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## Implementation of Temporary Protection Policies for Syrian Refugees in Turkey and Ukrainian Refugees in Italy 2022-2025: A Comparative Study

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### Kata Kunci :

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### Abstrak

Studi ini menganalisis implementasi kebijakan Perlindungan Sementara dalam merespons meningkatnya arus pengungsi lintas batas, dengan fokus pada Turki dan Italia periode 2022–2025. Penelitian ini bertujuan untuk memahami bagaimana perbedaan sistem kebijakan memengaruhi efektivitas perlindungan dalam menjamin hak pengungsi dan mendukung integrasi. Pendekatan kualitatif komparatif digunakan dengan kerangka Comparative Public Policy (CPP) Matt Wilder, yang menekankan peran konfigurasi Institusi, wacana kebijakan, ide dan norma, serta budaya politik. Hasil penelitian menunjukkan bahwa Turki mengadopsi sistem nasional yang terpusat dan pragmatis, memungkinkan respons cepat namun dengan kepastian hukum dan integrasi jangka panjang yang terbatas. Sebaliknya, Italia beroperasi dalam kerangka supranasional Uni Eropa melalui Temporary Protection Directive (TPD), yang memberikan perlindungan lebih stabil dan berbasis hak meskipun menghadapi tantangan koordinasi. Studi ini menegaskan adanya trade-off antara fleksibilitas kebijakan dan stabilitas perlindungan, serta menunjukkan bahwa efektivitas kebijakan lebih ditentukan oleh sistem kebijakan publik daripada semata pertimbangan kemanusiaan.

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### Keywords :

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Refugees, Turkey, Italy

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### Abstract

*This study analyzes the implementation of Temporary Protection policies in response to the increasing flow of refugees across borders, focusing on Turkey and Italy for the period 2022–2025. The research aims to understand how differences in policy systems influence the effectiveness of protection in guaranteeing refugee rights and supporting integration. A qualitative, comparative approach is employed, using Matt Wilder's Comparative Public Policy (CPP) framework, which emphasizes the role of institutional configurations, policy discourses, ideas and norms, and*

*political culture. The results show that Turkey adopts a centralized and pragmatic national system, enabling a rapid response but with limited legal certainty and long-term integration. In contrast, Italy operates within the supranational framework of the European Union through the Temporary Protection Directive (TPD), which provides more stable and rights-based protection despite challenges to coordination. The study highlights the trade-off between policy flexibility and protection stability and suggests that policy effectiveness is determined more by the public policy system than by humanitarian considerations alone.*



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## INTRODUCTION

The phenomenon of migration and displacement has become one of the complex global challenges, along with the ever-changing dynamics of international politics, economics and security. This large-scale population displacement can no longer be seen as a purely local or regional problem, but has developed into a cross-border human security issue that demands collective attention and responsibility from the international community. In facing this reality, every country is faced with a dilemma between carrying out its moral obligations and international law on the one hand, as well as maintaining national interests and internal stability on the other. This complexity shows that the refugee issue not only reflects the humanitarian dimension, but also serves as a benchmark for the extent to which the principle of global solidarity can be implemented in a real and just form of public policy.

As a region that is often the main destination for cross-border refugees, the EU faces major challenges due to conflicts in the Middle East, Asia and Eastern Europe. To respond to the situation, the European Union formed a Common European Asylum System (CEAS) to standardize procedures, acceptance standards, and the division of responsibilities among member countries (Wahlbeck, 2022). One of the key instruments is Temporary Protection Directive (TPD), an emergency policy that regulates the issuance of one-year temporary residence permits by EU member states, including access to employment. However, this policy was only activated for the first time in 2022 during Russia's invasion of Ukraine. (Vitiello, 2022)

Outside the framework of the European Union, Turkey ranks as the country with the largest number of refugees in the world with 3.6 million Syrian refugees, especially since the outbreak of the Syrian conflict in 2011. (Sahin et al., 2020) As a transit country as well as a final destination, Turkey is faced with complex challenges in managing large-scale refugee flows. In contrast to the European Union system, which operates through supranational mechanisms, Turkey operates through a national system through law No. 6458 on asylum and migration, which is the basis for the establishment of the regime temporary protection. This scheme provides protection without full recognition as a refugee as provided for in the 1951 convention (Gökalp et al., 2020). This situation reflects the character of the policy Temporary Protection in

Turkey which is domestic and adaptive, but also limited by institutional capacity, resources, and socio-political dynamics at the local level (Gibárti, 2021). Meanwhile, Italy as a member of the EU is in a more institutionalized system, where the implementation of Temporary Protection based on results Temporary Protection Directive (TPD).

