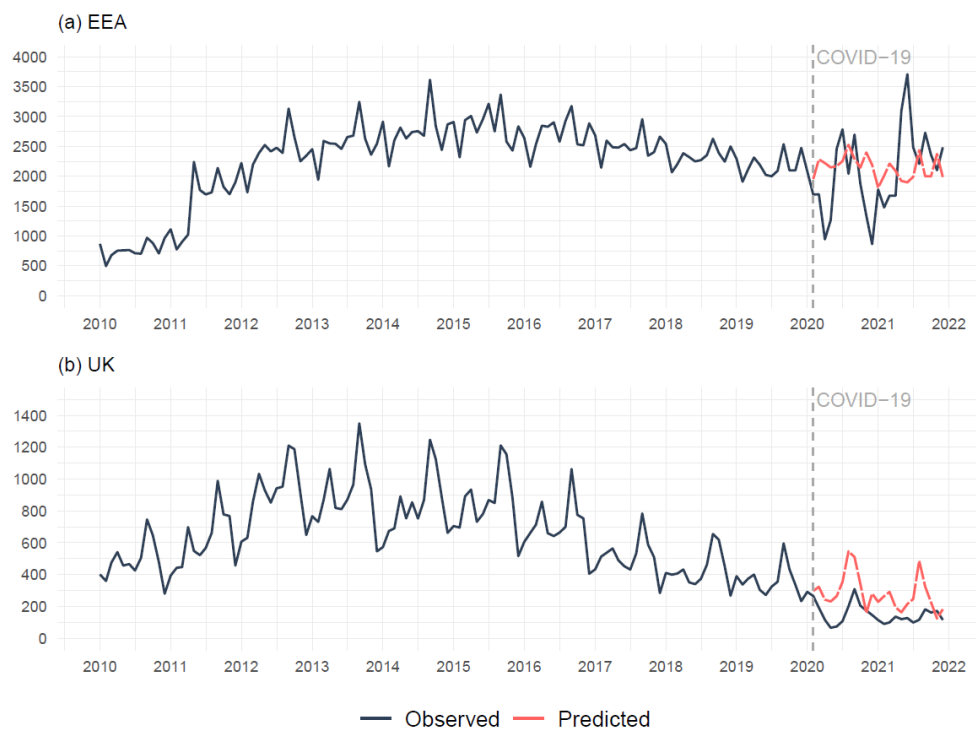
The changing trends in migration to the UK are clearly reflective of the impact of Brexit. While changes are not detectable in the immediate months following the referendum, from December 2016 onwards, observed migration numbers started to fall significantly below predicted levels. The decline was not abrupt, with emigration numbers still showing a steady downward trend over the period.

Furthermore, the seasonal pattern of emigration – which has been observed continuously since the early 2010s – remained prevalent (Figure 2a).

The pattern of return migration differs from that of emigration. Over the course of almost a year following the referendum, no significant change was observed. However, from the summer of 2017, the rate of returns began to increase significantly. In August 2017, returns from the UK reached unprecedented levels, after which the numbers of return migration show wide fluctuation. Two periods stand out where return migration significantly exceeded the predicted levels: from June 2017 to January 2018 and from April to September 2018 (Figure 2b).

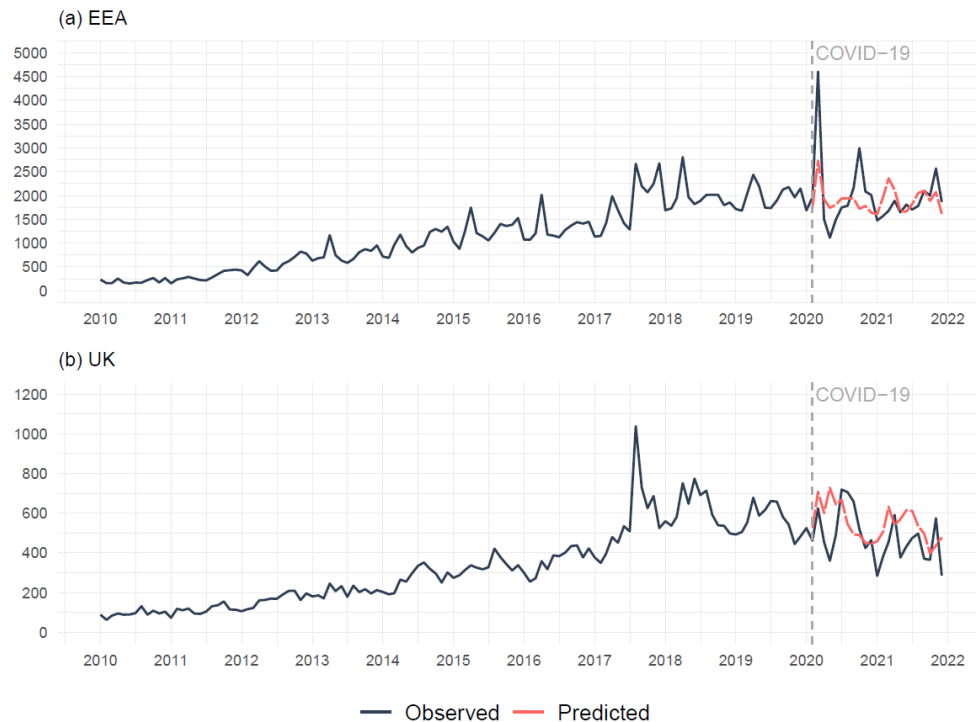
In contrast to the impact of the Brexit referendum, the impact of the COVID-19 pandemic is much less salient in the available data, at least in relation to UK-bound migration patterns. In countries within the EEA, state measures implemented with the aim of containing the epidemic can be well-tracked in the data. Following the outbreak of the pandemic in early 2020, there was an unprecedented surge in return migration, while emigration fell immediately following the first border closures. The impact of government decisions is evident throughout the data in the following months, with a significant drop in movements during the border closures and an increase during the relaxations (Figures 3a and 4a). This was quite different in the UK, where the strong fluctuations observed in EEA countries were not present. The number of Hungarian emigrants to the UK continued to decline after the outbreak and remained somewhat below the values predicted on the basis of the previously declining trends (Figure 3b). With regards to return migration, the impact of the COVID-19 pandemic is virtually invisible (Figure 4b).

Figure 3. Observed and predicted monthly emigration flows (a) from Hungary to the EEA countries; (b) from Hungary to the United Kingdom after the outbreak of the COVID-19 pandemic



Source: Edited by the author using data from NHIF.

Figure 4. Observed and predicted monthly return flows (a) from the EEA countries to Hungary; (b) from the United Kingdom to Hungary after the outbreak of the COVID-19 pandemic

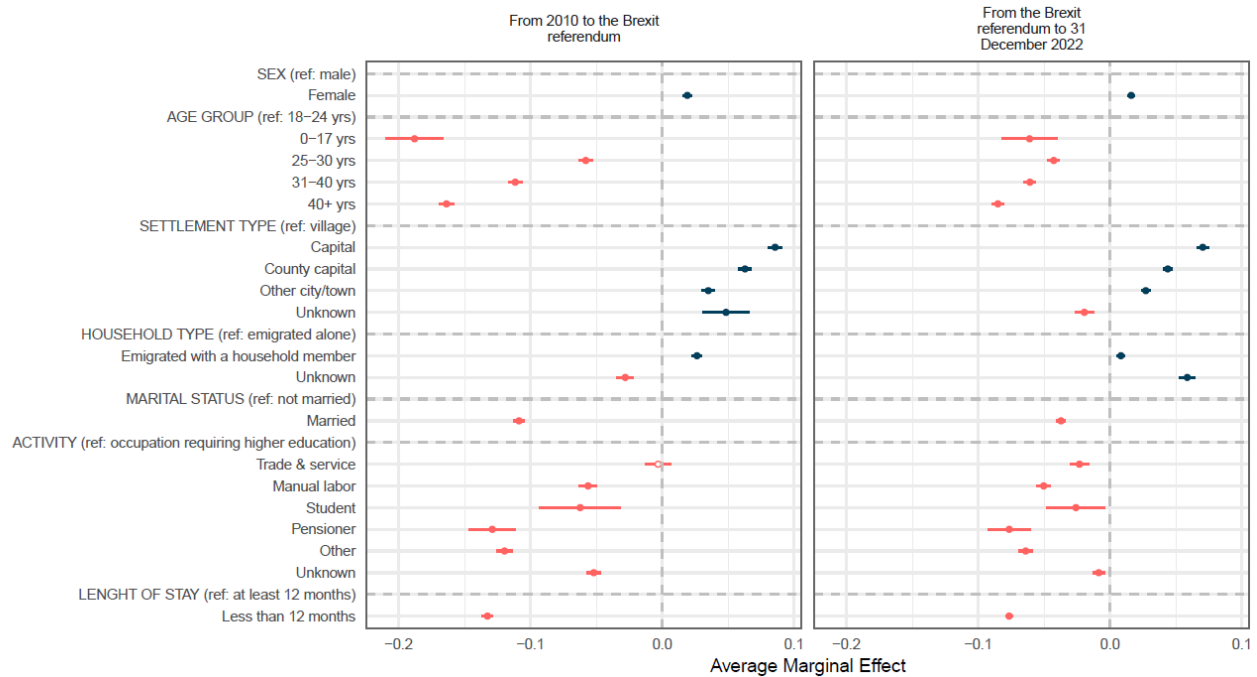


Source: Edited by the author using data from NHIF.

The changing social composition of emigrants to the UK

In both the pre- and the post-Brexit periods the UK, compared to EEA countries, was more likely to be the destination of choice for *women, young people* (particularly those aged 18–24) and immigrants arriving from *cities* (especially the capital) rather than smaller townships in Hungary. In contrast to other EEA destinations, emigration to the UK is strongly employment-led – particularly for white-collar and service-sector workers – while blue-collar workers are more likely to choose other EU countries. While Hungarian migrants to the UK were more likely to migrate with a household member – since children under the age of 18 and married couples were less likely to migrate to the UK than to other EU Member States – this presumably consists not of families with a child/children but, rather, primarily implies the emigration of young couples. An important difference in migrant profiles among the varying destinations is that short-term migrants (staying for fewer than 12 months) were much less likely to choose the UK than other EEA countries (Figure 5).

Figure 5: Factors determining the socio-demographic composition of emigrants to the UK from 2010 to the Brexit referendum (23 June 2016) and from the Brexit referendum to 31 December 2022 (Binomial Logistic Regressions, Average Marginal Effects. Reference group: emigrations to EEA states)

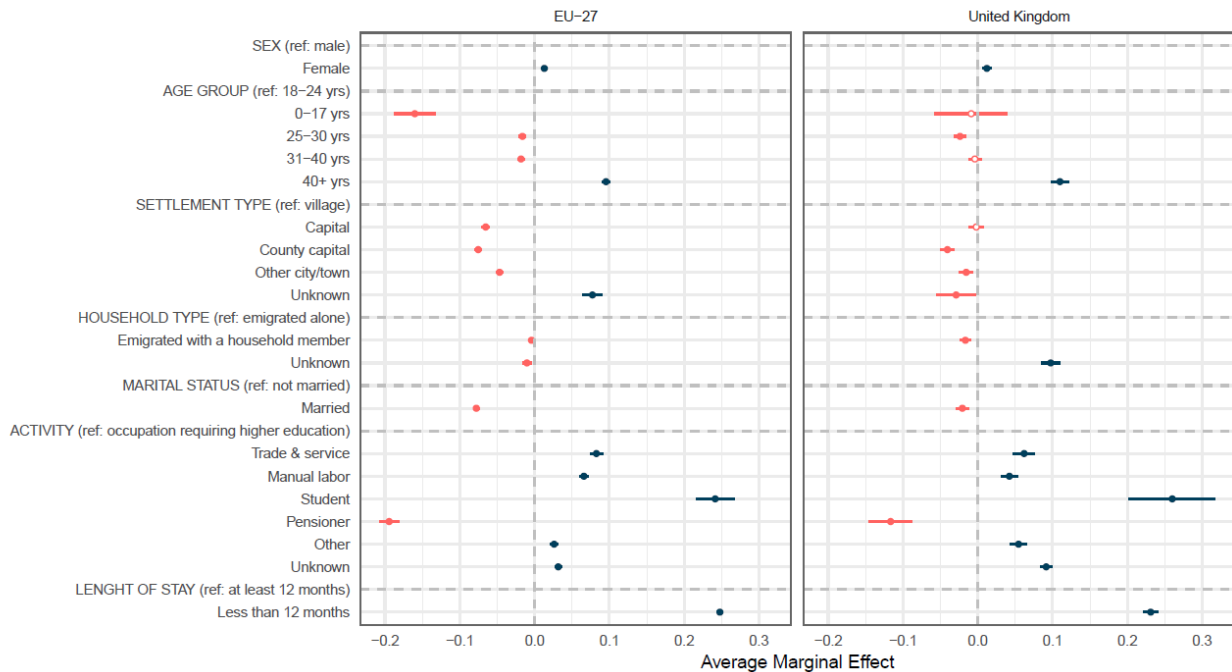


Source: Edited by the author using data from NHIF.

A comparison of the 2 periods reveals that the positive selection advantage for the UK has remained in the post-Brexit period, albeit the differences in the social composition of migrants to the UK and to the EEA countries are gradually diminishing. In recent years, the migration of women and that of the oldest age group (over 40), both to the UK and to the EEA countries, has become more significant compared to the period between 2010 and the Brexit referendum.

Outflows from Hungarian villages have become generally much more significant, yet the UK continues to receive a higher proportion of immigrants coming from the capital (Budapest) and regional capitals. In terms of economic activity, the importance of the service sector and physical labour, as well as the migration of the non-employed, has increased. The most significant difference between the 2 periods under consideration is the aforementioned growing prevalence of short-term movements, which is evident in migration both to the UK and to EEA countries (Figure 6).

Figure 6. Determinants of the socio-demographic composition of emigrants after Brexit compared to the pre-Brexit period for EEA countries and the UK (Binomial Logistic Regressions, Average Marginal Effects. Reference group: emigrants of 2010-2016)



Source: Edited by the author using data from NHIF.

Discussion

Following Hungary's accession to the European Union, the United Kingdom became the primary destination for Hungarian emigrants. However, the high emigration rates observed after the EU accession and at the beginning of the 2010s proved unsustainable. Prior to the EU's enlargement towards the East, Hungary had accumulated a significant migration potential, which was constrained by restrictions on foreign employment. Following the opening of the EU labour market, the hitherto retained potential migrants left the country within a few years. The high emigration rates characterising this initial period could not be sustained in the long term. Consequently, the emigration trend reached its peak in 2016 and emigration began to decline. This was also facilitated by the somewhat decreasing relevance of push factors, such as relative improvements in the Hungarian labour-market environment and high employment rates in Hungary in the second half of the decade (Bakó and Lakatos 2020).

In addition to the general effects mentioned above, the Brexit referendum also contributed significantly to the larger decline in the UK. The number of emigrants bound for the UK started to fall more notably from December 2016 – just a few months after the referendum – and continued to fall until 2020. In spite of 2 major events taking place in 2020 – the entry into force of the legal changes brought about by the Brexit referendum and the outbreak of the COVID-19 pandemic – which may have been expected to have more impact, there were only minor shifts in the number of emigrants from Hungary moving to the UK between 2020 and 2022. This suggests that the referendum itself had the most significant impact on migration choices and emigration numbers, rather than the ensuing legal changes introduced in the following years.

Even though the decline in emigration from Hungary to the UK between 2016 and 2020 was accompanied by a notable increase in return migration, it is important to note that the 2 phenomena are not necessarily linked. Significant return migration can only be expected if there is a sufficient number of individuals already residing abroad – a large enough population from which returning migrants can emerge. Therefore, it can be reasonably assumed that return migration is most probably related to the prior number of Hungarians living abroad – that is, as a consequence of the increase in emigration during the first half of the decade, the number of Hungarian citizens residing in European countries has risen considerably. This was accompanied by a corresponding increase in the number of individuals returning to Hungary in the second half of the decade (Ligeti 2021).

The Brexit referendum also brought about a notable shift in the patterns of return migration, with several pronounced peaks observed in the period following the referendum. This indicates that the referendum did indeed influence the return-migration decisions of Hungarians residing in the UK.

