

### Proxy Organizations of Local Migration Governance: The Cases of Sultanbeyli and Şişli, Turkey

### Organizaciones intermediarias en la gobernanza de la migración local: los casos de Sultanbeyli y Şişli, Turquía

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#### ABSTRACT

The new structure of international migration in the 21<sup>st</sup> century forces local governments to cope with a range of challenges. Legal restrictions, budget constraints, and social and structural determinants all play a role in cities' response to international migration. Municipalities use an array of strategies to develop responses to immigration and cope with restrictions. While cooperation and collaboration with non-governmental organizations are the strategies of choice for municipalities, in this study, these strategies are analyzed within the context of venue shopping. The role of the Migrant Solidarity Association (*Göçmendd*), supported by Şişli Municipality, and the Refugee and Asylum Seekers Assistance and Solidarity Association (*Mülteciler*), established by Sultanbeyli Municipality, are analyzed. Both organizations are representatives in the Istanbul migration governance arrangements.

*Keywords:* 1. non-governmental organizations, 2. venue-shopping, 3. proxy organizations, 4. Turkey, 5. Istanbul.

#### RESUMEN

La nueva estructura de la migración internacional en el siglo XXI hace que los gobiernos locales se enfrenten a muchos desafíos. Las restricciones legales, las limitaciones presupuestarias y los determinantes sociales y estructurales juegan un papel en la respuesta de las ciudades a la migración internacional. Los municipios utilizan diferentes estrategias tanto para desarrollar respuestas a la inmigración como para hacer frente a las llamadas restricciones. Si bien la cooperación y la colaboración con organizaciones no gubernamentales son las vías preferidas por los municipios, en este estudio estas estrategias se analizan en el contexto de la búsqueda de foros. Se analiza el papel de la Asociación de Solidaridad con Inmigrantes (*Göçmendd*), apoyada por la Municipalidad de Şişli, y el de la Asociación de Asistencia y Solidaridad para Refugiados y Solicitantes de Asilo (*Mülteciler*), establecida por la Municipalidad de Sultanbeyli, ambas organizaciones representativas en los acuerdos de gobernanza migratoria de Estambul.

*Palabras clave:* 1. organizaciones no gubernamentales, 2. búsqueda de foros, 3. organizaciones intermediarias, 4. Turquía, 5. Estambul.

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## INTRODUCTION

The factors shaping administrative approaches to international migration occupy an important place in the literature. Natter (2018) reviews current immigration policy literature, underlining four key factors: 1) the role of socioeconomic interests, interest groups, and local levels operating through the public; 2) the role of foreign policy and diplomatic interests; 3) the importance of potentially conflicting interests of government agencies; and 4) the role of international standards in national policymaking. All these factors vary according to policy levels and the internal dynamics of countries. In European and North American cities, the exclusion of irregular migrants from welfare services, due to national immigrant control systems, has increased the demand for municipal services through funding or non-governmental organizations (NGOs) (De Graauw, 2015; Spencer, 2017). At the same time, local governments can transfer responsibility by funding the work of NGOs (Ambrosini & Van der Leun, 2015; Spencer, 2017).

Turkey has always been affected by international migration movements. But following the massive influx of Syrian immigrants, it has developed institutional and structural responses to manage international migration. One of these has been to establish the Directorate General for Migration Management (DGMM)<sup>2</sup> and to adopt an approach to institutionalize migration management. At the same time, the presence of a large, mobile immigrant population in cities has strained local governments' legal capacity to cope with immigration. Turkey is currently home to the world's largest refugee population. Approximately 4.5 million refugees have settled in Turkey, with 98 percent living in non-camp regions, primarily cities. According to data from the Presidency of Migration Management (2021), Istanbul houses the largest number of refugees in the country.

The literature addressing how municipalities respond to migration locally in Turkey, examines them in various categories (Çamur, 2017; Erdoğan, 2017; Woods & Kayalı, 2017). Danış and Şenol (2019, pp. 56-57) classify the responses of municipalities into four categories: the first refers to "anti-immigrant municipalities," which do not want immigrants or refugee populations within their municipal borders and attempt to restrict their access to certain public services; the second group includes "blind-eye municipalities" which ignore immigrants, pretending they are nonexistent; the third consists of municipalities offering "limited, partial humanitarian aid," while the last group includes municipalities that actively participate in migration management processes and work towards integration and harmony beyond social assistance. It should be noted that the two non-governmental organizations explored in this study are in districts that attempt to undertake the migration governance process in the fourth category. The last two categories usually undertake immigrant-based activities with NGOs and other urban actors. Cooperation and collaboration activities are developed to seek new venues to address the challenges of migrant populations in cities.

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<sup>2</sup> In 2021, due to a presidential decree, the Directorate was renamed the Presidency of Migration Management of the Ministry of the Interior (Presidency of Migration Management, 2021, par. 1).

The search for a new policy venue<sup>3</sup> has been conceptualized within the framework of national policymakers who regard the EU scale as appropriate for policymaking. “Forum shopping (*venue shopping*) involves the strategic selection and use of policy venues by actors to advance their policy goals” (Murphy & Kellow, 2013, p. 139).