The comparison between these two contexts presents an interesting analysis. On the one hand, Turkey represents a national approach that is pragmatic and situational, while Italy operates under a more formal and structured supranational legal system (Wahlbeck, 2022). Both seek to address the same challenge, namely how to protect refugees in emergency situations without sacrificing internal stability. However, there is a gap in the literature that discusses the effectiveness of policies Temporary Protection in both countries, especially in a comparative perspective. Most previous studies examined Temporary Protection From a purely normative and political perspective (UriArte, 2023), without doing cross-country comparisons. This study emphasizes the importance of comparative analysis to see how differences in institutional design and political context affect policy implementation Temporary Protection, both within the supranational framework of the EU and in the national system as applied in Turkey.

In line with that, the main objective of this study is to analyze in depth how Temporary Protection policies are implemented in Turkey and Italy, as well as assess the extent to which these policies are able to guarantee basic rights and support the refugee integration process. By comparing the effectiveness of policies in two different contexts, namely the domestic protection regime in (Turkey) and the supranational protection mechanism of the European Union (Italy). This comparison not only highlights differences in policy design and implementation, but also opens up space to test whether temporary protection can serve as a bridge between the need for immediate protection and sustainable asylum governance in various political and institutional contexts.

Based on the literature review, there are clear research gaps in the study of Temporary Protection policies. First, studies of the Temporary Protection Directive (TPD) are still dominated by normative and political analysis, particularly regarding the policy's activation process, without adequate attention to the implementation dimension at the national level (UriArte, 2023). Second, studies on Turkey tend to emphasize aspects of discourse and state sovereignty, particularly through narratives such as guesthood, but have not comprehensively linked these to institutional configurations and their implications for refugee protection outcomes (Abdelaaty, 2021). Third, although comparative studies are emerging, existing research has not been able to systematically integrate the interactions between key public policy variables such as institutions, discourse, ideas, norms, and political culture into a coherent analytical framework (Fatima et al., 2022).

To address these gaps, this study employs a qualitative comparative approach

using Matt Wilder's Comparative Public Policy (CPP) framework. Focusing on four key dimensions—institutions, policy discourse, ideas and norms, and political culture—this study analyzes the implementation of Temporary Protection policies in Turkey and Italy and evaluates their effectiveness in guaranteeing fundamental rights and supporting refugee integration. Through this approach, the research demonstrates that variations in policy outcomes are not solely determined by humanitarian considerations, but rather by differences in the underlying public policy systems. Thus, this study provides empirical and theoretical contributions to the development of refugee governance studies and offers insights for improving emergency protection mechanisms in various political contexts.

## **METHODS**

This study uses a comparative qualitative approach to analyze the implementation of Temporary Protection policies for refugees in Turkey and Italy in the period 2022–2025 (Matthew B. Miles, A. Michael Huberman, 2014). This approach was chosen because it allows for an in-depth exploration of the differences in policy configurations, implementation practices, and institutional and political contexts that shape the refugee protection experience in each country. Instead of measuring policy quantitatively, this research focuses on understanding the process, meaning, and implications of policy as a public practice.

The object of this study is the implementation of temporary protection policies in Italy and Turkey which focuses on how these policies are implemented and how effective they are in guaranteeing the basic integration rights of refugees. In addition, this study also compares two policy models, namely Temporary Protection (Turkey) and Temporary Protection Directive (Italy).

The author will use data collection techniques such as literature studies (Library research) and secondary data to obtain the necessary data. Literature study is a data collection technique using a number of literatur such as scientific journals, books, websites, E-books, newspapers and data from various official documents and others. In this research, the Miles and Huberman model is also used to identify data analysis which consists of three main stages: Data redaction, Data presentation, and Conclusion drawn.