The emergence of the COVID-19 pandemic in 2020 marked a further shift in the migratory patterns of Hungarians. While emigration declined to levels last observed in 2011, return migration reached a peak, resulting in a positive migration balance for that year. However, emigration began to rise again shortly thereafter, while return migration began to decline. The negative economic effects of the pandemic and the postponement of emigration due to border closures undoubtedly contributed to this.

The periodic surge in return migration caused by the pandemic – which was clearly visible in the case of Hungarians returning from EU countries – was barely noticeable for those living in the UK, probably due to a combination of several factors. First, physical conditions have naturally played a role: while there are a number of over-land transport routes from Austria or Germany, those living in the UK are much more reliant on air travel. Second, the socio-economic circumstances of the various emigrant groups also influenced their ability and willingness to return home. Migration to the UK started earlier (immediately after EU accession) and is more characterised by longer-term migration patterns than in other EU Member States. Therefore, it can be assumed that a significant proportion of the Hungarians living in the UK at the beginning of the pandemic were better integrated into UK society and were thus less vulnerable in terms of labour-market and housing conditions. As we have seen previously, a higher proportion of Hungarians living in the UK than in the EU were employed in tertiary and administrative/clerical jobs. Compared to other labour-market sectors, these fields have adapted more quickly and successfully to the new situation resulting from the pandemic and ensuing social isolation measures and other policies (for example, in terms of switching to working from home) and workers in this sector were less affected by pandemic-related layoffs (Fana *et al.* 2020).

The data indicated that, in the first half of the 2010s, Hungarian emigrants to the UK were a more positively selected group compared to emigrants to the EU-27, with the UK being a more popular choice for longer-term emigrants. While the post-Brexit period has seen a broadening of the social base of emigration from Hungary to the UK and a greater prevalence of short-term mobility, these changes have also been largely observed for emigration to the other, current EU Member States. Nevertheless, in comparison to EU destination countries, emigrants to the UK remain a younger demographic, migrating for longer periods, with a higher proportion of urban migrants and of those in white-collar and service-sector occupations.

Although emigration from Hungary to the UK was not unprecedented prior to EU accession, it was nowhere near the scale of emigration after 2004. According to mirror statistics, only 6,000 Hungarian citizens were living in the UK in the year of the accession; this figure increased 6-fold to 36,000 by 2011 (Moreh 2014; Office for National Statistics 2021). In contrast, the number of Hungarian nationals in Germany was already 55,000 in the year of accession. However, due to selective labour-market

openings, the number had increased by only 150 per cent by 2011 – a much smaller increase compared to the UK. A further significant distinction is that the United Kingdom did not play a prominent role in the history of Hungarian emigration prior to EU accession. In contrast, Germany and Austria have long been traditional destinations for Hungarian emigration (Blaskó and Gödri 2016; Faragó 2017). Consequently, the transformation, in their case, with EU enlargement occurred in a more historically embedded context.

In light of this, the initially small number of Hungarians who emigrated to the UK immediately after accession can be identified in the literature as a group of ‘innovators’ or ‘pioneer emigrants’ (Black, Engbersen, Okólski and Pantîru 2010) who emigrated under different conditions to those in previous periods. The process initiated by this group subsequently led to the development of a migration system with its own socio-economic structures, which triggered further outflows from the origin country (Massey 1990). As the group of ‘innovators’ were the first to gain experience of the conditions and opportunities in the destination country, their migration entailed higher costs and risks than that of those who moved after the migration system had already been established. Consequently, the ‘innovators’ were a positively selected group from the origin society; typically, a young population with higher socio-economic status, based on labour-market criteria (de Haas 2010). The continuous feedback on the group’s experience to their respective original communities and the growing accessibility of information reduced the costs and risks of further emigration, thereby making migration available to increasingly broader segments of society. This, in turn, diversified the social base of subsequent migration (Bakewell, de Haas and Kubal 2012; de Haas 2010; Massey, Goldring and Durand 1994).

Conclusion

The phenomenon of emigration has been a subject of intense research in Hungary after the post-2004 EU enlargement and the opening of EU labour markets. The early 2010s were mostly characterised by the long-term emigration of highly educated younger social groups, with a notable proportion of these individuals relocating to the UK. Regarding the second half of the 2010s, there is an unfortunate paucity of available information. In order to provide data that are relevant to policy-makers, it is important to be aware of rapidly changing trends and recent patterns of migration.

Following a period (2016–2020) during which return migration was a more dominant phenomenon, emigration is on the rise once again. However, it is no longer to the UK, as was the case in the early 2010s. The UK has lost its importance among Hungarian emigrants, although it remains a significant emitter of return migrants who left Hungary at the beginning of the decade. The UK’s decision to leave the European Union has been identified as a significant factor in the observed shift in Hungarians’ migration patterns. Prior to the implementation of legal changes, there was already a notable reduction in Hungarian emigration to the UK, while return migration increased. In contrast, the impact of the COVID-19 outbreak has been relatively limited.

Over the past decade, there has been a significant shift in the structure of migration patterns. The importance of fluid forms of migration, short-term and circular mobility and the migration of manual workers and older age groups has increased. It is crucial for policy-makers to recognise that Hungarian migration is no longer a long-term or lifelong migration of highly skilled youth but a much more complex phenomenon. The recent rise of a mobile population, often characterised by back-and-forth movements, is clearly observable, with migration processes involving an increasingly broader section of the Hungarian population.

The research results also highlight the potential of administrative databases with a longitudinal structure, as well as the advantages of using flexible definitions that encompass fluid forms of migration. Furthermore, interrupted time-series analysis methods can be employed to quantify the impact of significant future events and policy changes on migration processes.

Notes

1. Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Slovakia and Slovenia.
2. Longitudinal data refer to information which is collected from the same units of analysis, such as individuals or households, over time (United Nations 2020).
3. Official migration statistics are based on the usual residence definition, which requires individuals to have resided abroad for at least 12 months in order to be considered migrants (Regulation (EC) No 862/2007 of the European Parliament and of the Council of 11 July 2007 on Community Statistics on Migration and International Protection and Repealing Council Regulation (EEC) No 311/76 on the Compilation of Statistics on Foreign Workers 2007; United Nations 1998).

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Data availability statement

The data are not publicly available due to privacy restrictions.

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Annex

Table 1. Number of migrants and migrations with a stay abroad of at least 3 months in the NHIF register between 2010 and 2022

	Number of migrants	Number of migrations
OUTFLOW		
United Kingdom	74,845	85,899
Other and unknown	413,684	492,200
Total	488,529	578,099
RETURN		
United Kingdom	36,966	43,928
Other and unknown	169,832	214,267
Total	206,798	258,195

Source: Edited by the author using data from NHIF.

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‘Thanks Sis! I Am Praying for Your Work Permit!’: The Role of the YouTube Vlogger’s Performance Authenticity in the Game with the Migrant Job-Seekers’ Needs

Olga Wanicka* 

Recently, online searching has become as important as more traditional methods of getting a job abroad. International labour migration is now influenced by new key actors – migrant micro-influencers who share international job opportunities and are increasingly trusted over established authorities. While media scholars analyse influencers’ self-presentation, their role in international labour migration remains underexplored. Migrant YouTube vloggers blend formal and informal brokerage and intermediary practices through ‘performance authenticity’ (Taylor 2022), achieved by a ‘mediated’ presence and intimacy, as well as the strategic ‘game with the expectations and needs’ of job-seeking viewers. It allows them to shift between formal and informal intermediation and brokerage, depending on the context and audience’s preferences. Through authenticity, migrant micro-influencers build trust and adapt their content to audience expectations in an online spectacle. This trust requires strategically blurring vloggers’ dual formal and informal roles. Using a visual and thematic content analysis of a Filipina vlogger’s YouTube channel, the study examines how migrant micro-influencers impact labour brokerage and intermediation. They do so by adapting to audience expectations and leveraging informal media conventions to enhance their credibility as brokers.

Keywords: Filipino international labour migration, brokerage, YouTube vlogger, performance authenticity, mediated intimacy, formality and informality

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Introduction

Like I always say: being a factory worker is just a stepping stone to better opportunities (...). Here, on my channel, I aim to inspire people, especially those who dream of going to Poland or Europe generally. I share with you my journey from the time I organised my documents for visa processing and then came here and became a factory worker (...).

This fragment consists of a statement posted by a Filipina YouTube vlogger, whom I refer to as Tina. Tina is a popular Filipina micro-influencer who advises people who would like to take up employment in Poland. Before she moved to Poland to work in a factory, she had worked in the Middle East. Her YouTube channel quickly gained recognition (with almost 19,000 followers), with videos surpassing 100,000 views. After a few months in Poland, during one of her livestreams, Tina revealed that she had changed her factory job and is now working as an employee of the recruitment agency, as a marketing manager. Surprisingly, she recommended herself as a broker for job-seekers interested in Poland.

The Internet has enabled unprecedented access to people and information through platforms like TikTok, Instagram and YouTube; this is the focus of my article. The literature on micro-celebrities and micro-influencers in digital ethnography is rapidly expanding (Cabalquinto and Soriano 2020; Hjorth, Horst, Galloway and Bell 2017; Jayadeva 2023; Ma 2022; Marwick 2015, 2019; Soriano and Gaw 2021; Tolson 2010; Wallis and Cui 2017; Zhang and Zhao 2020). The aforementioned scholars discuss how different influencers present themselves while they engage with observers (e.g., micro-communities) and managing publishing policies.

Micro-celebrities, as defined by Marwick (2019: 162), employ self-presentation strategies to establish credibility and authenticity. Authenticity, crucial for audiences, is crafted and performed by users and creators operating in the online space. Taylor (2022) argues that social media redefines authenticity as a visual tool, aiming to present content as real – a strategy commonly used by vloggers. Marwick (2019) notes that authenticity is also influenced by algorithms, while Jayadeva (2023) underlines the potential influencers' profit motives, such as advertising collaborations on YouTube. Authenticity is crucial for intermediaries, regardless of whether in real life or on YouTube, who are trusted for support and guidance (Tolson 2010). While scholars explore how influencers present themselves and engage with communities, the latter's role in international labour migration and job placement remains underexplored. This article suggests that vloggers emerge as significant new actors within the existing migration infrastructure (Wanicka 2024; Xiang and Lindquist 2014) using 'performance authenticity' (Taylor 2022) that both aligns with and extends the concept of traditional brokerage.

How can a vlogger's credibility in an informal job intermediating on YouTube be built through mediated and 'performance' authenticity? What role does the audience and its needs play in this online spectacle (Goffman 1956)? How can formal brokerage experience influence migrant-vloggers' activity on YouTube? What micro-influencer experiences enhance the credibility of labour brokers in reality? Understanding these aspects can draw researchers' attention to the influence that performative authenticity based on formal and informal role-blurring has on labour intermediation and brokerage in the online and offline spheres.

Tina strategically balances formal and informal roles, engaging viewers seeking jobs in Poland. In her videos, she presents herself as relatable and focused on the viewers' problems thanks to a planned performative strategy which both results from and influences her observers. This article examines the vloggers' 'game with the needs' of viewers through 'performed authenticity', shifting between formal and informal brokerage depending on the context.

The paper begins with a discussion on YouTube as a mediated space and the significance of presence and intimacy in building a vlogger's performance authenticity. I then look at online job-seeking and placement, discussing the concepts of mediation/brokerage in labour-migration studies within the context of shifting boundaries between formal and informal, in the activities of contemporary informal brokers. Afterwards, I present what the migration of Filipinos to Poland looks like according to the official data and literature, pointing out its non-traditionality and describing the research design used in the study. Finally, the results of the content analysis are presented. They refer to Tina's mediated and performance authenticity, which she uses in building credibility by balancing her role as a vlogger with her role as a real broker. The article concludes with a discussion.

YouTube as a site of mediation

Goodchild and Ferarri (2021: 107) call platforms 'intermediaries', since they enable the process of creating networks and the performance based on this matchmaking of people and services. Another valuable advantage of platforms is that they enable the acceleration of communication between the largest and the most distant audiences. Online platforms can also act as mediators due to their performativity, which constitutes a form of 'communicative technology' by translating the meanings (Goodchild and Ferrari 2021: 106). YouTube has become a space for many different actors who operate there for different purposes. One group consists of individual creators who take on the role of influencers (Abidin 2015; Tolson 2010) or micro-influencers (Marwick 2019) who create their content in a rather informal way, trying to reach diverse types of user. In research on micro-influencers, scholars often differentiate them from influencers based on the follower count. Marwick (2019) defines micro-influencers as individuals with up to 30,000 followers, whereas Zhang and Zhao (2020) view them as ordinary internet users with 1,000 to 100,000 followers and less significant than celebrities. This article adopts Zhang and Zhao's definition.

The number of studies on new micro versions of online celebrities and influencers – such as micro-celebrities (Marwick 2015, 2019), micro-communities (Strangelove 2010: 53–55) and micro-influencers (Soriano and Gaw 2021; Wallis and Cui 2017), including migrant vloggers (Cabalquinto and Soriano 2020; Jayadeva 2023; Lee and Abidin 2022; Ma 2022; Zhang and Zhao 2020) – in digital ethnography is growing rapidly. There are several examples of mediation between creators and users, which take place both in the exchange of comments (Schultes, Dorner and Lehner 2013: 663) and also in livestreams or videos recorded in response to others' statements or views published on YouTube (Hirzalla, Van Zoonen and Müller 2017). Furthermore, YouTube has provided a space for celebrities (Taylor 2022) such as musicians, athletes or actors (Hjorth *et al.* 2017) who formally define themselves and who often share their thoughts on the platform, with some content related to their lives and above all to their work shown 'behind the scenes'. Finally, YouTube as a platform has enabled formal actors, such as companies like recruitment agencies that act as intermediaries between job-seekers and employers (Wang, Hu, Wen and Lu 2024) but also non-governmental organisations or trade unions (Jansson and Uba 2019), to share their knowledge and experience, to network or publicise and agitate on political and social issues. Although the convention of social media itself tends to be more unofficial, how individual actors operate and formally define their practices on YouTube helps to state them as formal (e.g., politicians) or informal (most often micro-influencers). The line between such distinctions is blurred and often subjective (Soriano and Gaw 2021). Furthermore, this boundary changes over time as the number of followers increases, paid promotional partnerships are established and informal users become more formal.

The ordinary users who only observe the actions of others and do not create on their own – such as the person looking for work abroad, on whom I particularly focus in this article – are also important participants in this mediated community. They significantly shape how micro-influencers present themselves on YouTube and often determine the sustainability of their channels.

YouTube as a space for ‘mediated presence’ and ‘mediated intimacy’

YouTube has become a platform that gives its users a sense not only of presence but also of intimacy. Villi (2015) speaks about ‘mediated presence’ in social media, exemplified by vloggers who create a ‘sense of presence’, since their videos show real-time changes in emotions (even if strategically performed), surpassing text and image-based media. Shtern, Hill and Chan (2019) highlight this shift, emphasising the emotional impact and situational connection with the audience in a given moment. Madianou (2016: 183–184), who observes the transnational communication of Filipino migrants in the UK, created the term ‘ambient co-presence’, which she defines as an ‘increased awareness of the everyday lives and activities of significant others through the background presence of ubiquitous media environments’. ‘Ambient co-presence’ fosters an ‘ambient community’ (Madianou 2016), while social networks’ visibility on platforms like Facebook (Ellison and Boyd 2013) or YouTube enables conversational interactions through vlogs. Tolson (2010: 279), who examines YouTube vlogs in detail, considers them to be like no other tool, ‘conversational’ and ‘distinctively’ a form of mediated communication.