While venue shopping refers to shifting the policy area to another venue, particularly in policy areas requiring an immediate response, in this study, the concept of proxy organizations is also included in the analysis while establishing the relationship between municipalities and migration. This is because international migration policymaking, which local governments directly encounter and attempt to address, can usually be developed at another policy level or the same policy level through proxy organizations due to the lack of adequate regulation, resources, and capacity. Proxy means that government programs are managed by network or contracted institutions. Government by proxy has been widely analyzed by scientists since the 1980s. The enormous growth of network management has made the issue of government by proxy important in significant parts of public administration (Kettl, 1988; Salamon, 2001). Public policy appears to be moving towards a universal mainstream approach, particularly in weak policy areas such as immigrant integration, while operating through a proxy (Van Breugel & Scholten, 2020).

The fact that integration policies are not managed holistically in national politics can be seen more directly at the local level. This, in turn, often places immigrants in the substitution category as a means of dealing with the uncertainty over immigrant integration and the lack of future policy. Based on a similar framework, the structure of the two NGOs—*Göçmendd* (GDD) and *Mülteciler*—selected for this study in the Turkish case is also explored. Immigrant integration is not handled as a policy agenda or issue within the main organization and instead is transferred partially or as a whole to a secondary organization, NGOs, with more informal migration governance arrangements (Topal Demiroğlu, 2020). The municipality-NGO interaction in migration governance has often been discussed in terms of the development of the civil space, and the growing importance of the local level in ensuring civic participation and local democracy. However, while the increasing importance of the local level and interaction with NGOs in migration governance has been highlighted, the issue of administration by proxy in responsibility sharing has been overlooked.

The aim of this study is to determine whether the concept of venue shopping in migration policymaking could be a useful framework for understanding local-level strategies and to analyze this claim within the framework of proxy governance literature through the example of two associations in Istanbul. It is argued that the concept used at the EU level can also provide an analytical perspective on migration governance at the local level and contribute to proxy governance literature in the local governments’ application area. After an explanation of the methodology in the third section of the article, the literature on the concept of venue shopping is discussed within the framework of migration governance. In the fourth section, migration

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<sup>3</sup>Venue shopping, a concept that helps explain the effectiveness of the European Union (EU) and the process of Europeanization in international migration governance and migration policymaking,

governance in Turkey is discussed by evaluating the recent literature on non-governmental organizations in the field of immigration. In the fifth section, the role of municipally supported NGOs in migration governance is discussed based on findings from two districts in Istanbul. The conclusion contains the research findings together with suggestions about the future of migration governance.

## METHODOLOGY

The study analyzes the role of NGOs, which municipalities support as part of their search for a venue policy in the field of migration, through the cases of two districts, Şişli and Sultanbeyli, from the perspective of proxy organizations. These two districts were selected based on two criteria: the density of the migrant population and the institutional capacity developed by the municipalities. The fact that Sultanbeyli, one of these municipalities, is governed by the ruling party (AKP) and Şişli by the opposition party (CHP) also influenced the choice of cases to understand two different methods and approaches. The Syrian population living in Sultanbeyli, together with other immigrant groups, make it the district with the largest immigrant population on the Anatolian side of Istanbul. Moreover, registered Syrian immigrants comprise approximately 5% of the Şişli district population. The two selected districts began working with immigrants earlier than other districts, cooperating with NGOs from the outset. Policy documents were examined through the strategic plans and annual activity reports of municipalities between 2014 and 2020. In February and March 2019, six face-to-face interviews with open-ended questions were conducted with the Şişli Municipality Migration Unit Officer, the Sultanbeyli Municipality Deputy Mayor and project coordinators of NGOs supported by municipalities. Interviews were held with the two project coordinators of GDD, supported by the municipality. In Sultanbeyli, interviews were also conducted with two project coordinators of the Mülteciler Association, employed by the Strategic Planning Directorate of the municipality. Field interviews focusing on how and why local responses to international migration differ determined that two municipalities support NGOs by different means and that their visibility in the field of local migration governance varies depending on the scope, intensity, and functionality of this support.

### *Identifying Venue Shopping in Migration Governance*

A policy venue is defined as “the institutional locations where authoritative decisions are made concerning a given issue” (Baumgartner & Jones, 2010, p. 32) and regarded as the access of some people to the policy process and the exclusion of others. Venue shopping refers to the strategy used by policy actors to move between different institutions to achieve their policy goals. The concept, first laid out by Baumgartner and Jones (2010), states that not only interest groups such as residents and unions, but also professional associations and organizations, public and government agencies are strategic actors seeking the best setting to achieve their political goals. If members of these groups are unable to achieve their goals in a specific environment, they can pursue them in more suitable forums. In particular, venue shopping constitutes a strategic attempt to take a policy issue to another level to modify or expand the number of actors involved, the conditions of the policy, or the rules of

the game. According to Pralle (2006), in this process, institutional settings can be used by actors to shape policy-making in three ways. First, an institution's jurisdiction can be expanded or contracted to shape the authority of decision-making inside that specific agent. Those who have traditionally held positions of authority within a venue may attempt to prevent rivals from venue shopping by limiting the jurisdiction of other venues. Second, to effect policy changes, groups may shop for another institutional venue. Third, institutional venues can be used to change the rules of the game, enabling policy alternatives to be opened or closed.

The new policy venue provides a strategic opportunity for non-state actors to choose which state institution can design or undertake the policy, at what level, and even open it up to the participation of interest groups from international organizations. While the main focus here is often the activities of non-state actors, these changes can also be implemented by bureaucrats who change the policy level or engage in key political debates to allow for greater coverage of political conflicts and expedite policy implementation (Bulmer, 2011). National authorities began cooperating with asylum and immigration issues at the European level in the early 1980s, when they encountered local barriers while trying to stiffen immigration controls. These barriers are usually reflected in three areas: judicial restrictions, the activities of pro-immigrant groups and the need for interior ministries to compromise with other ministries in the national legislation-making process (Guiraudon, 2000). According to Guiraudon,

the search for a new policy venue at the EU level has empowered policy makers seeking to achieve their migration control goals by overcoming the barriers mentioned previously. In addition, internationalization or “vertical” policy in immigration control leads to a process of policy making that serves diverse interests by moving policy scrutiny away from national democratic and judicial controls (2000, p. 267).

However, Kaunert and Léonard (2012) revisited Guiraudon's arguments, finding that EU-level cooperation in asylum policy results in better legal standards for asylum seekers and those receiving international protection in the EU, rather than leading to restrictive measures. The view that EU migration governance is now more liberal has also overshadowed the concept of venue shopping at the community level. However, the European migration and asylum governance system is no longer called venue shopping; there are practices and regulations dominated by restrictive, control-oriented policies (Ette et al., 2011). The past decade has seen institutional changes and theoretical revisions challenging the dominant intergovernmental relations regarding the Europeanization of refugee and immigration policies, particularly the areas open to new policy venues (Faist & Ette, 2007). The role of cities in this context came to prominence in regard to both institutional arrangements and academic concerns. International migration has opened up responsibilities that previously rested with national governments to the urban and regional level (Glick-Schiller & Çağlar, 2009). Migration studies focusing on the role of cities have emphasized the “local shift” in migration policy and examined this downward trend whereby cities now play a larger role in multidimensional governance arrangements (Scholten, 2013; Scholten & Penninx, 2016; Zapata-Barrero et al., 2017).

This is not only related to the role of cities in the implementation of certain policies, but also to their position in agenda-setting and policy-making processes in multilevel settings. This is a major constraint against the background of the increasing role of local governments in general and of cities in global and multilevel systems (Brenner, 2004).

Certain factors limit venue shopping. For example, policy makers and advocacy groups may avoid venue shopping when an institution has absolute control over the policy area or problem. However, it should be noted that these factors may differ for each policy venue or area, and that the searches of policy makers and advocate groups may also change. An executive can sometimes draw up regulations that affect policy quickly and sometimes significantly, but the next administration can then ignore all decisions made by previous ones (Pralle, 2003). Likewise, local or provincial governments may have different capacities from national governments to address a policy problem. In this context, venue shopping may not only be functional at the EU level but also at national and urban levels.

As has been seen in various areas at the city level, the most common policy issue where venue shopping has recently been observed is immigration policy. For this reason, municipalities generally choose to provide services in different ways or to come up with answers for this population group, which is suddenly developing and pushing the limits of their legal responsibilities. However, shifting the policy venue does not always mean giving up the entire venue. This change can sometimes involve defining certain roles in cooperation and be an attempt to provide the legal basis for a policy area change. Municipalities have developed a range of initiatives while providing services for immigrants. The first is “involving external actors—who are not duty bound to report irregular migrants—to act as intermediaries between local authorities and migrants” (Delvino, 2017, p. 10). The second is “involve[ing] NGOs in the development and governance of policy and practices in this area” (p. 11). Another strategy adopted by municipalities is “engaging in strategic litigation before international or national courts in order to find a judicial basis for their inclusive practices” (p. 12). Lastly, cities recruit “informal solutions including unofficial internal guidelines that ensure that migrants are not concretely excluded from a service” (p. 13).

Although this is seen as a positive step in achieving policy goals, it has been criticized for reinforcing power relations and completely ignoring participation. Venue shopping has the potential to reproduce certain types of injustice in the distribution of power and resources, particularly in multi-level decision-making processes and policy areas. The ability of different interest groups to be involved in venue shopping strategies depends largely on their ability to mobilize economic resources, produce alternative policy proposals, and not bring the issues of discussion to the public. It also depends on their skill at seeking new policy areas in a way that best suits the nature of the debate and the ideas and methods of the alternatives (Chaqués-Bonafont, 2016). It has been observed that the process of creating new policy areas in the field of urban planning is not used to reduce power differentials in Seattle and Chicago, but rather to reinforce them (Sapotichne & Smith, 2012). This kind of inequality can also feature in the relationship that

immigrants, who are placed in a subsidiary category through proxy governments, establish with public institutions in their country of residence.

### *Non-Governmental Organizations in Local Migration Governance*

Governments have different ways of collaborating with NGOs. These approaches assume different dimensions according to the administrative tradition of the country involved, and the contents of its public policy, financing opportunities and relations with the social sphere. Four types of government-NGO relationships reflect different combinations of institutional interests, policy goals, and preferred tools (Najam, 2000). The first of these involves *collaboration*, when state institutions and NGOs have similar opinions about their desired goals and work together to achieve them. The second entails *conflict*, in which each has the perception of being threatened by the means or actions of the other because the government and NGOs do not share the same goals or intentions. The third implies *complementarity*, whereby each of them strives to achieve similar goals but uses different means of doing so, while the fourth and last one revolves around *consensus* as a relationship in which a potentially temporary and unstable relationship is established and organizations pursue separate goals yet use similar means. In addition to this typology, there appears to be a global trend towards different forms of partnership arrangements in the field of migration. This trend is addressed from a perspective encompassing close collaboration with NGOs in program design and implementation through outsourcing services (Spencer & Delvino, 2019). Cooperation also differs according to the level at which interaction is established. As the local level becomes more active in developing its own policy agendas, as opposed to national policy, it increases its cooperation with non-governmental organizations for a variety of reasons. These include the need for municipalities to learn about immigrant communities or to implement local policy measures (Zapata-Barrero et al., 2017).