One of the basic building blocks of co-presence is a sense of intimacy between people; an intimacy, often sustained by video, which includes the immediacy of the message, weaving in an element of ‘fresh talk’ or acting in any film being recorded – which is, for example, a bedroom or even a toilet. ‘The effect is to construct co-presence and invite interaction, although of course none of this is live’ (Tolson 2010: 280). Cefai and Couldry (2019) refer to the concept of ‘mediated intimacy’, which they understand as the cultural context that makes mediated contact intimate, even without establishing an intimate relationship before. In the case of vloggers, it is done by maintaining a sense of ‘co-presence’ between those separated by miles. How information technologies can support long-distance intimacy was also described by Rooney (2013), who examined the ways and tools used to create a sense of mediated intimacy (e.g., through touch-signalling devices). Hjorth and Lim (2012: 478) argue that mobile media personalise public and private spaces, blurring and redefining online and offline boundaries through various forms of mobility and intimacy. The mediation of interpersonal relations and the way in which they are maintained through the creation of a sense of intimacy would not be possible without a certain performativity of creators in their relationships with their audiences, for whom authenticity is particularly important. Raun (2018) even believed that associations with the word ‘micro-celebrity’ refer to and signal accessibility, availability, presence, connectedness and – above all – authenticity, which is examined in detail in the article.

‘Performance authenticity’ on YouTube as a base of the ‘game’

In the past, scholars discussed the extent to which media figures such as actors or talk-show hosts (Tolson 2010) are authentic and the extent to which they are a kind of ‘construction’ and ‘performance’. Although the boundary is extremely thin and practically invisible, the desire for authenticity among viewers has existed for decades. This demand requires people like Tina to actively construct and present themselves as authentic.

The audience, which was previously responsible for directly assessing the creators' authenticity, has been deprived of it in a way, as part of the emergence of the Internet and the transfer of celebrities to the online sphere. The intrusion of the Internet into the relationship between audiences and individuals has thus been transformed and mediated by the construction of authenticity (Marshall 1997). Goffman (1956: 13) speaks about the face, claiming that we have been using the term 'performance' to refer to all the activity of an individual that occurs during a period marked by his continuous presence before a particular set of observers and which has some influence on the observers. People do not exist in a vacuum and create their presentation through the presence of others, who act as audiences in whose eyes they reflect and through whom they define themselves.

Wesch (2009: 22), building on Goffman (1956), suggests that face work is a collaborative process where every action and word influences how we present ourselves. Our identity is shaped by context, including location, companions and activities.

Through performativity, micro-influencers try to sustain authenticity in online spaces, thereby enabling them to cater to diverse audiences in various contexts. Taylor (2022: 26) called this phenomenon 'performance authenticity', which would be answered by a visual presentation of authenticity like 'realism'. Although Goffman emphasised that individuals perform social roles, the notion of 'performance authenticity' (Taylor 2022) helps to explain how influencers like Tina construct authenticity as part of their role. Rather than contradicting Goffman, it extends his view – authenticity becomes performative and shaped in interaction with audiences online.

Performance authenticity, in turn, is the basis for the 'game with the job-seekers needs', which I examine in this article to show how it affects the vlogger's blurring of the boundaries between what is formal and informal. Soriano and Gaw (2021: 783) refer to the not fully visible role of modern political brokers on YouTube by saying: 'We see this as unable to capture the complexity, nuance and "grayness" of the nature of political engagement by these actors on YouTube'. Hjorth and Lim (2012) as well as Patterson (2018) argued that media creation requires vloggers to constantly blur and reconstruct the boundaries between public and private space and thus often between their formal and informal roles. What interests me the most is the balancing act itself which is required of the vlogger and the blurring of formal and informal roles. Role-blurring is related to the need to move between different dimensions and contexts that indicate the person's creating online ambiguity. Tina's example illustrates this balancing well.

Online job-seeking and job placement

Online job-seeking and placement have become key methods for migrants and actors in the migration infrastructure, including informal brokers, formal recruitment agencies and employers (Xiang and Lindquist 2014). Platforms such as Instagram (Ayaydin 2020), Facebook (Cheng and Vicera 2022; De Guzman and Garcia 2017; Jayadeva 2019) and TikTok (Cabalquinto 2024; Chee 2023) have transformed into spaces for sharing information about working and living abroad.

Social media have broadened access to employment opportunities (for both enabled migrants and non-migrants) on an unprecedented scale, thanks to unlimited contact with potential employers and intermediaries (Ayaydin 2020; Fudge and Hobden 2018; Jayadeva 2023; Moriarty, Wickham, Krings, Salamonska and Bobek 2012; Wang *et al.* 2024), making it easier to verify hard-to-find information (Dekker, Engbersen, Klaver and Vonk 2018; Soriano and Gaw 2021). It is crucial for migrants, who often rely on content from intermediaries (Moriarty *et al.* 2012), such as videos or photos of accommodation,

workspaces or contracts. Recently, video technology has made job information more accessible for marginalised groups, providing salary ranges or task descriptions (Wang *et al.* 2024).

Online job-seeking for migrants has expanded through social media, enabling the sharing of job-related information and providing easier access to verification (Ayaydin 2020; Jayadeva 2019; Soriano and Gaw 2021). Overall, social media also enables employers and intermediaries to target migrant workers and present job opportunities, portraying migrant lives and sustain transnational networks (King and Wood 2013; Moriarty *et al.* 2012; Wang *et al.* 2024).

Brokerage in international labour migration

The Internet has profoundly impacted on international labour migration by enabling faster job-searching. The development of international labour migration has influenced the operation of the infrastructure that determines mobility nowadays. With the liberalisation of migration services (Xiang and Lindquist 2014), both formal and informal intermediaries are playing an increasingly important role in migrant navigation, often thanks to technology (Chen, Liu and Yeoh 2023). Thus, despite the growing number of studies on international labour migration, Oso, Kaczmarczyk and Salamońska (2022: 127) indicate that still-neglected areas of research should concern the impact of technology on structural changes and its consequences for mobility. Intermediaries maintain the migration system, managed by the governments of the sending countries, while facilitating mass international migration and perpetuating its commercial nature.

The Philippines have sent workers to Europe since the 19th century, driven by globalisation, poverty, unemployment (Lindquist 1993) and unstable political conditions. Since the 1970s, the Philippine government has been systematically developing regulations for labour migration; a significant step was the establishment of the Philippine Overseas Employment Administration (POEA) in 1974, which supervised recruitment processes (Guevarra 2009). The Philippine government not only controlled the migration process but also actively supported the development of recruitment agencies that helped citizens to find jobs abroad. Labour migration became central to economic growth through remittances (Parreñas 2015). In 2021, former President Rodrigo Duterte restructured the POEA into the Department of Migrant Workers (DMW) to improve migration management, controlling migrant movements as COVID-19 reduced remittances (Opiniano and Ang 2023). Despite the challenges, Filipino labour migration remains a key part of the country's economy and one of the most important sources of national income.

In the case of migration to Poland, recruitment agencies have become very active, imitating the trend of acquiring the workers from all over the world (Lindquist 1993; Xiang and Lindquist 2014). They are the leading actors in the framework of migration to new immigration destinations (Chen *et al.* 2023) that Poland has become for Filipinos. This is also visible in the case of economic migrants from other countries in Poland, as highlighted in Kindler and Szulecka's (2022) study on the repercussions of liberalised state policies. The opening of the 'windows' (Xiang and Lindquist 2014: 129) has led to a lack of real control over the actual market, as well as difficulties in obtaining verified information about work (increasingly published in shorthand online). In response, informal labour-migration brokers have become providers of such information.

Migration researchers have been concerned with the issue of informal brokers within international job placement for a long time (Baas 2020; Chen *et al.* 2023; Kern and Müller-Böker 2015; Lindquist 2012, 2025; Rodman and Counts 1983; Shrestha and Yeoh 2018). They are often presumed to be bridge-builders (Haxby 2021; Rodman and Counts 1983; Soriano and Gaw 2021) who enable and increase

employment opportunities abroad (Chee, Yeoh and Vu 2012). Another view of labour brokers identifies them more as hustlers (James 2011: 319) who exploit gullible migrants for their purposes (Kyle and Koslowski 2001; Nyberg Sørensen 2013) and reproduce and exacerbate social inequalities (Faist 2014; Fernandez 2013). Labour brokers, despite the different outlooks and assessments of the ethics of their behaviour, have become the most important actors in the migration infrastructure, with their ability to jump between its different dimensions.

Between formality and informality in brokerage

The literature on formality and informality in studies on intermediation and brokerage in the migration context is considerable (Kern and Müller-Böker 2015; Koster and Van Leynseele 2018; Lindquist 2015). Formality operates under formalised rules and obligations (e.g., established by the state), while informality does not require such arrangements. Nevertheless, Lindquist (2012: 75) claims that:

By moving attention from state actors and private agencies to informal brokers, distinctions between 'state' and 'market' as well as 'formal' and 'informal' become increasingly difficult to sustain. In fact, as an elementary-school teacher [who Lindquist perceives as an informal broker in his article] (...) he is actually a low-level bureaucrat and state official himself.

Taking informal brokers as a starting point thus allows us to move beyond these dichotomies'. Building on Lindquist's (2012) critique regarding the possibility to clearly distinguish between formality and informality in intermediation, one has to agree that these terms should be treated as theoretical constructs rather than actual different definitions. Lindquist (2012: 85) argues that formal and informal intermediaries are hard to differentiate since neither operates under clearly defined contracts and both collaborate with multiple agencies or employers. The boundary between formal and informal intermediation blurs as traditional state-regulated brokerage intertwines with modern informal strategies, both employing shared tactics despite operating within different legal and regulatory frameworks.

Baas (2020) highlights the key role of society and the state in defining formal or informal practices depending on the context and situation of migrants. Fudge and Hobden (2018) examine how informal intermediaries have influenced both the improvement and the deterioration of conditions for migrant domestic workers during the formalisation of their employment. Formality and informality in international labour brokerage are, therefore, not rigid opposites but, rather, dynamically interpenetrating spheres.

The vlogger as a non-typical labour broker

The international job search relies on online mediation, shaping the formal or informal roles of intermediaries. While terms such intermediary, mediator and broker are sometimes used interchangeably, their meanings differ. An intermediary usually connects 2 parties, for example a recruitment agency and migrants, a mediator resolves conflicts and interpret interests (Goodchild and Ferrari 2021), while a broker is defined by negotiating transactions for a benefit, often monetary or symbolic (Lindquist 2012; Xiang and Lindquist 2014). Brokerage is particularly crucial when access to information is limited (Soriano and Gaw 2021).

Lindquist (2012: 74) highlights various brokers, such as migrants, smugglers or low-state bureaucrats who possess social recognition, communication skills, networks and experience abroad. He also considers activists, musician brokers or military translators as brokers (Lindquist 2025). This article considers vloggers as hybrid figures who are operating between informal intermediaries and brokers. While they may not directly receive commissions, their influence often generates non-material gains such as social recognition, visibility and platform growth. In this sense, they fit within the broader understanding of brokerage, as outlined by Xiang and Lindquist (2014), where brokerages include prestige or reputational capital as key gains. Their ability to connect aspiring migrants with migration-related knowledge – often perceived as more trustworthy than formal agencies – positions them as key actors in the contemporary digital migration infrastructure.

Vloggers today resemble brokers, especially as their activities become more influential online (Janta and Ladkin 2013; Moriarty *et al.* 2012). They provide informal advice on living and working abroad, which is often more credible than that of recruitment agencies. Between 2018 and 2022, the number of Filipino vloggers in Poland increased. Most published materials are in Tagalog (Schachter and Reid 2018). Shtern *et al.* (2019: 1946) write about the conscious use of Tagalog by YouTube creators considering the preferences of most recipients, claiming that influencers who decided to speak English were also focused on reaching audiences outside Asia. Vloggers are perceived as informal brokers despite the risk of ‘information insecurity’ and confusion when relying on online migration helpers (Wall, Campbell and Janbek 2017). Vloggers like Tina also act as informal brokers, influencing the verifiability of information for aspiring migrant viewers (Dekker *et al.* 2018).

This article uses ‘broker’ and ‘intermediary’ notions (Lindquist 2025) since the situation I am focusing on concerns a person who performs the role of a labour broker in her real life and, albeit less explicitly, an intermediary role on her YouTube channel. Vloggers represent new, informal intermediaries who can act as brokers online, operating under unclear mediation conditions, as there is no formal information on how these processes occur, leaving the actual mediation opaque to viewers. The article explores how Tina strategically blurs her roles to meet viewers’ job-seeker needs.

Poland as a non-traditional destination for Filipinos

Historically, the most common migration destinations for Filipinos have been the United States (Espiritu 2002), the Middle East (Lindquist 1993) and Canada (Pratt 1999). In Europe, they primarily migrate to the United Kingdom, Italy, Belgium and Spain (Hacbang and Jusay 2007). However, recently, Central and Eastern Europe, in particular Poland, the Czech Republic and Hungary, have attracted Filipino workers. Traditionally, Overseas Filipino Workers (OFWs) in Europe have been employed as domestic workers, *au pairs*, nurses, seafarers or oil-rig workers (Hacbang and Jusay 2007). In recent years, however, many have also found employment in Central and Eastern Europe’s processing sector (Wanicka and Patzer 2024).

Poland became a popular destination for OFWs quite recently. The factors that promoted Poland as the so-called New Immigration Destination (NID) (Chen *et al.* 2023) were the historically low presence of foreign-born social networks and the low activity of integration supporting migrant institutions (Górny and Kaczmarczyk 2018). Despite bilateral Filipino–Czech agreements¹ regulating the acquisition of OFWs or opening a DMW satellite agency abroad – a Migrant Workers’ Office [MWO] in Hungary in October 2024² – it is Poland which has issued the most stay permits for migrants in the European Union in recent years³ (MFLSP – Ministry of Family, Labour and Social Policy – 2024). In 2024, Filipinos were the largest group⁴ compared to other migrants whose stay in Poland was regulated by possession of this

document (MFLSP n.d.). Many Filipinos are attracted to Poland due to the easier possibility of extending their stay and work compared to Taiwan (Ituriaga 2024: 56) or the Middle East.

I refer to Filipino labour migration to Poland not as the main object of analysis but as a contextual background that helps us to understand the activities and role of Filipino vloggers within the emerging digital dimension of contemporary migration infrastructure. Despite the efforts of the Philippine DMW to strictly regulate direct Filipino departures, Filipinos primarily arrive in Poland via Middle Eastern countries or countries such as Taiwan, Singapore or Hongkong (Wanicka and Patzer 2024). Filipinos in Poland are employed in sectors such as manufacturing, transport, administrative services, finance, food industry and agriculture (De Guzman and Garcia 2017). Additional key data about OFWs in Poland come from the Social Security Institution (SSI). In 2023, the most up-to-date data show that Filipinos found employment in *administrative and support activities, manufacturing, transport and storage* (SSI 2024). In Poland, Filipinos, therefore, take up occupations that are not typical for OFWs all over the world (such as domestic work or nursing). Contrary to global trends and highly feminised Filipino migration, there were more Filipino male migrants (6,155 men and 4,575 women) in Poland and their average age (35–39 years) was higher than for other migrant groups, such as Nepalese or Indians (SSI 2024). The flexibility of the labour market, the demand for production workers regardless of gender and age and Poland's Schengen membership (Wanicka and Patzer 2024) play key roles in attracting OFWs to the country.

The Filipino community in Poland is at an early stage of formation but has been growing rapidly, with increasing Filipino institutions like religious or sports communities (e.g., Pinoy Warsaw Basketball League) and businesses like restaurants. Social media, like Facebook, are widely used by Filipinos in Poland to connect and share information. The activity of Filipino migrants in Poland is also visible on YouTube channels, where migrants seek both information and emotional support.

Research design

I analyse the Filipina migrant YouTube vlog run by Tina, who provides employment advice in Poland. Unlike other Filipino vloggers who avoid formal recruiters, she collaborates with a recruitment agency and shares content mostly in English, making her case atypical. Her dual role as a vlogger and a labour broker attracts an audience seeking both lifestyle content and job opportunities. Thus, Tina's channel was selected because it provides a lens through which to explore how migrants may balance the roles of vlogger and labour broker and how authenticity is performed in the context of international labour migration. Her channel was selected due to the high engagement with videos focusing on life and work in Poland, which distinguished her from other Filipino vloggers. Aware of the limitations of a single case study, I use Tina's case to offer in-depth insights into digital brokerage and role-blurring in migration. While several Filipino vloggers publish similar migration-related content across platforms, her high visibility, bilingual content and offline recruitment role make her a particularly valuable example. Although the findings are not representative of all Filipino vloggers, they provide valuable understanding of how authenticity and credibility are performed and negotiated in international labour-migration contexts.