Turkey had a fragmented transit migration experience until the mass migration of 2011. The process was triggered by the Syrian war and the humanitarian crisis in Syria causing Turkey to encounter unprecedented mass immigration. This situation elicited reactions, responses, and searches for policies at the international, national, and urban level, forcing public and non-public actors at various levels to cooperate and act together by including different perspectives on policymaking. Until 2013, the management of international migration, which is still dealt with within a secure, centralized framework, was restricted to a centralized policy venue as a security and control issue. Since the establishment of the DGMM in 2013, a more integrated institutional approach has been adopted.

Act 6458 on Foreigners and International Protection contains no regulation on the position of local governments in migration management activities or their role in determining and implementing policy in this field. The second paragraph of Article 104, called Obligations and Powers of the Immigration Administration, states that “The Directorate General is authorised to ensure cooperation and coordination with public institutions and agencies, universities, local governments, non-governmental organisations, and private and international organisations in

relation to its duties” (Law 6458 of 2013, p. 39). However, no direct authority or responsibility has been defined for local governments. The municipalities, which attempted to respond to immigrants immediately at the start of the Syrian migration influx, based their activities on Article 13 of Turkish Municipal Law, which states that “Everyone is a townsman of the town in which he lives” (Law 5393 of 2005). According to this phrase, local governments are expected to provide the necessary services for immigrants residing in local areas. However, since the need to provide service for citizens is stipulated in other parts of the law and in the spirit of the law in general, there appears to be scope for different interpretations of the law regarding migrants. In practice, this pressures local administrators, putting them in a difficult situation, suggesting that the duties and responsibilities of municipalities in migration management should be clearly defined (Ateş, 2020).

Local governments are now the main actors in the local welfare system in an era of intense globalization. As an administrative unit affected by international and domestic systems, they play a key role in national-level social policy practices. This is because local governments are attuned to understanding local dynamics, identifying the needs and demands of residents, and making effective central government policy decisions. As the sphere of activity of local governments narrows, and the distance between them and society decreases, they are thought to be more effective in understanding people’s preferences and reflecting them in public policy (Çitci, 1996). Although this entails risks such as uneven development and a decrease in service quality as localization increases in politics, municipalities are immigrants’ first port of call. According to the Global Compact on Refugees (United Nations, 2018, p. 15), local authorities are “usually first responders to large-scale refugee situations”. The services provided by these departments can be classified into three main categories: 1) cash benefits, 2) in-kind benefits, and 3) planned services for disadvantaged groups (Balcıoğlu, 2020, p. 2). These services are provided for all citizens and used to integrate immigrants into the current system, since municipalities do not receive additional funding from the central government for services they provide for refugees.

To overcome these difficulties, municipalities are working with NGOs in areas such as providing services for immigrants living in cities, social cohesion activities and promoting peaceful coexistence. In response to the Syrian refugee crisis, non-governmental organizations have an effective sphere for managing humanitarian aid and social cohesion across Turkey (Sunata & Tosun, 2018). A typology can be drawn up of NGOs working with migration and emphasizing the diversity of roles within civil society. The categories used are generally related to the broader area of immigration, in advocacy (often focused on a specific area such as human rights) or policy making (such as think tanks). These categories include law and policy enforcement, a network, or umbrella organizations acting as spokespeople for a specific group of people (Civicus, 2016). The position of NGOs in their cooperation with the state on immigration is shaped by the kind of activities NGOs undertake and the level of their scale according to the source of funding. It is therefore important to distinguish between major international organizations (such as the Danish Refugee Council, Doctors Without Borders, WAHA-International Women and Children, Caritas, UNICEF, and the Red Cross), national foundations and small local organizations.



The cooperation and relations between NGOs and state institutions are generally classified into different categories. First, various subsidies, such as services offered by NGOs, are included as part of the support. Second, favorable tax conditions are ensured for NGOs. Third, cooperation between the competent authorities/ministries, working groups and representatives of NGOs takes place at the stages of discussion, study, planning and implementation of the aims and interests of the authorities and NGOs. Fourth, NGOs are exempted from certain mandatory payments or fees. Finally, NGOs are given the opportunity to use the communication and promotion channels of officials and ministries (Prouzová, 2013). NGOs established with the encouragement and support of public institutions should also be included in this classification. Once this has been achieved, they could continue to benefit from one or more of the supports listed above. Since the Syrian migration of the past decade, NGOs have been transformed into organizations that support the state in many fields with their knowledge, field experience and expert staff in coping with the problems faced by municipalities. “As long as the presence of Syrian asylum-seekers in Turkey continues, cooperation between the state and NGOs has become mandatory” (Altunkaynak-Vodina, 2019, p. 1). Considering the municipality-NGO relationship from a different perspective is becoming increasingly important in terms of understanding the role of municipalities in migration governance.

### *Municipally Supported NGOs*

The inclusion of NGOs in the policy venue of local governments to expand governance arrangements in various policy areas, particularly to develop local democracy and various forms of collaboration, is reflected in both academic studies and practice. Local governments must deal with day-to-day affairs in the field of immigration. They tend to adopt a more pragmatic approach than national governments where there is often a high proportion of identity and culture-based debates (Jørgensen, 2012). It is argued that municipalities are more open to pragmatic, efficiency-oriented modes since they face the consequences of migration more directly and earlier than other levels of government (Bosswick et al., 2007). The lack of resources and tools for addressing this issue and the limits of local governments’ responsibility is increasingly leading to partial and short-term solutions to migration-related problems.

In addition to basic needs such as housing, work, health, education, and social life, the local level also encompasses socio-cultural dimensions such as public facilities, and the coexistence of differences. Municipalities can therefore develop a variety of collaborations to be more flexible and expand legal boundaries. To ensure cohesion, cities often use flexible, multi-level mechanisms to coordinate integration measures and share central-level goals. More centralized governments influence the policy venues of municipalities by designing and implementing an approach to local integration. Within this venue, municipalities use the domain of non-governmental organizations. However, merely because a municipality makes several collaborative arrangements or cooperates with a range of partners does not necessarily mean that it operates within a more flexible model. This situation may reflect imbalances in resources and power, as well as the fact that municipalities are choosing the relations and processes they wish to maintain in decision-making mechanisms,

including democratic elements (Nyseth & Ringholm, 2008). For this reason, the notion of flexibility and stretching legal boundaries leads one to question municipalities' role and legitimacy in migration governance.

Delegating a key role to civil society organizations as representatives of the state in the delivery of primary health care and social services, including residential services (Richmond & Shields, 2005) is a key tool for producing local responses to global problems. This strategy is also found in local migration governance as a way for municipalities to support NGOs. In the latter, relations between NGOs and the municipality are developed in the form of proxy organization. There are conflicting views regarding the association between NGOs and social and human administrations. On the one hand, some scholars consider that they are unable to set common transformative goals since they are powerless, heterogeneous, and lack the human and financial assets to advance genuine alternatives (see Olvera, 2003). Researchers have observed that the lack of regulation and control of non-governmental organizations—which were previously within the sphere of official institutions yet transferred to civil society after being removed from public institutions—, as well as the insufficient training of volunteers, may create problems, particularly with vulnerable groups such as children (Righard & Öberg, 2020; Witkowski et al., 2019). Dealing with the immigration phenomenon as a proxy issue shows that those concerned about cooperation have a point, and it remains unclear who is responsible for social integration and social services.

In Turkey, municipalities do not have an allotted budget or legally defined resources for refugees. The budgets of district municipalities are determined by the number of citizens living within the boundaries of the district each year, which does not include refugees. At the same time, the number of unregistered immigrants living in cities means that the population is much larger than the amount of people municipal budgets are intended to serve. Research conducted with all local Istanbul governments in 2017 found that municipal and district governorship officials used their allocated budgets alone to help Syrians in their districts. Additional resources are mostly tied to aid or outsourced project-based activities. Since local governments mainly use their existing budgets for social services, cooperation with NGOs paves the way for local governments to assist refugees and international migrants (Woods & Kayalı, 2017). Integrating refugees into existing social service infrastructure is by no means straightforward for municipalities. Under the current system, municipalities do not receive additional cash from the federal government for services provided for refugees. To avoid legal and administrative obstacles, an association or NGO provides logistic support by establishing a refugee center, within the framework of a protocol signed with the municipality (Eliçin, 2018).

In this context, the Refugees Association, established by Sultanbeyli Municipality, and the Migrant Solidarity Association, whose activities are conducted within the framework of a protocol with the support of Şişli Municipality, are considered examples of venue shopping at the local level. These two associations were established to overcome the difficulties faced by municipalities in matters such as the needs, demands and rights of refugees, and international migrants in urban life, which are not directly addressed in municipal legislation.

The extent of municipalities' need for external support to achieve these goals and the way they manage it, shapes the structure and scope of governance arrangements. Sultanbeyli Municipality sought outsourcing with an association established directly through its personnel and was acting as the spokesperson of both actors in a single institution: the Migrant Solidarity Association, established on the initiative of Şişli Municipality, which conducts its activities in cooperation with the Migration Unit of the municipality.

#### *Şişli-Immigrant Solidarity Association (GDD)*

Şişli, one of Istanbul's western/European districts, comprises 25 neighborhoods. The area's first settlement, erected in the 16th century, is thought to have been Tatavla, now known as Kurtuluş. The dynamism created by the military barracks built in the 18th century played a major role in the development of the district. Following the reforms of the Ottoman Empire in the Tanzimat Decree of 1839, the Latin Levantines from Europe also preferred these places. After the establishment of the Republic of Turkey, the democratic structure of Şişli began to change and Şişli developed northward, driving village-to-city migration in the 1950s. In the 1980s, its Halaskârgazi, Rumeli, and Valikonağı streets were also among the most important shopping districts in Istanbul. The area—predominantly occupied by Christian and Jewish settlers before 1980—welcomed immigrants from Iraq and Bulgaria after 1980, and from Iran, Iraq, and Syria after 2000. Over the past two decades, it has continued to receive immigrants and experience different types of migration. Şişli is home to groups of people from several parts of the world, such as Africa, Uganda, Egypt, Nigeria, Iran, Iraq, Azerbaijan, and Uzbekistan. At the same time, a new study has shown that the residents of the district are proud that despite all these differences, there are no major social tensions (Şar & Kuru, 2020). Şişli Municipality has been governed by the opposition party (CHP) for a long time and is known for its cultural events and high living standards.