Tina's channel, created in 2020, contains around 100 videos (lasting no more than 30 minutes) covering work – including various institution visits – and travel. In the paper I analyse vloggers' performativity and role-blurring using video content (including livestreams⁵) and viewer comments. YouTube was chosen based on findings from conducting the PhD project titled 'Poland's Inclusion to the Global Network of Job Placement: The Case of Overseas Filipino Workers' which highlighted its growing

role in providing visually verifiable information on life and work in Poland and making it ideal for analysing performativity.

The analysis centred on the visual and narrative content of YouTube videos (Burges and Green 2018; Flick 2009; Lange 2019), examining how Tina creates authenticity through her roles as both a vlogger and a labour broker. The study examines how she constructs authenticity through shifting roles (Goffman 1956), seamlessly transitioning from lifestyle content to job-related advice, making her unique as both a micro-influencer and a broker. I focused on content in English as it was the primary language used by Tina and it helped me to understand her approach, due to my limited knowledge of the Filipino language. Some videos in Taglish⁶ were also analysed, especially during live streams, as they were more accessible to me and a wider audience (Cabalquinto and Soriano 2020).

I examined Tina's non-verbal content, such as camera positioning, recording locations and her behaviour in the video, noting emotional expressions like laughter or tiredness. The analysis also looked at marketing strategies, such as subscription reminders and the use of music, as well as the changing presentation styles of her videos, from simple narratives to dynamic video tours (Wang *et al.* 2024). Camera positioning and the choice of recording locations were varied – from everyday spaces (bedroom, kitchen, bathroom, work's locker room or the supermarket) to professional backgrounds (with stylish furniture or flowers behind). I paid attention to how the vlogger performs and builds a co-presence and intimacy with the audience, balancing the role of a friend and an expert helping migrants to find a job in Poland.

Comments were put into the *YouTube Data Tools programme*⁷, which served only as a tool to organise the comments into a structured Excel table, while I conducted the actual coding manually. Using a grounded theory approach, I inductively identified the main categories in the comments, based on the recurring themes and topics which they addressed. A thematic content analysis (Franzosi 2004) of 2,000 comments (from a total of 4,296) identified key topics discussed in the videos and comments, such as *recruitment agencies, visas, work permits, daily life costs and job tips*, as well as viewer requests for Tina's *assistance* or those suggesting the *formation of a community*.⁸

YouTube as a research subject raises ethical concerns, particularly regarding participant consent. Jayadeva (2019: 2243) noted that, despite obtaining admin consent, not all Facebook users were aware of her research position due to frequent member turnover. Since it is difficult to obtain consent from every YouTube user and creator, I follow the researchers who view YouTube analysis as public discourse analysis (Dołowy-Rybińska 2016), with users giving conscious consent by posting videos and comments online (Cabalquinto and Soriano 2020: 902; Morrow, Hawkins and Kern 2015: 536–537; Patterson 2018: 762). Additionally, I did not participate in comment discussions or influence any interactions (Jayadeva 2019) and all analysed videos were publicly posted on YouTube (not via PayPal or special codes), so informed consent was not obtained.

To protect anonymity, I gave each vlogger a pseudonym, slightly altered some comments and anonymised sensitive data. As the number of videos, comments and observers on the analysed channel changed daily, this makes the vlogger's identification difficult. Tina is atypical but she is not the only Filipina micro-influencer in Poland – sharing content in English, having a broader migration background and discussing topics like salaries and recruitment stages. Such Filipino vlogs are in the public domain and are available on YouTube.

Although I do not implement traditional discourse analysis, I use a broader view of discourse that includes both language and visuals shaping meaning in context (Rose 2016; Wodak and Meyer 2009). My approach examines how vlog content and audience comments together create narratives of credibility. Direct quotes support only key interpretative insights, aligning with discourse-based

methods. I ensured that any quotes used were anonymised and de-identified to the greatest extent possible, following the principles outlined in *Internet Research: Ethical Guidelines 3.0* (Association of Internet Researchers 2020: 11). To minimise any risk of tracing them back to individual users, usernames were removed, identifiable details were altered and references to unique or traceable information were avoided.

The vlogger's role-blurring

It happens that intermediaries have previously achieved migration success (Lindquist 2012, 2015). Tina, who acts as a vlogger and a labour broker, is primarily a migrant. Her narrative is based on experiences gained both abroad and in her country of origin, bringing together these 2 interpenetrating perspectives (Zhang and Zhao 2020). Her online narratives are shaped by her overseas life and this affects her performance. She can, thus, compare her previous and current situations (including that of employment) while focusing primarily on reaching a wider multinational⁹ community. Blurring the roles describes Tina's involvement in the informal intermediary activity on her own YouTube channel and her formal work for the recruitment agency as a labour broker. For illustration, I use 2 examples of an exchange of comments between Tina and her followers. In the first, Tina was asked to recommend a recruitment agency, which she often mentions on her channel, referring to her experience of working in Poland:

Follower: *Please, tell me about [agency name]. How does it work?*

Tina: *I work there and this is my personal vlog so, unfortunately, I can't mix my work and personal life. Thanks for respecting my decision.*

A few comments later, asked in a more flattering way virtually the same thing, Tina replies

Follower: *Thanks, m'am¹⁰ Tina for sharing your experience. You are so humble the way you advice others to work and apply in Poland po¹¹ (...). May I ask po m'am, to what agency did you apply? (...) I am planning to work in Poland po, as a stepping stone. Thanks a lot, po. I hope you have free time to answer my inquiry. God blessed po and take care 🙏💯.*

Tina: *Thanks, sis, for the kind words, yes, my agency is [agency name] and since I'm officially working with them, you can send me a direct message on my FB page or personal account – TINA [surname] for a faster response. Thanks!*

What I perceive as Tina's 'game with the job-seekers' needs' is the fact that, on YouTube, most of the time she presents herself as just a migrant who shares her experience (primarily to inspire and help others); however, she only talks about her real relationship with the recruitment agency when it suits her and when she sees a purpose in it.

This blurring of roles is key to the analysis, which aims to explore how vloggers subvert the formality–informality distinction by playing with viewers' (mainly migrant job-seekers') expectations. On the internet, Tina is a formal vlogger, but she also plays an informal labour broker. In real life, however, she is a formal labour broker, sometimes defining herself through her YouTube experience and presenting herself as an informal vlogger.

This is done mostly by her balancing between formality and informality. Tina does not hide her role in blurring the arrangements that stand behind her. This is her game, which features leaps between formal and informal, in which performance, ambiguity and stretching are the essence of what happens.

Building performance authenticity: Playing with viewers' expectations

Hello! In this video, I am going to show you the positive things about being a factory worker (...). In my previous video, I shared with you the throwback or the disadvantages of being a factory worker. The reason why I did that was to set proper expectations with you... Then, I get feedback, that I am not talking about reality (...). I realised that I need to share the throwbacks and advantages of being a factory worker too. Well... as a matter of fact, being positive is realistic as well and is not just about negativity. Now I will share with you the perks of being a factory worker to show you both sides of the coin (...). After you see both sides it's up to you now to contemplate and analyse whether you are ready to go for your dream... to work as a factory worker here.

In this video segment, Tina highlights the advantages of working in a factory, drawing from her own experience. She contrasts it with office work, noting the absence of prolonged mental stress and the flexibility it offers. In the previous video, Tina showed her work conditions accurately from the inside and also mentioned the cons – such as the need to carry boxes frequently – and pointing out that factory work does not suit everyone, which confirms her experience as an authentic person who does not try to distort reality. Ma (2022) suggests that creators like Tina must constantly adapt to the audience's expectations and to the many possible generalised others who are always present in non-face-to-face contact. She just does it through the lens of the camera. This adoption is one of the ways of building a sense of co-presence. This is evident in Tina's presentation style in which, by changing and adapting to its recipients, she confirms the assumption that her authenticity is negotiated (Wesch 2009) concerning the roles assumed on YouTube (Shtern *et al.* 2019). Tina, like other micro-influencers, gives off an air of closeness and familiarity, suggesting her naturality and often imperfection. Her emotional disclosure is crucial here in creating a sense of credibility. She calls her viewers *kabayan*,¹² which also refers to close friends and relatives. While speaking, she uses lively gestures – pointing at the virtual recipients, yawning and smiling. Therefore, she seems to be more personal and this is also noticed by the viewer:

Follower: Your body language and affect blends here are natural and realistic, though I could see that you are tired when you made this one but that is okay. What matters is that you are true to yourself and to everyone. God bless you, Tina!

Tina: Thank you. God bless you more!

We see here confirmation of Taylor's (2022: 102) statement that 'influencers are only as authentic as their audience believes them to be'. The choice of such a strategy is described by Marwick (2015), who studied different ways of approaching an audience and distinguished them depending on the platform chosen by the creator (e.g., through sloppiness and familiarity on YouTube and professionalism on Tumblr). Shtern *et al.* (2019) emphasise Filipino creators' complex content navigation between audience demands. Tina's strategy of self-presentation is focused on building trust, which is appreciated by her followers:

Follower: *You just make my day sis, I love u,¹³ you are such an honest person.*

Tina: *Thank you so much for the feedback. It inspires me more. God bless.*

Additionally, Tina often refers to her belief in God's agency (explaining that, thanks to it, she managed to find a job in Poland). She often ends her videos and comments with 'God bless', reflecting Filipinos' belief in divine help, which enhances her authenticity and popularity, fostering a sense of closeness online (Tolson 2010). Jayadeva (2023: 4) argues that independent advisers' value as intermediaries is shown by the fact that they share the same cultural and local understanding as their audience, which may explain their gaining wider sympathy.

Tina also uses self-creation, in which she responds to self-criticism more ironically and sarcastically, which makes her become 'closer' to ordinary people (Tolson 2010: 281) who observe her:

Follower: *Referring to your video. It's called an hourly wage, not a salary.*

Tina: *Yes, correct. Thx¹⁴ for reminding me. I have known about this since high school, but I'm just a human who also forgets and gets preoccupied with factory work. Lol¹⁵*

Following Goffman's (1956) statements about performance as a basis for 'working on face', Tina wants people to perceive her in a certain way. Even though she knows that she lacks complete knowledge on every topic, she wants her audience to see her as an authority – something she gradually begins to believe herself, occasionally referring to herself as an informal expert. In this context, sarcasm can be seen as creating tension between authenticity and the conscious construction of reality. Looking at the 2 examples above, one can see that Tina also balances the language she uses, which becomes more or less formal (Tolson 2010) depending on the context and her perception of the recipient's words.

Comments expressing gratitude indicate a community centred around Tina's channel. She also informs them when the next video is coming out or how she is feeling. Jayadeva (2023: 12) described similar strategies of constant dialogue between influencers and observers to sustain the narrative of 'one big family'. During the livestream, Tina allows direct contact (with or without the camera on), which enables her followers to talk in real-time and ask about details that interest them in connection with the work in Poland. Such a real consultation (Wang *et al.* 2024) also affects the sense of mediated presence on YouTube.

All of the aforementioned factors create Tina as a person who is approachable by her followers and could be perceived as a planned strategy. An especially noted and appreciated response to the needs of commenters is her publishing her content in English.¹⁶

Follower: *I am glad you speak English in most of your videos.* 👍 🧐

Tina: *Thanks; I have to since Filipinos can understand English and my target audience is multinational.* 😊

Since Tina succeeded, how she portrays her life in Poland evokes admiration and awe:

Follower: *Hi! Tina welcome to Poland :) I'm happy to hear your story. I wish I can interview u. I'm a small YouTuber :) I salute¹⁷ all production workers in Poland. (...) U are an inspiration. Keep doing great. God bless! :)*

Tina: *Hi sis! Thank you for the warm welcome and of course, you can [interview me]. I really feel humbled to be given that opportunity. Please send me a message on my FB Account: [TINA] so we can discuss more.*

The non-sharing of negative experiences and obtaining 'positive' reactions from the audience (Wallis and Cui 2017) can be just a different performative strategy used by YouTubers (Marwick 2015) which somewhat explains Tina's brief response:

Follower: *This looks like very hard work. Do you get paid for overtime when you're working a 12-hour shift? Does your employer cover the cost of accommodation and commuting to work? Good luck making a life for yourself in Poland!*

Tina: *Hi. Yeah, we are paid for doing overtime... but, since last month, we are back to normal 9-hour shifts, so it's not that tiresome anymore. Yes, accommodation and transportation are provided by the company. Thanks.*

Concealing negative experiences in the media may be a result of prevailing beliefs about 'heroism' and 'sacrifice' (Guevarra 2009). The departure of migrants from the Philippines often involves the need to support a family permanently. The obligation to send remittances, which families left behind in the origin country expect, leads migrants to hide any difficult experiences which could be worrying, provoke family conflict or testify to their failure abroad (Asis 2006; Gotehus 2023; Madianou 2017).

On the other hand, Tina uses her personal experience which also builds her authentic perception. The topics she undertakes to speak on range from living costs to employment conditions in Poland, addressing viewers' inquiries about salaries, overtime and employer services; Tina deals with them by providing knowledge in a condensed form. She sensitises followers to potential migration challenges and advises them to carry out thorough research before engaging with recruitment agencies, cautioning them against hasty decisions that could result in indebtedness as well as being trapped in other precarious situations. Furthermore, Tina clarifies terms like gross and net profit, often misrepresented by recruitment agencies. As an informal intermediary with first-hand experience, she is more effective (Chen *et al.* 2023).

On her YouTube channel, Tina also provides information in a 'softer' and more understandable way than formal intermediaries. Again, we can see Tina 'playing' with the expectations of her viewers. She knows how the informal communication and accessible language on her YouTube channel help to distance her from typical formal brokers through whose prism she does not want to be perceived as an informal vlogger. In the current situation of uncertainty and related changes in the labour market, there is a visible tendency to look for new helpers outside one's close kinship networks (Dalgas 2016; Jayadeva 2019). Unlike formal agencies, which often leave migrants feeling uncertain, Tina offers an additional source of security. Her approachability as a native Filipina (De Guzman and Garcia 2017; Lindquist 2012) makes her a trusted figure, which is often bestowed upon her without deeper verification. Del Rosario's (2007: 236–237) study shows that informal OFW networks in new destinations are the most reliable source of trust, offering clear information without hidden agendas,

unlike formal institutions. Informal networks, like Tina's, are seen as more reliable due to their accessibility and transparency, with no perceived ulterior motives. Through 'mediated presence' (Villi 2015) on YouTube, Tina adapts to her audience's needs, effectively engaging them with performative practices to enhance her authenticity.

Hjorth and Lim (2012: 480) claim that:

Mobile media can be considered as part of shifts in conceptualising and practicing intimacy as no longer a 'private' activity but a pivotal component of public sphere performativity (...). Intimacies here not only refer to the kinds of intimacies that exist between lovers, family members, or close friends (though these can and do play a role). Intimacies can also exist at a social or cultural level.

Such public creation of privacy between the vlogger and the audience is evident in the case study. Both geographical and social distances shrink when Tina refers to her own experiences, which allow her to naturally burst with joy and evoke a positive feeling (Lindquist 2015: 171). Contemporary media practices mediate intimacy by referring to behaviours such as recording materials and communicating with audiences from, for example, individuals' homes. Message personalisation performs intimacy and blurs the boundaries between the offline (home) and the online (YouTube) world (Tolson 2010). Content recording from home, with flatmates suddenly appearing in the background, gives viewers an additional feeling 'of being in conversation with a friend in the intimate setting of their home' (Jayadeva 2023: 11). Abidin (2015) believes that internet creators prioritise intimacy over authenticity, using performative practices. Tina's live gestures foster closeness and care in order to build her 'authentic' image. She uses an intimate tone to make the audience feel that they are on the same level or as if they are already close friends. Rooney (2013: 885) claims that engaging in intimate interactions largely involves joking, storytelling or making plans together because it allows for an ongoing awareness of each other. Tina seems to be aware of this approach.

Tolson (2010) argues that an attractive way of communicating by adopting ordinary talk forms contributes to build authenticity. This is another reason why Tina tries to fill the gap (existing within geographical boundaries and felt by the camera) between herself and her followers, which Taylor (2022) points to as a potential way of presentation through performative authenticity, possibly thanks to the feeling of special intimacy. Her 'ordinariness' shows in how much she shares about herself (Tolson 2010), from job changes to consulate visits and cooperation with the authorities. It supports Raun (2018: 104), who argues that audiences expect micro-celebrities to be 'transparent, open and authentic', which includes disclosing intimate information.

Mediated intimacy (Cefai and Couldry 2019) is also approached primarily through the camera setups and 'backstages' (Raun 2018: 107), locations in which Tina records her videos. The places include her bed, her kitchen and even her bathroom; the way she invites viewers into her life, showing them what she has in the fridge, the colour of the towel in her bathroom or how she changes into her work clothes in the factory locker room is how her intimacy with viewers contributes to her authenticity.

Vlogger balancing between an informal and a formal role

Tina is constantly both formal and informal depending on her chosen strategy and the choice of a particular 'face' (Goffmann 1956). In referring to her blurring the roles earlier, I wanted to demonstrate that her balancing is planned and used by her whenever it suits her. The example below shows that Tina does

not respond to comments that might cast her role as a formal labour broker in real life in a negative light. She responds only to those she wants to, ignoring the first one:

Follower: Pls¹⁸ don't pay any money to Tina's [recruitment agency name], they are fraudulent/scammers, they will take money from 1,000 applicants and make visas for 10. They will intentionally defraud the remaining to make more profits. I'm a victim and I won't let anyone watching this be a victim like me (...) don't mind the agents they are paid based on commission, that's why they will sweet talk you into making a payment and losing your hard-earned money like I did, pls be warned.

Follower: Ms Tina, can I really start the process? Is it possible to get a visa?

Tina: Kindly contact him. He's a good friend and colleague and can definitely assist you. [https://www.facebook.com/\[broker's friend name\]](https://www.facebook.com/[broker's friend name]).

Analysis has shown that Tina gradually removes the comments that do not align with her narrative on the vlog. However, she receives so many of them that she cannot always keep up.

Tina not only provides her contact details but also offers personal contact with agency colleagues. By doing this, she can distance herself from any accusations of negative practices done by the agency that employs her, as in the example below:

Follower: Very informative (...). Madam please, I need some advice from you; planning to move to Poland too... Here is my email: [email address].

Tina: Thank u for the feedback; if you have questions, you can ask here, brother. But please note that I am not a legal advisor nor an agent, so i highly recommend that you contact one. You can search for [broker's friend name] fb pages (...). For sure they can help.

Publicly publishing contacts to other brokers working with Tina in the same agency alludes to Ellison and Boyd's (2013) conclusions about the expansion and publicisation of social contacts in the informal online space, which in Tina's case may help her in formal broker work.

My analysis shows that by 'game' and informal intermediary popularity, Tina's authenticity may be put above the credibility of formal brokers – for example, when she refers to the amount of the typical placement fee in the video and gets a comment:

Follower: Thank you, Tina, for sharing your all experience. It's mean maximum cost is 10,000 dirhams but my agent's demand is around 20,000 dirhams – my God, they are cheating me.

Jayadeva (2023: 12) claims that, in the YouTuber's case, those who were already known to aspiring student-migrants and their families, even if they offered something less prestigious than other available options, could be considered more credible and convincing precisely because of their popularity as experts in the online space. Thanks to the Internet and vlogging, ordinary people are becoming experts (Tolson 2010: 284) – they are perceived as such on their YouTube channels by the audience.

Tina's navigation between the formal and the informal is also manifested in the framework in which she presents herself as an independent and altruistic expert who, however, has gained 'secret knowledge' by changing her factory job to work in a recruitment agency. For aspiring migrants (her viewers), it can seem

that she is, informally, able to help to deal with employment without going through a long chain of formal brokers. While the fees for informal recruiters' services are increasingly disproportionate to the earnings of migrants (Xiang and Lindquist 2014: 123), informal brokers continue to play a special role in the mediation of migration in East and Southeast Asia (Lindquist, Xiang and Yeoh 2012). For Tina's recipients, the YouTube channel becomes a valuable guide which is, above all, free (Goodchild and Ferrari 2021):

Follower: Life is a journey, and place to learn. In a way of learning cost us money, time and efforts. Great to know all of these things you have given to all of us free!

By engaging with viewers, Tina benefits as a formal broker. By getting informal questions from her followers, she gains knowledge that may come in handy in her formal job at a recruitment agency. Jayadeva (2023: 8) claims that sharing experiences for free is appreciated and could eventually lead to financial recognition in the future. By playing with the viewers' expectations and bypassing formal and informal roles, Tina builds her social capital through a 'sense of community' (Raun 2018), enthusiasm and support, which potentially monetises her presence in the form of a solid base of contacts (Shtern *et al.* 2019). As a vlogger, Tina's formal advice masks commercial gains through the 'game with authenticity'. She blends her roles as an informal adviser and a formal broker. She asks for a formal reference if a viewer of her channel is hired by the agency where Tina works in reality:

Follower: Ms Tina, can I really start the process? Is it possible to get a visa?

Tina: Try to connect to [broker name] of [agency name] on fb page. Tell her i referred you.

The strategy of referencing to expand the social network of intermediaries is also described by Chee *et al.* (2012). Although it is not clear whether she earns money from running her channel, she is also guided by non-financial benefits, such as an increase in popularity and a source of emotional support or prestige (Lee and Abidin 2022; Xiang and Lindquist 2014).

Koster and Van Laynseele (2018) emphasise the role of social capital in expanding brokers' market reach. Contact with Tina provides migrants with international opportunities (Chen *et al.* 2023; Jayadeva 2019). She can reach even more job-seekers and it is difficult to control her as a formal recruitment agency representative, whose work duties are defined by a specific employment contract which can be terminated in case of a violation or exceeding authority. Engaging individual informal vloggers to work in formal recruitment agencies seems to be a strategy for hidden commercial goals, since producing a micro-influencer also requires collaboration between various hidden actors outside the formal sphere (Dumont 2017).

Another visible manifestation in Tinas's videos, in addition to her everyday impeccable appearance, demonstrates her ordinary lifestyle (e.g., frequent trips around Poland or living in a well-furnished apartment provided by the agency), which most of her viewers are probably unable to afford. Taylor (2022: 102) argued that audiences see micro-influencers' success as earned through resourcefulness, viewing them as more authentic despite their hidden circumstances. Nevertheless, such a 'creation' of reality is very attractive to Tina's audience and is visible in their comments:

Follower: Very nice accommodation, better than a regular Polish apartment, honestly. And surprisingly, so many Filipinos are working in Poland nowadays. Won't be surprised to hear Tagalog in buses and malls 😊.

Tina: Thanks and, yes, it is indeed.

Here, another aspect of Tina's role-blurring is evident. Her video once featured an apartment provided by the agency but she later changed the video title to reflect the potential price increase or the apartment no longer being available. The accommodation now offered could be different or worse but the previous video still shapes viewers' – mainly migrant job-seekers' – expectations. Such a shift indicates that Tina stays informed about current conditions; with her informal knowledge from formal work, she is blending her informal YouTube insights.

Tina's balancing act is necessary primarily because her audience demands it. Depending on the needs and preferences, the vlogger is more or less formal. He or she can present as a vlogger or a labour broker, depending on the context of communication with the audience and the intended purpose of performing.

Discussion

The article explores how a vlogger blurs formal and informal roles by playing with the expectations and needs via 'performance authenticity', achieved thanks to the mediated presence and intimacy.

Tina builds authenticity by strategically positioning herself in front of or behind the camera to emphasise presence. Close-up shots create a 'face-to-face' effect (Tolson 2010), while filming in personal spaces like her home or workplace fosters relatability. 'Mediated presence' (Villi 2015) but especially 'intimacy' (Abidin 2015) also results from the fact that Tina records in places associated with privacy – in bed, cloakroom and even the bathroom, inviting the audience to her personal, intimate world (Raun 2018).

Furthermore, Tina gains a presence and intimacy through props that she uses to visualise her story. Work uniforms, lunch boxes or rice-cookers familiar to Filipino migrants signal, especially for compatriots, authenticity and suggest that she is 'one of us'. Moreover, her props play an educational role, as when she showcases budget-friendly Polish products in the supermarket to help newcomers to navigate life abroad. The occasional appearance of her co-workers in the background enhances the sense of realism.

Non-verbal communication also strengthens a vlogger's authenticity. Expressive gestures, laughter and eye-rolling make him or her appear natural and relatable. Through Goffman's (1956) 'work on face', Tina makes her exhaustion visible, enhancing her perceived naturalness and deepening intimacy with viewers, with whom she appears to share emotions (Abidin 2015).

Tina's strategic choice of YouTube and verbal narrative adjustment reflect Marwick's (2015) views on building an image through platform familiarity. By balancing formal and informal language, humour and cultural references, she connects to her audience. Calling viewers '*kabayan*' and incorporating religious phrases strengthens this bond, particularly with Filipino viewers (Jayadeva 2023). Being the only Filipino micro-influencer in Poland who uses mostly English also enhances Tina's accessibility. Regular interaction (Rooney 2013), sharing details about life (Wange *et al.* 2024) and responding quickly to comments all foster trust and a sense of community (Wanicka 2024). Her dialogues with recipients resemble everyday conversations (Tolson 2010), which strengthens the impression of authenticity and direct contact.

The article explores how vloggers' credibility in informal job-intermediating on YouTube is built through mediated and performance authenticity fostering presence, intimacy and trust (Goodchild and Ferarri 2021; Raun 2018). By sharing personal job-seeking experiences and insights into the Polish labour market (Jayadeva 2023), Tina positions herself as an 'ordinary expert' (Tolson 2010). Her transparency in discussing job changes and experiences as a labour broker further strengthens her image. YouTube enables Tina to share knowledge through various means – personal stories, live

conversations and comment responses. Her positivity-driven approach aligns with Filipino cultural norms of resilience, avoiding displays of weakness (Guevarra 2009; Wallis and Cui 2017). All the aforementioned factors enhance her credibility both on- (Jayadeva 2023) and offline (Lindquist 2012). By involving her audience in content decisions, she fosters inclusivity and responsiveness (Wanicka 2024) and, in so doing, she becomes a trusted figure, providing guidance (Dalgas 2016) while reinforcing her role in informal job intermediation on YouTube.

Audience perception plays a crucial role in shaping Tina's credibility. Online authenticity is fragile and subject to scrutiny according to Taylor (2022), who argues that judging authenticity maintains social control, as is evident in Tina's efforts to satisfy the audience's informational needs. YouTube vlogs, relying on directness, amateurism and interaction (Tolson 2010), require continuous adaptation. Tina manages her 'working on face' (Goffman 1956) by adjusting informality, approachability and engagement based on audience demand (Marwick 2015; Shtern *et al.* 2019). Viewers actively evaluate her credibility, shaping her strategies and reinforcing her authenticity.

This article also examines how Tina's formal brokerage experience influences her vlogging. Her industry expertise enhances her reach as viewers trust her real-world experience. Unlike formal intermediaries, she balances professionalism with informality, making her more accessible. By publicly sharing her migration journey and brokerage connections (Chee *et al.* 2012; Ellison and Boyd 2013), she strengthens her credibility.

Even if she does not currently monetise her YouTube presence, she could leverage it for future brokerage work. Her online engagement fosters a trusted community (Shtern *et al.* 2019) and enhances her credibility in real-world job placement. As a well-known figure, she understands migrants' needs, using her recognition to strengthen her role as a formal labour broker (Jayadeva 2023).

This article analyses how Tina plays a 'game' with audience expectations by balancing formal and informal roles. Her success in both vlogging and brokerage relies on performed authenticity. Her informal intermediary's or formal broker's face depends on the analysed context. She selectively acknowledges her formal role when beneficial while avoiding discussions that might undermine her credibility. She presents herself as an altruistic helper yet does not clarify why she refers job-seekers to formal brokers. Her role-shifting is particularly evident in how she alternates between personal experiences and formal knowledge. For instance, when updating videos about agency accommodations, she carefully blends informal storytelling with authoritative insights. This balancing act reflects the interplay of online and offline knowledge-sharing, reinforcing her credibility as both a vlogger and a broker. However, positioning herself as an informal expert while referencing formal labour agency knowledge allows her to offer practical job-seeking, bypassing traditional intermediaries (Goodchild and Ferrari 2021; Xiang and Lindquist 2014). Here, her formal and informal role-blurring is particularly visible and results from the game played with the expectations of viewers – migrant job-seekers.

Lindquist (2012) highlights the fluidity between formal and informal roles in labour migration, where brokers shift based on context and potential benefits. This study shows how micro-influencers, like Tina, act as both informal intermediaries and formal brokers, reshaping traditional brokerage roles (Lindquist 2025). Lindquist (2012: 86) notes that successful brokers are often ordinary figures – teachers, low-level bureaucrats – trusted across communities. Following up on his characteristics, the case described in this article provides an illustrative study with some differences. Tina fits this model but operates in an online setting. Her ability to connect with diverse audiences, organise community meetings and interpret regulations enhances her reliability. Despite the lack of clarity about her formal role, Tina's guidance enhances her effectiveness as both an informal and a formal broker.

Chen *et al.* (2023) argue that online intermediaries play a crucial role in migration, particularly in regions with limited networks, like Poland. Dekker *et al.* (2018) note that those exploring new migration destinations often rely on the media, highlighting vloggers' role in job placement. Future uncertainty drives migrants to seek new, non-kinship networks (Dalgas 2016), with vloggers providing hidden contacts and lowering migration costs, even when collaborating with recruitment agencies.

This article illustrates how vloggers who also act as labour brokers use authenticity as a strategy to mediate employment, skilfully playing with the viewer's expectations and the job-seekers needs. It is possible by the blurring of the formal and informal roles, thanks to mediated presence and intimacy. Tina's case exemplifies how the reconceptualisation of authenticity influences informal intermediation, making her role a significant subject for migration researchers.

Notes

1. On 14 March 2024, the Philippines and the Czech Republic signed a bilateral agreement to increase the annual limit for Filipino migrant workers to 10,300, focusing on sectors such as manufacturing, IT and healthcare (see Gita-Carlos 2024).
2. See GMA News (2024).
3. In 2023, Poland issued 642,800 permits for foreigners to stay, the highest number in the European Union according to Eurostat data (Poland Insight 2024).
4. The Polish Ministry of Family, Labour and Social Policy issued 37,988 work permits for Filipinos in 2024 (MFLSP n.d.).
5. Livestreaming is the real-time broadcast of video content over the Internet.
6. Using Tagalog and the English language in one sentence (see Collins Dictionary n.d.).
7. Previously, YouTube was not an easy platform to study and analyse due to the necessity of manual data collection and narrowing down the sample size. Nowadays, computer programmes enable a full analysis of online data, for example: the *YouTube Data Tool* that enables the extraction of data from videos, channels and search queries. *YouTube Data Tools* also allows for in-depth analysis of a large number of comments, which is why it is so useful (Quan-Haase and Sloan 2017: 658–659).
8. I also coded requests for Tina's support in finding employment, as well as expressions of gratitude. Irrelevant comments, such as matrimonial inquiries, technical questions or advertisements, were excluded from the analysis.
9. I adopt the 'multinational' concept (Paul and Yeoh 2021), which describes diverse migration patterns across multiple destinations, including temporary stays, aligning well with the Philippine overseas migration context explored in this paper.
10. Popular Filipino respectful ways to call women, used in professional or polite conversations.
11. In Tagalog, this phrase means an expression of respect to an interlocutor.
12. 'Compatriot' in Tagalog.
13. Abbreviation of the word 'you'.
14. Popular abbreviation of the word 'thanks' in online casual conversation.
15. The phrase stands for 'laugh out loud' and is often used to express amusement in response to something funny, particularly in online communication.
16. Different language strategy involving the use of migrants' native languages by migrant vloggers on YouTube to gain their community's approval was described by Zhang and Zhao (2020: 556–557).

17. In the above example, commenters used the Latin word 'salute' to greet others.
18. Abbreviation of the word 'please'.