The interviews conducted with the two project and social service coordinators of the Immigrant Solidarity Association explored the activities of the association concerning migration and diversity, the cooperation it engaged in while undertaking these activities, its approach to the immigration issue, and its contributions to the policy-making process. Another interview was held with one of the social service experts in the Şişli Municipality Migration Unit within the same framework.

The Immigrant Solidarity Association (GDD) was established in October 2016 to contribute to the solution of the everyday problems of refugees living in Istanbul and to enable them to benefit from public services. That same year, the Refugee Counseling and Support Center was launched in conjunction with Expertise France and Şişli Municipality. Providing professional advice on access to health and education services, justice and socio-economic support mechanisms, the Migrant Solidarity Association operates within the framework of human rights. Since September 2018, Şişli Municipality has implemented a protection and support project together with the European Civil Protection and Humanitarian Aid Operations (ECHO) and Welt Hunger Hilfe (WHH) (Migrant Solidarity Association, n.d.).

The support provided by Şişli Municipality has been reflected in the activities, and the Şişli Municipality logo is used in all visual documents such as the activity posters, brochures, and announcements of the Association. The services provided by Şişli Municipality and the Association for Immigrants are designed to meet the basic human needs of refugees, conditional refugees, asylum seekers, immigrants, stateless people, those seeking temporary asylum, those who can be granted secondary protection status, and those requiring international protection, such as food, shelter, health, education, and work. In addition, the «Social Kitchen in Şişli» project, implemented in 2020, is designed to provide hot meals for those in need in Şişli, to provide culinary skills training, and to prepare immigrants for employment. It has developed priority areas in terms of women's participation in social life, creating intercultural platforms where local people and Syrian and other immigrants can come together, and providing services for vulnerable groups on issues such as health care access and employment.<sup>4</sup>

At the same time, the interviewed association officials noted that “Şişli Municipality covers some of the rent and expenses of the GDD. We enjoy privileged status within the framework of the protocol” (GDD expert, personal communication, February 27, 2019). They remarked that the municipality is an important actor in implementing the activities of the Association and that this type of cooperation with NGOs is not common in municipalities. The specialists from the Association summarized their activities as “What we do is a strengthening activity—to make them visible in the public space” (GDD expert, personal communication, February 27, 2019). The municipality's direct empowerment of immigrants may become impossible for various reasons such as the reaction of local people, relations with the central government, the restriction of local politics shaped by party politics and policy interaction.

While proxy organizations may make the public needs of a vulnerable social group visible and facilitate their interaction with the state, unfortunately, they do not necessarily empower them. The solutions found to cope with all these restrictions show that two different ways of doing business and working together can be implemented at an appropriate scale through venue shopping. One example was provided by the official in Şişli Municipality:

We would be very powerful if this was seen as something that must be done. We can do things if there is a budget. Still, the NGO contributes a different perspective and modifies the understanding of municipality, shifting it from the idea that “I am only supposed to serve the people of the region.” If there was a budget, we would still work with NGOs because we would be stronger. But right now, there is an area where we only focus on NGOs. If they back out, what we can do as a migration unit will be very limited (GDD expert, personal communication, February 27, 2019).

By circumventing all these risks, the municipality strategically responds to the adaptation and service demand needs of international migrants, to a certain extent. The emphasis of the officer that

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<sup>4</sup> For a detailed account of the services provided by the Migrant Solidarity Association, see <https://gocmendd.org/en/project.html>. For a detailed account of services provided by the Social Services Department of Şişli Municipality, see <https://www.sisli.bel.tr/hizmetlerimiz/-sosyal-destek-hizmetleri/>

the municipality's actions are limited shows that venue shopping not only serves to achieve policy results but also to construct a more inclusive policy. However, the inclusiveness and monitoring of this design process remain controversial. When the municipality is “powerless” or “does not want to be visible” in encouraging other institutions and delivering specific information to the local area, the association plays a crucial role as a proxy service (GDD expert, personal communication, February 27, 2019). Thus, while the municipality cooperates on an issue it is attempting to resolve in its policy area, it avoids voters', politicians,' and the country's agenda in general, ensuring that proxy organizations come to the fore. For instance, in Sultanbeyli, which is governed by the ruling party, the seven-story building of an association working solely with refugees enjoys public approval despite the various debates in the district.

However, this representation is unlikely to be achieved in Şişli, which is ruled by the opposition party, whose main agenda regarding migration policy is to return Syrians, for both political reasons and because they are wary of the reaction of local residents. It is worth noting that the official from the Şişli Municipality Immigration Unit described this as “keeping the balance.” “For example, we cannot operate in a seven-story building here. It would be difficult to find such a building anyway, and the people in our district might not accept this” (GDD expert, personal communication, February 27, 2019). However, municipalities act as facilitators for associations, as it is difficult and legally impossible for a local association to shoulder the entire burden of the refugee issue alone. In this respect, one can say that venue shopping works bilaterally due to this privilege granted to the NGO. Civil organizations can present more persuasive arguments to local authorities as they are more likely to be seen as credible and impartial. As the official stated, “When we look at the meeting of at least one municipality, we can see that there is recognition and acceptance of the work done; it does not pose any obstacles” (GDD expert, personal communication, February 27, 2019).