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Transforming Paths of Integration: Kosovo Albanian Migrants and Their Descendants in Germany and Switzerland

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This paper examines the integration experiences of Kosovo Albanian migrants and their children in Germany and Switzerland, highlighting evolving perspectives across generations. Initially, many first-generation migrants considered their stay to be temporary, thus limiting engagement with integration opportunities. However, economic and political instability in Kosovo spurred family reunifications, reshaping migrants' attitudes towards settling permanently. Drawing on 53 biographical interviews conducted between 2014 and 2016, this study reveals that first-generation migrants often faced challenges with language acquisition, employment, and social integration, which impacted on their sense of belonging. In contrast, their children, benefiting from educational opportunities and wider social networks, experienced a smoother integration process. Economic stability within families enabled this second generation to become bilingual, succeed academically and secure better employment, leading to a stronger attachment to the host society and labour markets. Despite their integration, these younger migrants retain a strong Kosovo Albanian identity and connection to their heritage, balancing personal independence with cultural belonging.

Keywords: Kosovo Albanian migrants, integration, family reunification, generational perspectives, biographical interviews

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Introduction

Differences in the birthplace, age and life stage at which individuals and their children arrive in new countries are crucial factors influencing the adaptation of immigrant families to a new culture (Rumbaut 2004). These variations can significantly affect several aspects of their lives, including language and accent, educational achievements, professional qualifications, social networks and social mobility (Portes and Rumbaut 2001; Snel, Engbersen and Leerkes 2006). For instance, children who arrive at a younger age are more likely to acquire the new language quicker, speak it more fluently and adapt more seamlessly into the education system compared to older children or adults (Hakuta, Bialystok and Wiley 2003). Additionally, age and context of arrival can shape perspectives and attitudes towards both the new and the home cultures, influencing the migrants' ethnic identity and sense of belonging (Erdal and Oeppen 2013; Portes and Rumbaut 2001).

The impact of these factors extends to the maintenance of social networks and the ability to build new ones. Younger arrivals might form friendships and integrate into peer groups more easily, while older individuals might face more significant challenges in expanding their social circles (Ryan, Sales, Tilki and Siara 2008). This, in turn, affects their social mobility and opportunities for advancement in the new country. Furthermore, these differences play a role in determining the likelihood of maintaining connections to their home country over time (Schans 2009), with some individuals fostering strong transnational ties and others gradually losing touch with their place of origin (Vertovec 2004).

To carry out comprehensive research on these dynamics, accurate records of the experiences of first- and second-generation migrants are crucial. This requires a data source that includes detailed information on the respondents' countries of birth and, if foreign-born, their ages and dates of arrival. For native-born individuals, data on the country of birth of their mothers and fathers are equally important for understanding the intergenerational transmission of cultural traits and integration processes (Rumbaut 2004). Such detailed data allow for a nuanced analysis of the intersection of factors that shape the adaptation experiences of immigrant families in multifaceted ways.

In the case of Kosovo Albanians, migration to Western European countries began as early as the 1960s. Initially, they were low-skilled migrant workers with limited education who often sought temporary work opportunities (Iseni 2013; UNDP 2014) and were mostly men from rural areas. They lived with the hope of soon returning home, therefore they continuously sent remittances back home which were used mostly to support the wellbeing of family members and to invest in houses (Gashi 2021).

During the 1980s, an intensive process of family reunification took place, made possible by transforming temporary status into residency permits for migrant men who had been working in Western European countries for many years (Iseni 2013). Additionally, during this time, thousands registered as asylum-seekers fleeing the dire political and socio-economic situation that prevailed in Kosovo in 1989 (Iseni 2013; UNDP 2014). Skilled and educated young men from both rural and urban areas migrated to Western European countries to find jobs, escape political turmoil and poverty (UNDP 2014) and, by sending remittances, improve the quality of life for family members left behind (Gashi 2021).

This trend of migration continued and intensified during the war years of 1998–1999, when the highest emigration peak, composed of asylum-seekers and refugees, occurred (Schwander 2005; UNDP 2014). From 2000 onwards, the motivation for migration evolved as migrants sought better work opportunities and a Western standard of living (Meyer, Möllers and Buchenrieder 2012). During this period, a dichotomy emerged: well-educated young adults went abroad for education and career

development, while unskilled and less-educated individuals continued to migrate (King and Gëdeshi 2024; UNDP 2014). Data from the European Training Foundation (2021) indicate an increasing trend for well-educated young adults, predominantly doctors and nurses, seeking education and career opportunities abroad.

However, it is difficult to gather accurate numbers of Kosovo Albanians residing outside the country – and their demographic and socio-economic characteristics – because the Albanian diaspora is considered new and less institutionalised (Koinova 2011), exacerbated by Kosovo's changing status. Until Kosovo's declaration of independence in 2008, Kosovo Albanians were registered in the receiving countries' statistics, along with other national and ethnic groups of the Socialist Federal Republic of Yugoslavia (SFRY) and the Federal Republic of Yugoslavia (FRY), as Yugoslav citizens. Later, in 2014, the Kosovo Agency of Statistics (KAS) published a report on Kosovar migration based on data collected from counterpart agencies in the respective countries. This report highlighted another challenge in measuring the number of Albanians from Kosovo accurately because detailed immigration statistics in the receiving countries struggle to differentiate between Albanians from different Western Balkan countries –namely individuals from Albania, Kosovo, Macedonia and Montenegro. The KAS still lacks comprehensive statistical data on emigration, resulting in limited information about the Kosovo diaspora: the members' gender, age and reasons for migration (Gashi 2021). Recent studies estimate that the Kosovo Albanian diaspora numbers range from 885,862 (MIA 2021) to around 1 million, comprising a third to half of the total population born in Kosovo (King and Gëdeshi 2024; UNDP 2014). The majority, accounting for 58.1 per cent, reside in Germany and Switzerland, followed by Italy, Slovenia and Austria with 20 per cent. The United States follows with 4 per cent and the reminder mostly live in Scandinavia and Benelux (KAS 2014; MIA 2019).

While there is extensive literature on the Kosovo diaspora and remittances (Gashi 2021; Hajdari and Krasniqi 2021), research on their integration and generational dynamics remains limited. The migration patterns, directions, forms of migration and establishment of permanent residencies in European countries of the Kosovo Albanian diaspora have been the subjects of extensive study but little attention has been given to their integration strategies. This paper aims to illuminate the integration strategies used by Kosovo Albanian migrants residing in Germany and Switzerland, the migrants' 2 primary destination countries (KAS 2014; UNDP 2014). In this study, integration strategies are understood as the actions and choices, both deliberate and situational, which migrants and their families employ to navigate social, economic and cultural inclusion in the host society. These include language learning, educational and employment decisions, as well as engagement in social networks. While some strategies are intentionally pursued, others emerge as adaptive responses to structural constraints. Drawing on established frameworks in integration research (Ager and Strang 2008), this paper analyses these key dimensions of integration not merely as outcomes but as strategic practices that reflect migrants' agency, aspirations and constraints. By treating them as integration strategies, the study captures both the proactive and the reactive forms of migrant adaptation in Germany and Switzerland.

This study therefore examines how Kosovo Albanian migrants and their descendants in Germany and Switzerland navigate the process of integration, with a particular focus on the strategies they employ in relation to language, education, employment and social networks. Specifically, the research explores how integration strategies reflect individual agency versus passive adaptation and how they evolve across generations. Agency is understood here as the capacity of migrants to make purposeful, strategic decisions in response to structural constraints, while adaptation refers to more-reactive or situational adjustments (De Haas 2021). It introduces a comparative lens among first-generation migrants (those who migrated as adults), 1.5-generation migrants (those who were born in Kosovo but migrated with

their parents before adolescence, typically before the age of 12) and second-generation migrants (those born in the host country to migrant parents) (Dolberg and Amit 2023; Rumbaut 2004). The paper investigates the hypothesis that integration strategies vary not only between generations but also within them, especially within the first generation, reflecting differences in the life stage, historical migration wave and intention to settle. By highlighting the contrast between first-generation migrants' limited integration efforts and the more proactive engagement of 1.5- and second-generation migrants, the paper seeks to uncover the intergenerational dynamics that shape integration trajectories and identity negotiation. These domains were selected not only because they represent core dimensions of integration in the existing literature but also because they consistently emerged as central themes in the migrants' life narratives, making them particularly well-suited for analysis through biographical interviews. A notable finding of this study is the internal variation within the first generation itself, with later arrivals, particularly those who migrated after 1989, demonstrating more proactive and long-term integration strategies than earlier *Gastarbeiter* cohorts. This challenges dominant assumptions in the migration literature that often treat the first generation as a homogeneous group oriented primarily toward temporary settlement and limited engagement.

Concepts of immigration and generation

Integration into host societies is a multifaceted and dynamic process that involves both structural conditions and individual agency. In this study, we use the term integration strategies to refer to the practices, decisions and adaptive responses which migrants use to navigate key areas of settlement, such as language learning, education, employment and social relationships. These strategies may be proactive (e.g., enrolling in language classes or pursuing credential recognition) or reactive (e.g., relying on co-ethnic networks due to systemic barriers). Building on Ager and Strang's framework (2008) and integrating recent studies (Astolfo and Allsopp 2023; Giles, Västhaagen, Enebrink, Ghaderi, Oppedal and Khan 2025), this study analyses how migrants engage with these domains through both agency and adaptation. While generations are often used as broad analytical categories, this study also highlights important variations within generational cohorts, particularly within the first generation, based on the timing of migration, the political context and the life stage at arrival. These differences significantly shape the strategies which migrants adopt and challenge assumptions of uniform integration patterns within generational labels. Within this framework, we apply a generational perspective to examine differences in integration strategies. People who have moved from their native regions to other countries as adults are referred to as the first generation (G1). These individuals, having spent their formative years and young adulthood in their country of origin, bring with them strong social networks and ties to their homeland (Rumbaut 2004). They can be less attached to the new country of residence and more prone to eventually returning to their country of origin compared to the second generation (G2) of migrants (Bonifazi and Paparusso 2019).

The 1.5 generation (G1.5) is a unique category encompassing individuals who were born in their country of origin but migrated with their parents before reaching the age of 12 (Dolberg and Amit 2023). According to Rumbaut (2004), these children reached elementary-school age in their native country but emigrated before reaching adolescence and lower-secondary schooling. Their emigration is thus not only a measure of their exposure to a new, often Western, life but also an indicator of the different life stages and socio-developmental contexts they experienced. G1.5 individuals develop bilingual abilities and socio-cultural hybridity. As a result, they have significant experiences in both their country of origin

and their new country, although their ties to the former may be fewer and less close compared to those of G1s (Amit 2018).

In contrast, the second generation (G2) consists of individuals who were born in the country to which their parents migrated (King and Christou 2010). They have grown up in the home environments which previous generations created abroad, integrated into European social networks and typically have not resided in their parents' country of origin. Consequently, they are likely to have fewer close ties to their ancestral homeland than G1.5 or G1 individuals, often integrating into local education and labour markets while balancing dual identities (Klok, Van Tilburg, Fokkema and Suanet 2020).

The third generation (G3) is composed of individuals who were born in the residence country to parents who were also born there (Alba, Logan, Lutz and Stults 2002). Given that G3 individuals and their parents have not lived in their ancestral country, their connection to the origin country is primary symbolic rather than based on direct experiences. As Levitt and Jaworsky (2007) note, G3 can hardly be called 'migrants' because their social connections with the origin country are much weaker compared to those of their parents or grandparents.

This conceptual structure enables the analysis of how integration strategies are shaped by migrants' age at migration, life stage and generational position, providing a more dynamic and nuanced understanding of migrant adaptation process. Each generation's specific experiences and connections to both the country of origin and the host society influence the strategies which they adopt for integration.

In particular, first-generation (G1) individuals, having migrated as adults, maintain strong social networks and many close ties to their homeland. Generation 1.5 individuals, who arrived during childhood, navigate experiences from both their country of origin and their new country but typically maintain fewer ties to their native land compared to G1s. Second-generation (G2) individuals, born in the host country, are shaped by environments created by earlier generations and are more embedded within European social networks, with even weaker links to the ancestral homeland (Klok *et al.* 2020). Finally, third-generation (G3) individuals, born to parents also born in the host country, are often fully integrated into the society of their birth, maintaining primarily symbolic connections to their ancestral origins (Levitt and Jaworsky 2007). Despite the extensive literature on migration patterns and remittance behaviour among the Kosovo Albanian diaspora (Gashi 2021; King and Gëdeshi 2024), there is limited research examining how their integration strategies evolve across generations, particularly through the lens of individual agency and structural negotiation. This study addresses that gap by focusing on strategic adaptation processes among first-, 1.5- and second-generation Kosovo Albanian migrants in Germany and Switzerland.

Factors affecting immigrants' integration into host societies

Immigrant integration into host societies is shaped by interacting factors that present both challenges and opportunities for strategic engagement. According to Papademetriou *et al.* (2009) and recent studies (Astolfo and Allsopp 2023), 4 primary factors significantly affect integration: language proficiency, educational attainment, credential recognition and access to social networks. Each of these factors present unique challenges that can hinder immigrants' ability to fully participate in their new society. However, migrants often respond strategically to these challenges.

Language barriers are often the most immediate and visible challenge faced by immigrants (Gales 2009; McKeary and Newbold 2010). Migrants may respond proactively by enrolling in formal language classes or, more passively, by learning the language informally at work or through social interaction.

Proficiency in the host country's language is crucial for accessing services, employment and education (Chiswick and Miller 2009). Differences in educational attainment influence integration outcomes significantly. Migrants with lower levels of education may face difficulties entering skilled labour markets, yet many engage in strategies like pursuing vocational training or attending night school to improve their qualifications (Dustman and Glitz 2011). Furthermore, even highly educated immigrants often face difficulties in gaining recognition for their foreign credentials (Bauder 2003), which can limit their employment opportunities and professional growth.

The issue of credential recognition remains a major barrier, particularly for highly educated migrants. Immigrants who were professionals in their origin countries may struggle to obtain the necessary accreditation to continue their careers in the host country (Li 2001). This can lead to underemployment and frustration (Guo 2009), as their skills and experience remain under-utilised. They often respond by either pursuing new certifications, adapting to different professions or mobilising ethnic entrepreneurial networks (Bauder 2003; Guo 2009). Social networks provide immigrants with crucial resources such as job leads, housing and community support (Hagan 1998). However, building these networks takes time and effort and immigrants may initially have limited connections in their new country. First-generation migrants initially rely heavily on co-ethnic networks; however, later generations often strategically expand these networks to include locals, colleagues and educational peers (Ryan *et al.* 2008).

Rather than seeing these factors purely as barriers, this study conceptualises them as fields of strategic action, where migrants negotiate, resist or adapt in context-dependent ways shaped by their generation, life stage and socio-economic background. They have differing views on whether first-generation immigrants can quickly make significant gains in wages and employment rates and whether they can catch up with their native counterparts over their lifetimes. Some analysts argue that, with time and support, immigrants can make substantial progress in the labour market (Aydemir and Skuterud 2005; Dustmann and Fabbri 2003), while others believe that the process is slower and more challenging, with persistent gaps in employment and income levels (Chiswick and Miller 2009). The situation often differs for G2s, who typically have higher levels of education and language proficiency compared to their parents (Portes and Rumbaut 2001). Growing up in the host country, second-generation immigrants tend to be better integrated into the labour market, often achieving employment rates and income levels closer to those of the native population (Algan, Dustmann, Glitz and Manning 2010). However, they may still face unique challenges related to identity and discrimination, which have possible effects on their long-term economic outcomes. Studies have shown that the second generation often plays a crucial role in bridging cultural and social gaps, leveraging their bicultural experience to navigate and succeed in both their home- and host-country environments (Aydemir and Sweetman 2007).

Education and income levels significantly influence the ease with which immigrants overcome these barriers. Individuals with higher levels of education tend to have better language skills and professional qualifications and stronger social networks, which facilitate their integration (Dustmann and van Soest 2002). They are more likely to work in their chosen professions, engage in professional development activities and become accepted into social circles of higher socio-economic status (Bourdieu 1986). Additionally, higher income levels enable immigrants to participate in cultural activities and integrate more fully into the social and cultural life of their new residence (Li 2008).

By analysing how Kosovo Albanian migrants engage proactively or reactively with language acquisition, education, employment and social networks, the paper contributes to an emerging literature on migrant agency and strategic integration (Astolfo and Allsopp 2023; Keles 2022). Understanding these patterns of agency is not only academically significant but also has practical

implications for policy and community initiatives. Recognising the strategies which migrants employ highlights the crucial role that policymakers and communities can play in supporting integration processes. By creating targeted programmes for language education, credential recognition and social engagement, host societies can help to remove structural barriers and enable migrants to more fully realise their integration potential. In so doing, immigrants are better positioned to contribute meaningfully to the economic and social fabric of their new countries.

Research design and methods

Research design

This study adopts a qualitative research design, utilising biographical interviews to explore the integration strategies of Kosovo Albanian migrants across different generations in Germany and Switzerland. Biographical interviewing was chosen because it provides a rich, nuanced understanding of personal trajectories, identity negotiations and strategic responses to structural constraints, aspects that are particularly important for examining processes of migrant integration over the life course (Apitzsch and Inowlocki 2000; Rosenthal 2018).

Although the data were collected between 2014 and 2016, the findings remain highly relevant. Migration and integration processes, especially among the first and 1.5 generations, are cumulative and long-term in nature. Patterns in language acquisition, labour-market participation and identity formation observed in earlier stages continue to influence the experiences of the second generation today. Additionally, the study sheds light on the strategic adaptation practices that remain central to current debates on migrant agency and intergenerational integration.

The researcher's positionality is also important to acknowledge. As a member of the Kosovo Albanian community, the researcher shared linguistic, cultural and social ties with many of the participants. This insider position facilitated trust and openness during the interviews but also required a critical, reflexive approach in order to minimise bias in interpreting the narratives.

Data collection

The analysis is based on 53 biographical interviews conducted with G1, G1.5 and G2 Kosovo Albanian migrants residing in Germany and Switzerland. Participants were selected through a combination of purposive and snowball sampling. Initial participants were recruited based on variation in gender, age, migration trajectory and socio-economic background and were then asked to refer others with diverse experiences.

Biographical interviewing was selected over other qualitative methods (such as focus groups or structured interviews) because it encourages participants to narrate their life histories in a relatively open, participant-driven manner. This approach is particularly suited to capturing how individuals experience and respond to integration challenges over time (Rosenthal 2018).

Interviews followed a semi-structured format. Participants were guided by a flexible interview guide which covered key themes, such as migration history, language acquisition, education, employment and social networks but which allowed space for elaboration and personal storytelling. Interviews were conducted in the Albanian language to ensure that participants could articulate their thoughts clearly and express their feeling comfortably; they ranged from 1 to 3 hours in length.

All interviews were audio-recorded, transcribed *verbatim* and handled with strict attention to confidentiality. Participants gave explicit consent for their first names to be used in the study but requested that their surnames and any other sensitive information remain confidential. No pseudonyms were assigned; instead, participants' real first names appear in the text, while any potentially identifying information they wished to keep private was excluded. The researcher ensured that all confidentiality agreements regarding sensitive information were respected throughout transcription, analysis and reporting.

Data analysis

Data analysis followed a thematic approach, combining inductive coding with sensitising concepts from migration theory (Charmaz 2014). Transcripts were imported into MAXQDA software initially in version 14 and then continued in version 24, to facilitate systematic coding and analysis. Initial codes were generated based on recurring patterns in participants' narratives, followed by the development of broader themes related to integration strategies, generational differences and agency versus adaptation.

The coding process was iterative. Initial descriptive codes (e.g., 'language learning efforts', 'credential recognition challenges', 'social network expansion') were gradually refined into higher-order thematic categories (e.g., 'proactive integration strategies' vs 'passive adaptations'). Throughout the analysis, attention was given to variations across generations and gender, as well as the socio-political context shaping integration opportunities.

Data limitations

While the study includes fewer participants from the 1.5 and second generations compared to the first generation, this imbalance reflects the recruitment dynamics and demographic availability at the time of fieldwork (2014–2016), when first-generation adult migrants were more accessible for in-depth biographical interviews. The original research design prioritised the life histories of labour migrants and generational distinctions were not the initial analytical focus. These distinctions became analytically productive only during the coding and interpretive phases, as participants' narratives revealed contrasting integration strategies shaped by age at migration and life stage.

Given this inductive approach, the study does not aim for statistical generalisability. Rather, it explores thematic and strategic patterns within and across generational categories. While the number of G1.5 and G2 participants is limited, their narratives offer analytically valuable insights into evolving integration strategies and generational shifts. These findings should be viewed as exploratory and illustrative, highlighting patterns that merit further investigation with larger and more balanced samples.

Characteristics of participants

The analysis of this study relies on interviews with 53 participants: 43 interviewees were first-generation migrants, 6 were G1.5s and 4 were G2s. The migrants encompassed those with work visas, tourist visas, family reunification visas, those who entered illegally and those who sought political asylum upon reaching their destination. However, by the time of the research, all participants had regularised their status. 15.1 per cent had completed primary education, 45.3 per cent secondary education, 13.2 per cent had earned an associate's degree and 26.4 per cent held a university diploma.

In terms of employment, 35.8 per cent worked in the service and administration sectors, 22.6 per cent in manufacturing, 11.3 per cent in construction, 5.7 per cent in gardening, 3.8 per cent had their own businesses, 15.1 per cent worked in other professions and 5.7 per cent were unemployed at the time of the interview or were retired. The large majority of interviewees were men (79.2 per cent), primarily serving as initiators of labour migration across all emigration waves from Kosovo, while women (20.8 per cent) predominantly migrated for family reunification (see Table 1).

Table 1. Migrant's profile

No.	Participant name	Year of migration	Gender	Age	Profession	Education
Germany						
1	Agon	2007	Male	30 (1.5)	Construction	Secondary school
2	Ardiana	2006	Female	30	Service sector	University degree
3	Valbona	2002	Female	35	Owned business	Secondary education
4	Blerim	1991	Male	46	Manufacture	Primary education
5	Fehmi	1991	Male	41	Manufacture	Secondary education
6	Ekrem	1993	Male	46	Manufacture	Primary education
7	Haki	1993	Male	41	Physiotherapist	University degree
8	Resa	1995	Female	47	Cleaner	Secondary education
9	Ymer	1962	Male	69	Gardener/retired	Primary education
10	Bedri	1993	Male	56	Manufacture	Secondary education
11	Mustafe	1990	Male	43	Construction	Primary education
12	Fatmire	1993	Female	46	Manufacture	Secondary education
13	Rasim	1994	Male	62	Manufacture	Primary education
14	Gyltene	2001	Female	33 (1.5)	Unemployed	Secondary education
15	Egzon	2009	Male	24 (2 nd)	Service sector	Associate degree
16	Agon	1993	Male	45	Manufacture	Secondary education
17	Illir	1989	Male	44	Businessman	Primary education
18	Kushtrim	2006	Male	21(2 nd)	Construction	Secondary education
19	Mislim	1991	Male	50	Service sector	Associate degree
20	Laura	1990	Female	40 (1.5)	Auxiliary lawyer	University degree
21	Afrim	1990	Male	46	Administration	University degree
22	Bajram	1992	Male	51	Service sector	Secondary education
23	Mentor	1992	Male	47	Manufacture	Secondary education
24	Nesim	1992	Male	46	Manufacture	Associate degree
25	Abdylaziz	1995	Male	54	Service sector	Secondary education
26	Drita	1999	Female	30 (1.5)	Administration	University degree
27	Velime	1999	Female	37	Social worker	University degree
Switzerland						
28	Arstije	1985	Female	30 (1.5)	Nurse	Associate degree
29	Fehmi	1993	Male	59	Gardener	University degree
30	Asan	1971	Male	65	Gardener	Primary education
31	Avdyl	1985	Male	30 (2 nd)	Postman	Secondary education

Table 1. Migrant's profile (cont.)

No.	Participant name	Year of migration	Gender	Age	Profession	Education
Switzerland						
32	Ymer	1974	Male	63	Manufacture	University degree
33	Haki	1985	Male	50	Manufacture	Secondary education
34	Fatmir	1968	Male	65	Service sector/ retired	Primary education
35	Sahide	1993	Female	48	Service sector	Primary education
36	Enver	1994	Male	62	Service sector	Associate degree
37	Xhevat	1992	Male	62	Physiatrists	University degree
38	Bajram	1993	Male	55	Service sector	Secondary education
39	Emrush	1992	Male	44	Service sector	Secondary education
40	Ibish	1993	Male	57	Journalist	University degree
41	Basri	1982	Male	55	Service sector	Secondary education
42	Eki	1991	Male	43	Administrative sector	University degree
43	Osman	1983	Male	58	Service sector	University degree
44	Faton	1981	Male	52	Administrative sector	University degree
45	Bejtush	1971	Male	67	Manufacture	Primary education
46	Adem H.	2026	Male	26 (2 nd)	Architecture bureau	University degree
47	Hamdi	1994	Male	56	Administration	Associate degree
48	Valdet	1993	Male	44	Service sector	Secondary education
49	Adem B.	1987	Male	47	Construction	Secondary education
50	Milaim	1986	Male	56	Construction	Secondary education
51	Xhemshir	1981	Male	54	Construction	Secondary education
52	Mirvete	1993	Female	30 (1.5)	Dentist nurse	Associate degree
53	Besarta	2005	Female	31	Unemployed	Secondary education

Results

This section explores the diverse possibilities and practices applied by Kosovo Albanian migrants in Western European countries, particularly Germany and Switzerland. It examines how integration is perceived and pursued across different generations of migrants, especially G1s, G1.5s and G2s, in

relation to language, education, employment and social networks. By analysing these dimensions, the section highlights both continuous and generational shifts in integration strategies.

First generation: temporary migrants and limited integration

The data show that Kosovo Albanians initially migrated to European countries, especially Germany and Switzerland, as temporary workers under the *Gastarbeiter* programme (Goldon, Cameron and Balarajan 2011). Because these migrants travelled in organised groups, foreign-language proficiency was not required for entry into the labour force. Travel arrangements were facilitated, and interpreters were provided (Rass 2023). Within the workplace, teams were often organised by nationality; communication was thus feasible as long as one of the group members spoke the host country's language or a widely understood intermediary language (Caro, Berntsen, Lillie and Wagner 2015). Asan (65, manufacturing, Switzerland) recalled his early experience: 'We didn't know the language, therefore there were some interpreters. At that time, the interpreters were only for Serbo-Croatian or Slovenian languages'.

In addition, no formal education was required. The programme aimed to fill labour shortages in sectors such as agriculture, construction and manufacturing, which demanded physical labour rather than academic credentials (Martiniello 2008). As a result, most migrants were men from rural areas with limited schooling. Ymer (69, retired, Germany) shared that: 'They needed workers and we were all young and ready to work. Our labour power was important and our level of schooling didn't matter. I only have primary-school education'.

While both language acquisition and employment are considered to be core domains of integration (Brown and Bean 2006), for many early migrants these were not pursued as pathways to long-term settlement but, rather, as means to support temporary labour migration. First-generation migrants often viewed their residence in Western Europe as short-term, hoping to return home once political or economic conditions in Kosovo improved. Fatmir (65, retired, Switzerland) reflected on this mindset:

The worst thing of my generation was that we have refused integration here, always hoping we would return soon. We believed something would happen in Kosovo and that we would go back. Therefore, we refused many possibilities regarding labour-market integration. I had a chance to work as a journalist but I refused to integrate. I couldn't believe that would get old here.

This quote captures the regret that many first-generation migrants now express over missed opportunities. Their initial goal was to support families in Kosovo through remittances and to eventually return. However, over time, return plans were postponed indefinitely. Ymer (69, gardener, Germany) did not anticipate spending his entire life abroad. He declined a higher-paying manufacturing job, fearing it would restrict his ability to visit his family. It was not until he approached retirement that he fully acknowledged that he would remain in Germany. In his interview, he stated:

I forgot to mention that, once, I had the chance to switch from gardening to a job in a Mercedes car factory. However, I refused, even though the salary was much higher and there were many other benefits. The problem was that they offered vacations only once a year and I needed to visit my family in Kosovo more often.

The temporary structure of the *Gastarbeiter* programme was designed to address labour shortages by recruiting workers from countries like Turkey, Yugoslavia and Kosovo (Schmid 1983). These

programmes did not prioritise integration, nor require language skills or educational qualifications. However, this structure inadvertently hindered deeper social and economic inclusion. The temporary mindset among first-generation migrants often resulted in minimal investment in language learning, education and career advancement. Over time, many expressed regret at not having made fuller use of the opportunities available to them, highlighting the long-term costs of an initial orientation toward short-term goals. These findings show that the logic of temporary migration significantly limited first-generation migrants' strategic engagement with integration opportunities. Rather than investing in long-term settlement, such as language acquisition, formal education or upward mobility, many pursued survival-oriented strategies focused on remittances and eventual return. This short-term orientation shaped their low engagement with host-country institutions and contributed to patterns of partial or delayed integration. Such experiences echo earlier research that has described *Gastarbeiter* trajectories as structurally constrained and shaped by circular-migration expectations (Schmid 1983).

Language barriers and co-ethnic social networks

Due to the limited need for language skills at the time of their migration, deeper integration into the host society was delayed for many first-generation Kosovo Albanian migrants. As temporary workers, they often lacked access to structured integration programmes that could have supported their acquisition of the host country's language and culture. Consequently, many who continue to reside in Germany or Switzerland today still report only basic language proficiency. Ymer (69, retired, Germany) explained: 'To be honest, I never learned German well. Even now, I am unable to speak fluently. I understand everything but my speaking and reading skills are not satisfactory. I make mistakes'.

This limited language ability significantly reduced opportunities to communicate with locals and form meaningful relationships. Initially – and often exclusively – first-generation migrants developed connections through work colleagues. Friendships with locals were rare and generally remained superficial. Bejtush (67, manufacturing, Switzerland) reflected: 'I still greet them when we meet on the street but I could never really become close friends'.

As a result, social networks were primarily developed with co-ethnics within workplaces and residential areas, reinforcing a strong orientation towards the home country (Caro *et al.* 2015). These migrants relied heavily on their ethnic community for emotional support, practical advice and mutual assistance. They shared experiences, maintained cultural traditions and helped each other to navigate unfamiliar systems. Within these networks, many found a sense of familiarity and cultural continuity in an otherwise foreign context. Ymer (63, manufacturing, Switzerland) noted how these networks grew and became further embedded over time: 'I spend the weekends with Albanians. We are many relatives here. Also, over time our circle has increased through the marriages of our children'.

These findings suggest that co-ethnic networks were not merely fallback options but strategic responses to exclusion and marginality. They provided psychological security and community continuity in the absence of structural support for integration. At the same time, heavy reliance on co-ethnic ties limited broader social integration and reinforced patterns of social segmentation. Without host-language fluency or engagement with formal institutions, many first-generation migrants remained at the periphery of host societies.

This section highlights the fact that early first-generation migrants were shaped by a circular migration logic that discouraged investment in long-term integration. Their decisions were pragmatic and survival-oriented, focused on remittances and short-term employment. Their adaptation strategies, such as reliance on co-ethnic networks, were reactive rather than proactive, reflecting both institutional

neglect and the migrants' own expectations of return. The experiences described here align with the literature on structurally constrained migration (Schmid 1983) and demonstrate how short-term intentions can become long-term exclusion. This stands in contrast to later waves of migrants, whose strategies would evolve toward long-term settlement, as the next section of the paper explores.

Transition to later migrants: The integration of Kosovo Albanian migrants post-1989 – a shift in strategies

Language acquisition efforts and employment adaptation

While the earlier wave of G1 Kosovo Albanian migrants often adopted passive, survival-focused approaches to integration, the cohort who migrated in the late 1980s and early 1990s demonstrated a markedly different pattern. Although still classified as first generation, these later migrants employed more proactive strategies, particularly in language learning, continued education and employment adaptation, indicating a broader shift from temporary survival toward long-term settlement.

Following the abolition of Kosovo's autonomy in 1989, Kosovo Albanian workers were systematically dismissed from public service and socially owned enterprises (UNDP 2014). These political and economic upheavals reshaped the migrant profile. Skilled and educated young men, from both rural and urban backgrounds, migrated to Western European countries to escape conscription into the Yugoslav army and to secure employment (Iseni 2013; King and Gëdeshi 2024; UNDP 2014).