By shifting the view of local people belonging to minority communities as a fragile population to regarding them as refugees and the activities conducted by the association as a reflection of the cosmopolitan structure of Şişli, the Migration Unit of the municipality paves the way for its activities. Immigrants who apply to the municipal immigration unit for basic needs and assistance must have proper migration documents. However, being a registered immigrant is not pre-condition for those consulting or applying to GDD.

#### *Sultanbeyli: Refugees and Asylum Seekers Assistance and Solidarity Association (Mülteciler)*

Sultanbeyli became the gateway to Istanbul following the conquest of Istanbul by the Ottoman Empire. The region, which acquired village status after the settlement of Turkish immigrants from Bulgaria in 1945, continued to grow, especially because of the increase in village-to-city migration in the 1950s, which distinguished Sultanbeyli from other districts for a long time. The residents, most of whom had migrated from poor, rural areas to the city, sought to preserve the traditions and cultures of the population attempting to live in the city (Işık & Pınarcıoğlu, 2012). Although most of the foreign population who came to the district in the 2000s were immigrants from Iraq and Afghanistan; after 2011, the Sultanbeyli district attracted Syrians because it offered a familiar lifestyle to those

who had fled the civil war in their homeland (Kaya, 2020). Sultanbeyli Municipality has been governed by the ruling party (AKP) since it was founded as a district.

Sultanbeyli, one of Istanbul's economically weak districts, is home to a large, influential refugee community center established in 2014. The unit responsible for managing and coordinating refugee services in Sultanbeyli Municipality is the Strategy Directorate. Although the Strategy Directorate had no previous experience in this field, it reported that in addition to its institutional capacity such as collaborating with NGOs, researching, and data collection, its expertise in establishing and maintaining relations with international organizations has also contributed to creating its own unique approaches and organizational models (Eliçin, 2018). The Syrian population living in the Sultanbeyli district accounts for approximately 6.83% of the district population. This is one of the best districts in Istanbul regarding the scope of services provided for refugees.

Refugees and Asylum Seekers Assistance and Solidarity Association was established in 2014 in order to seek solutions to the problems of people who have left their country and need international protection. RASAS supports refugees in need with its staff consisting of different nationalities.

Our institution, which is called the Refugees Association for short, carries out its activities without any discrimination based on reasons such as language, religion, race, gender, age, disability, political opinion differences. We work in cooperation with private sector organizations, non-governmental organizations, and public institutions to support the elimination of all vital needs, specially the main problems of refugees, and to ensure their rapid adaptation to society (Refugees Association, n.d., par. 1-2).

From the association's own statements and the statements made by the interviewee, "We do everything to do with refugees," we can infer that the association goes beyond social assistance (expert from Mülteciler Association, personal communication, March 2, 2019). The services provided by the Association for Syrian Refugees in the district of Sultanbeyli include the following: social services, protection unit, physical and mental health, physiotherapy services, legal counseling, psychological counseling and guidance, job and vocational counseling, work permits and licensing, child-friendly spaces, Turkish language training, vocational courses, social cohesion activities, refugee councils, schooling, kindergarten, women's shelters, the hospital appointment system, emergency basic needs service, a call center and family early childhood guidance service.<sup>5</sup> Based on the association's own representation, the municipality plays a visible role in the policies and activities of the association. There is an emphasis on cooperation on almost all activities in the field of refugee and migration. Although the management and core staff of the association consist of municipal bureaucrats, the institutional visibility of the municipality does not appear in the activities.

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<sup>5</sup> For a detailed of the services provided by the Refugees Association, see <https://multeciler.org.tr/eng/>

Since the municipality is known to conduct all operations and procedures related to immigration and refugees through the association, no separate strategy was developed by the municipality. As one of the interviewees noted: “We have an operational function that can provide solutions for almost all the problems of a refugee who comes through the door” (expert from Mülteciler Association, personal communication, March 2, 2019). Managing this process with a proxy organization, which would only be able to provide services to documented immigrants in certain areas if it remained within the legal obligation of the municipality, allows more positive, inclusive migration governance. However, when asked how sustainable this process would be without the help of an NGO, the interlocutor said, “We are not worried about the future; we have set up a good system” (expert from Mülteciler Association, personal communication, March 2, 2019). This view is linked to the fact that it is not regarded as necessary to define the direct authority and role of cities and municipalities in migration governance. The migration governance model developed by the association is a unique one. It is a collaboration model with the association at the center, in which local, national, and international actors are involved. This picture is also confirmed by the following remarks by the project coordinator:

We also implement migration management policies through the association. There is a great deal of cooperation with many institutions. We want to involve all the stakeholders in the field: schools, district governorship, imams, and local NGOs. We also cooperate with international organizations (expert from Mülteciler Association, personal communication, March 2, 2019).

Although the term “we” refers to the association in terms of visibility, it also refers to the municipality in terms of capability. Because, as noted by the experts in the association, “good relations with the Immigration Administration and the central government” are closely related to the administration of Sultanbeyli by the ruling party (expert from Mülteciler Association, personal communication, March 2, 2019). Changing the policy venue here became possible as a result of the lobbying activities between the local population and the center, which was facilitated by these close relations. For instance, the Anatolian Side Directorate of the Immigration Management, representing the central government in the province, operated in the association building for over two years. The spatial representation of the center-local coordination has therefore also become visible. Moreover, through personal efforts and mobilizing various connections with the economic and political elite, they were able to obtain a fingerprint machine for use at the Sultanbeyli District Police Department to expedite the registration process of Syrians in Sultanbeyli (Danış & Nazlı, 2018).