Unlike earlier temporary labour migrants, these individuals approached migration with long-term goals. They actively pursued host-country language learning as a gateway to social and economic integration, recognising it as an investment in future integration. As Afrim (46, post-office consultant, Germany) recalled:

I enrolled in the Goethe Institute in Munich, which was very expensive at the time but was known for its high standards in teaching the German language. I studied there for about 9 months and learned literary German, not just the colloquial language one picks up on the street.

Despite their credentials, many faced significant challenges upon arrival. Their qualifications were often not recognised, leading to underemployment and professional frustration. However, rather than remaining stagnant, many responded by pursuing retraining or additional education to improve their employment status and better integrate into the host society. Xhevat (62, psychiatrist, Switzerland), formerly a doctor and university lecturer in Kosovo, described his adaptation process:

I pursued further education in psychology, specialising in psychological trauma and psychotherapy for couples and families. My workplace funded this training, which lasted three and a half years.

Others, confronted with systematic barriers to credential recognition, took alternative routes to economic stability. Enver (62, service sector, Switzerland) reflected: 'I had my degree in physics and worked as a teacher at a secondary school but they did not recognise it. I had to start all over. Now I am working in a post office'.

These narratives reflect how post-1989 migrants responded strategically to structural constraints. Rather than accepting marginalisation, they invested in host-country credentials, retraining or shifting

career paths entirely. This marks a departure from the circular migration logic in earlier cohorts and demonstrates a turn towards long-term settlement and deeper institutional engagement.

Although these migrants maintained strong co-ethnic ties, their reliance on social networks was not limited to emotional support. These networks served as vital practical resources, facilitating access to housing and employment opportunities and to navigating bureaucratic systems. While the shared cultural background provided familiarity and security, these networks also became functional tools for managing daily life in a new country.

Initially, many in this cohort still viewed their stay as temporary. However, over time, driven by changing life circumstances, economic opportunity and political instability in Kosovo, a gradual transition towards permanent settlement occurred. This adaptive strategy reflects a broader shift in integration logic. Earlier migrants followed short-term, return-oriented strategies; later first-generation migrants embraced more goal-oriented, agency-driven approaches. Through investment in language, education and credential recognition, they sought upward mobility and belonging in the host society. These patterns reinforce the paper's theoretical claim: that integration is not merely shaped by state policy or institutional access but also by migrants' ability to act strategically within, and despite, constraints.

Family reunification, shifting aspirations and investment in children's education

Following the events of 1989, many Kosovo Albanian families initiated family reunification processes, joining relatives already settled in Western Europe. In contrast to earlier migrants, who generally considered their stay to be temporary, post-1989 migrants increasingly envisioned permanent futures in the host country. Political instability at home, labour demand abroad and changes in immigration policy facilitated legal regularisation and reunification (Castles 2006; Iseni 2013). This shift represented not just a legal adjustment but also a transformation in migration logic, from short-term survival to long-term, future-oriented planning. Fehmi (59, gardener, Switzerland) captured this shift clearly: 'We realised that Kosovo would not be the same again. It was clear that we had to build our life here'.

As families reunited and settled, their integration efforts centred increasingly on supporting their children's adaptation. Parents viewed their children not simply as dependents but as central to the family's collective success in the host society. Many enrolled them early in school, prioritised host-country language acquisition and encouraged friendships with local peers as part of a deliberate effort to secure their children's future. Astrije (30, nurse, Switzerland), a 1.5-generation migrant, recalled:

Dad worked hard with us. He pushed us to learn the language by buying different dictionaries, sending us to buy something on our own to learn orientation and inviting Swiss neighbours' children to play in our garden to make friends.

These efforts reflect a form of collective agency, where families engaged in strategic, multigenerational integration planning. Parents understood that success in the host country depended on their children's ability to thrive socially and educationally, an understanding that informed their everyday actions and priorities. Children who arrived at a young age typically adapted quickly, especially through school systems. Drita (30, lawyer assistant, Germany) shared: 'They immediately sent us to kindergarten. I learned German with my peers'.

Importantly, integration did not come at the cost of cultural identity. Many families simultaneously invested in cultural and linguistic preservation. Supported by Kosovo's diaspora strategy (Gashi 2021),

Albanian language schools became important institutions for maintaining national identity. These schools taught not only the language but also history, geography and cultural practices. Egzon (24, city bus driver, Germany), who migrated as a child, explained:

My father sent us to the Albanian language school twice a week. There, we didn't just learn the language but also geography, history, culture, traditional Albanian dance, and many other things. Today, I feel proud when I visit Kosovo and understand everything there. I speak Albanian perfectly.

These practices show how integration and cultural retention were not opposing forces but, rather, dual goals pursued simultaneously through conscious planning. Parents actively positioned their children to succeed within the host society while maintaining a strong sense of ethnic identity, thus reshaping traditional models of integration that assume a trade-off between adaptation and cultural continuity.

For many parents, especially those employed in low-skilled or precarious jobs, education became the principal channel for securing long-term integration. They often expressed a deep sense of purpose and pride in seeing their children access opportunities which they themselves could not. Sahide (48, sales clerk, Switzerland) emphasised this generational strategy: 'I may work a simple job but my children are studying. That's our future'.

This framing of education as a long-term integration investment is key. It reveals how migrant families acted as collective agents, adapting not just in response to immediate challenges but also with an eye towards future stability and mobility. Education served as the site where long-term aspirations could be realised, even if parents had to sacrifice their own career ambitions. Fatmir (65, retired, Switzerland) reflected on his children's achievements: 'Children are integrated. My older son is a manager in an organisation and the younger one is an artist. He has his own art gallery'.

Likewise, Xhevat (62, psychiatrist, Switzerland) noted: 'My son, who came here at 6 years old, benefited the most. Now he is 24 and studying biochemistry at one of the most challenging faculties here, which is considered even harder than medicine'.

These narratives reveal that migrant integration is rarely an individual or linear process. Rather, it is a dynamic, intergenerationally negotiated pathway in which families make intentional investments – educational, social and cultural – to secure a sense of belonging and stability over time. These lived experiences challenge narrow, institutional definitions of integration and support the paper's theoretical argument: that integration must be understood as a dynamic, generational process shaped not just by structural conditions but also by long-term aspirations negotiated across generations.

Perspectives of 1.5 and second-generation migrants: Evolving integration strategies

Language fluency and cultural hybridisation

The integration experiences of 1.5 and second-generation Kosovo Albanian migrants illustrate how early exposure to the host society fosters new forms of belonging, mobility and identity formation. While both groups benefit from educational access and linguistic fluency, their trajectories reflect distinct patterns shaped by age at migration, structural inclusion and evolving perceptions of self. Both groups demonstrated high levels of fluency in the host-country language, though the pathways differed. Mirvete

(30, dental nurse, Switzerland, G1.5) recalled: 'I had to learn German very quickly because I was thrown into school without much help'.

For G1.5 migrants, language acquisition was often an urgent, high-stakes process shaped by sudden immersion in unfamiliar school environments without preparatory support. In contrast, second-generation migrants typically acquired the host-country language from early childhood, through home, schooling and peer interaction, resulting in more-fluid, intuitive bilingualism. Egzon (24, service sector, Germany, G2) noted: 'German is my first language. I only speak Albanian at home with my parents and siblings'.

These differing experiences signal a generational shift: G1.5 migrants actively negotiated bilingualism and cultural boundaries, balancing dual identities through effort and adaptation. Second-generation youth, by contrast, experienced bilingualism as normalised and cultural hybridity as seamlessly integrated into their lives. For them, navigating between their Albanian heritage and their host-society belonging felt less stressful and more like a natural feature of daily life.

Yet, even when linguistic and institutional integration was strong, emotional and cultural identity often remained complex. Laura (40, legal custodian, Germany, G1.5) shared her experience of applying for German citizenship:

When I applied for a German passport, I had to convince them that I was integrated. It was hard for me, born as an Albanian. I emphasised that I am Albanian and belong to the Schwaben neighbourhood where I was born. I told them that, no matter what, I belong to Germany but never feel German.

Such narratives underscore the nuanced and sometimes conflicted nature of identity for 1.5-generation migrants, deeply embedded in the host society, yet not always fully embraced by it. They often feel socially and professionally integrated but cultural acceptance and emotional belonging remain conditional and context-specific. Astrije (30, nurse, Switzerland, G1.5) similarly reflected:

I have spent my whole life here, so I can't feel only Albanian. When Swiss people ask about nationality, they ask which language you think in. I still think in Albanian. Therefore, they always tell me I am Albanian, not yet Swiss. Also, when we apply for a passport, they ask which language do you think and dream in. For me, it's still Albanian.

These reflections reveal that integration is not simply a matter of formal participation or linguistic fluency but also involves a deeply personal negotiation of identity. Even among second-generation migrants, emotional and cultural ties to Kosovo remain strong. Drita (30, lawyer assistant, Germany, G2) summed it up: 'We still go to Kosovo for vacations. However, here in Germany, we have our schools, jobs, friends and family. Home is where the family is'.

These narratives suggest that identity among 1.5 and second-generation Kosovo Albanian migrants is best understood as relational, negotiated and hybrid. While structural inclusion facilitates external integration, internal belonging remains shaped by memory, affective ties and how migrants are perceived and accepted by the host society. These findings support theoretical models that conceptualise integration as a strategic, generational and multidimensional process, where agency is exercised not only in navigating institutions but also in constructing and maintaining dual identities. Rather than signaling incomplete integration, this hybridity reveals adaptive resilience and flexible identity work that allows migrants to belong in multiple cultural worlds simultaneously.

Educational trajectories and employment aspirations

Education emerged as a central pillar of strategic integration for both 1.5 and second-generation Kosovo Albanian migrants. However, their educational experiences were shaped by differing entry points into the host society, varying degrees of familiarity with institutional systems and diverse forms of familial and social support. G1.5 migrants often described their initial difficulties in adjusting to unfamiliar educational systems, dealing with language barriers and adapting to new classroom expectations. Despite these challenges, many emphasised how parental encouragement and personal determination motivated their persistence. Agon (30, construction, Germany, G1.5) recalled: 'I remember feeling so lost at first. But my parents insisted: "This is your chance"'.

For many G1.5 migrants, education was seen as an opportunity to regain or even exceed the professional and social standing lost due to displacement. Academic achievement became a form of strategic adaptation, to enable migrants not only to integrate into host societies but also to reposition themselves socio-economically. Second-generation migrants, by contrast, experienced smoother transitions into the educational system. Having been raised within the host-country school system, they viewed academic progress as a normative expectation. Adem (26, architecture bureau, Switzerland, G2) explained: 'Everyone in my class aimed for university. It was normal'.

These intergenerational dynamics shaped not only how migrants approached schooling but also how they envisioned their professional lives. For both generations, education was not just a requirement but a strategic foundation for social mobility, allowing them to pursue careers in different fields. This proactive engagement reflects a long-term orientation toward integration, moving beyond survival and towards contribution and recognition within the host society.

This section has illustrated how education and employment aspirations intersect as core pillars of strategic integration. G1.5 migrants relied on adaptive resilience and family support to navigate unfamiliar terrain, while second-generation youth benefited from earlier access and normalised expectations. In both cases, education was leveraged not simply as an individual asset but as a generational investment, a bridge toward full societal participation and long-term stability.

These findings reinforce the theoretical framing of integration as shaped by agency, aspiration and structural navigation, rather than passive assimilation. Both generations approached education as a conscious strategy to overcome structural constraints, reposition themselves within the host society and fulfill family-based integration goals.

Conclusion

This paper advances our understanding of the various strategies used by Kosovo Albanian migrants and their descendants in Germany and Switzerland to navigate integration across generations and migration waves. This study was motivated by the limited scholarly attention paid to the integration strategies, rather than remittance behaviour, of the Kosovo Albanian diaspora, especially as they evolve across generations. Drawing on 53 biographical interviews, it investigates how migrants engage with core integration domains, language, education, employment and social networks, not merely as passive participants shaped by policy environments but as strategic actors who adapt, resist and negotiate their inclusion within host societies. The study treats integration as a generationally differentiated and multidimensional process, framed within Ager and Strang's (2008) conceptual model of integration and grounded in theories of individual agency and life-course migration (Portes and Rumbaut 2001; Rumbaut 2004).

By applying a comparative lens across generational positions, early first-generation migrants, post-1989 later first-generation migrants and the 1.5 and second generations, this study fills a key gap in the literature. Existing research has largely centred on the Kosovo Albanian diaspora's roles in remittance economies and migration patterns, while overlooking their integration strategies within host societies. This paper extends that conversation by analysing how these strategies differ not only across generations but also within generational cohorts, based on historical and socio-political contexts.

The findings reveal that early first-generation migrants, particularly those recruited through the *Gastarbeiter* programme, often engaged in passive or survival-based strategies. Integration was limited by their perception of temporary stay, minimal language acquisition and reliance on co-ethnic social networks. While not necessarily a rejection of integration, these migrants' choices were shaped by limited structural support and expectations of return, resulting in under-utilised opportunities for long-term mobility. Their experiences align with classical models of circular migration and demonstrate how temporary migration frameworks shape long-term marginality.

In contrast, later first-generation migrants who arrived after 1989 exhibited notably different, more proactive strategies. In response to systemic displacement and political repression, these migrants pursued host-country language learning, professional retraining and family reunification, with a clear orientation toward settlement and stability. Their actions reveal strategic engagement with integration infrastructures and mark a shift from short-term survival to long-term inclusion. A notable and somewhat unexpected contribution of this study is the identification of variation not only across generations but also within generational cohorts, particularly within the first generation itself. Later arrivals, although technically part of the same generational category, demonstrated distinctly different integration logics than earlier *Gastarbeiter* cohorts. This finding challenges dominant assumptions in the migration literature that treat the first generation as a homogeneous group oriented primarily toward temporary settlement and limited engagement. Recognising such intra-generational distinctions is vital for developing a more nuanced, historically sensitive understanding of integration.

Among 1.5 and second-generation migrants, the process of integration was often facilitated by early or native-born exposure to host-country institutions, particularly the education system. While G1.5 migrants spoke of initial struggles and the need to rapidly adapt, they emphasised educational perseverance and resilience. Second-generation migrants, on the other hand, experienced smoother transitions, viewing educational success and professional ambitions as normalised expectations. Across both groups, language fluency and bicultural identity emerged as defining features. These migrants described navigating dual affiliations with confidence, yet also expressed ambivalence about full belonging, a reminder that emotional and symbolic integration may not always align with institutional inclusion.

What ties these generational experiences together is the presence of both proactive and reactive strategies. Migrants did not uniformly accept structural barriers; rather, they navigated them with varying degrees of foresight, agency and adaptation. Proactive strategies, such as investing in education, acquiring host-country credentials or fostering bilingualism, were particularly evident among later first- and second-generation migrants. In contrast, more-reactive strategies, like relying on co-ethnic networks or informal language learning, dominated earlier migration waves. Yet even these reactive adaptations reflected pragmatic responses to constrained opportunity structures.

By highlighting these strategic distinctions, the paper reinforces its theoretical contribution: integration is best understood not as a static condition or uniform path but as a context-dependent, generationally negotiated and strategic process. Migrants are not merely shaped by the societies into

which they enter; they also shape their own futures through deliberate decisions made across life stages and within families.

This study thus offers a more dynamic and differentiated perspective on integration, with practical implications for both research and policy. It underscores the need for host-country institutions to recognise the diversity of migrant strategies and the long-term, intergenerational investments which many families make in securing inclusion. Future research would benefit from a further disaggregating of first-generation experiences and from examining how socio-political turning points, such as post-1989 migration, reshape migrant expectations and behaviour.

In conclusion, the integration of Kosovo Albanian migrants in Western Europe cannot be captured through singular models or outcomes. Rather, it reflects a spectrum of lived experiences, each informed by history, structure and personal strategy. Attending to these differences deepens our understanding of integration as a negotiated process that unfolds not only across borders but across generations.

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Data availability statement

The qualitative data obtained from this research is not accessible to third parties.

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