The process began with the first wave of immigration from Syria in 2011, with the collection of humanitarian aid from the local population and its distribution to refugees in need. It reached a turning point in 2016 with the transfer of funds from international funding organizations. It took approximately eight months to establish the first contact with international organizations, for which persuasion was required. This is fully compatible with the analogy of institutions and institutional bureaucrats coming to the market and venue shopping. It can also be analyzed from a

venue shopping perspective. Because, as Pralle (2003) points out, strategic political actors seek venues both to achieve substantive policy goals, and send messages to their members and the public, and to please partners.

It is easier for non-governmental organizations to access funding sources or apply for projects than a local government authority. The building housing the association, which can reach this source relatively easily, serves as a brick-and-mortar showcase of Sultanbeyli's refugee policy. In a recent study comparing local responses of municipalities in Istanbul, the authors note that the interviewees said that there was a regular flow of visitors from donors, NGOs, and other municipalities. The role of international funds in local immigration policy was reflected in eye-catching signage, logos inside and outside, and brochures and leaflets (Lowndes & Karakaya-Polat, 2020).

The association has achieved an activity level that transcends district borders, thanks to the knowledge, recognition and, of course, the adequacy of funding sources. It also cooperates with beneficiaries from outside the district and other municipalities governed by the ruling party. A predominantly outward-oriented service for district municipalities located on the Anatolian side of İstanbul was mentioned: "The other important point of cooperation is capacity. When we first started working, we knew nothing. Creating a model, developing capacity, developing a project, turning it into a policy. We have developed all of these by learning from others" (expert from Mülteciler Association, personal communication, March 2, 2019).

In particular, the fact that all the activities for refugees are implemented by the association, not by the municipality, but by an NGO and a network and institutions formed around this NGO, reduces the burden on the municipality in terms of urban harmony. Refugees apply to the association for all their needs. It has been reported that the association is expected to solve many problems that exceed municipal legal boundaries such as helping relatives of refugees to cross the border safely or enabling an undocumented migrant woman to give birth. The fact that the Syrian community calls the association Beled-i Syria (Syria Municipality) should be included in this narrative. Within this framework, one can see that an initiative developed to overcome legal limitations and the lack of municipal resources has already exceeded its objective. One of the interviewees stated that "the municipality now leverages the association's resources and the competence of its staff" (expert from Mülteciler Association, personal communication, March 02, 2019). In this respect, the association, which is a good example of venue shopping, has also exceeded the conceptual boundaries of an NGO.

## CONCLUSION

Municipalities play a crucial role in immigrant integration, service provision, and managing the expectations of refugees in cities. Involving NGOs in the policy development and implementation phases provides opportunities to strengthen policy design by incorporating NGOs' experiences into the policy options considered and increasing citizens' and immigrants' co-participation in democratic processes. In this study, the role of NGOs in local migration governance is analyzed



through the conceptualization of venue shopping. By examining two examples from Istanbul, it is argued that making local NGOs the sole authority on refugees puts NGOs in the position of proxy organizations, entailing the risk that immigration and migration governance will remain in the background for public institutions.

The importance of the two cases discussed in this study is not only due to the interactions of NGOs with immigrants, the services and activities they perform, and their relations with the municipality in migration governance, but also the municipality's role in the establishment and survival of NGOs. NGOs supported by municipalities are key actors for municipalities, enabling them to overcome legal constraints and also to create a future vision for migration governance. The most prominent area of this actor's role would appear to be service provision for refugees for urban life. In this way, NGOs often expand the range of services a municipality can provide for its citizens.

Streamlined cooperation by actors at the local level in migration governance can only be achieved by determining the role and authority of each actor and creating a robust strategy for the future. Although venue shopping at the urban level contributes significant experience in the field of migration and participation in the policy-making process, the policy regarding this situation should be followed closely. Venue shopping, a vital strategy for overcoming legal, social, and structural restrictions, also involves the establishment of proxy organizations. Thus, immigration policy, an area where flexibility is provided, means that the role of local governments as public organizations in migration governance will remain uncertain, as long as it is handled as a means of proxy.

The method of supporting NGOs through venue shopping which can be considered an important step for municipalities to become a formal and authorized actor in migration policy, entails certain risks in terms of their visibility in the formulation of these policies and the long-term role of cities. These include the risk that the issue of immigration at the local level will be handled by NGOs with a *temporary* method and that migration management will remain limited to the central government. Due to the relatively easy access of NGOs to funds and the acceleration or reduction of the bureaucratic process, immigration and integration policy continues to be considered as a project-based issue in a new policy venue opened by the NGOs. The last issue remaining unresolved in this venue shopping method is the uncertain role of municipalities. The continuation of the local response to the migration process through their association as proxy organizations may prevent both the clear definition of migration policy and the role of municipalities in this issue in the future.

As a result, migration governance at the local level should be more clearly defined and municipalities should have more specific, statutory mandates in migration governance. In this way, the municipality-NGO relationship could be established more democratically and institutionally, and the institutionalization of migration governance and the policy-making process could become sustainable.

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