## **Historical Background Of The Implementation Of Temporary Protection In Türkiye And Italy**

The influx of Syrian refugees into Turkey since 2011 marked the beginning of significant policy pressures stemming from cross-border conflict. The initial, relatively small influx quickly escalated into a mass influx, forcing the Turkish government to respond with an Open Door Policy as an emergency measure to guarantee entry and basic protection (Larasati et al., 2025). From a Comparative Public Policy (CPP) perspective, this policy reflects an institutional response to an exogenous shock, where external pressures drive the state to take pragmatic measures influenced by regional

solidarity norms and domestic political considerations. As the number of refugees increased, Turkey then established a legal framework through Law No. 6458 (2013) and the Temporary Protection Regulation (2014), and established the General Directorate of Migration Management (GDMM) as the primary institution (Açıköz, 2014). However, despite its centralized and responsive nature, this policy remains influenced by domestic political dynamics, resulting in a flexible but unstable nature of protection in the long term (Daniel Drewski, 2024).

In Italy, the development of Temporary Protection is inseparable from integration within the Common European Asylum System (CEAS), which has driven a shift from a fragmented domestic approach to a multilevel governance system (IRMAWATI, 2022). Migration pressure through the Mediterranean route has seen an increase in refugee arrivals by sea and land routes between 2016 and 2025, directly burdening domestic institutional capacity.

Figure 1. Sea and land arrivals from January 2016–2025 Source: Operational Data Portal



The data demonstrates significant fluctuations in arrival flows, with spikes at specific periods, confirming that Italy faces dynamic and recurring migration pressures. From the CPP perspective, this situation indicates that national capacity is no longer sufficient to handle the volume of arrivals alone, prompting Italy to adopt a supranational framework through the Temporary Protection Directive (TPD) 2001/55/EC. This integration creates a distribution of authority between the European Union, national governments, and local authorities, and strengthens policy stability through minimum standards that cannot be changed unilaterally (Beirens et al., 2016).

The activation of the TPD in 2022 in response to Ukrainian refugees demonstrated Italy's capacity to implement protection swiftly and coordinatedly within a stable, rights-based legal framework (Fellow, 2022). The combination of supranational institutions, multilevel governance capacity, and the discourse of European solidarity resulted in a more consistent protection system than Turkey's domestic approach. Thus, the historical background of both countries confirms that the effectiveness of Temporary Protection policies is largely determined by differences in institutional design and the underlying political context.

## **Comparison of the Implementation of Temporary Protection Policies in Turkey and Italy**

### **Institutions; Domestic Centralised with Multi-Level Supranational**

Institutional structure is a key determinant of operational capacity and consistency in policy implementation. Through this variable, the research seeks to identify the extent to which differences in institutional structure between Turkey's national regime and the European Union's supranational mechanism in Italy generate variations in policy capacity, legal certainty, and the consistency of basic rights protection for refugees. In this sense, institutions are not merely administrative arrangements, but structural environments that condition how temporary protection is translated into concrete practices of governance.

In Turkey, the Temporary Protection regime is built on a foundation of domestic law (Law No. 6458/2013 and TPR 2014) and is managed by a highly centralised institution, namely the Presidency of Migration Management (PMM) (Presidency of Migration Management, 2025). This centralisation enables rapid vertical coordination and broad registration coverage for millions of Syrian refugees (World Health Organization, 2021). The PMM acts as the main gatekeeper, integrating services from various ministries, such as health and education (Presidency, 2017). However, this model results in high dependence on the administrative capacity of the central government and leads to variations in the quality of implementation at the local level, where local governments have varying resources and capabilities (Turkey Report, 2025). Turkey's institutional flexibility is more of a pragmatic response to the pressure of massive numbers of refugees, but it has the potential to create long-term uncertainty because it is highly dependent on executive discretion.

The institutional dimension is reflected not only in the authority structure but also in administrative capacity, which can be measured through service coverage, registration speed, and the distribution of access to basic rights. In the Turkish context, data shows that by early 2025, the number of Syrian refugees under the Temporary Protection regime will remain in the range of 3.1–3.3 million, with over 98% living in urban areas rather than camps (European Council on Refugees and Exiles, 2025). This high number of urban refugees demonstrates the success of the centralized registration system in reaching a broad population in a relatively short time. The Presidency of Migration Management is able to register almost the entire population in a biometric system, which is a prerequisite for access to health and education services.

However, this centralization also results in unequal implementation at the local level. For example, the ratio of doctors to the refugee population in high-density provinces like Gaziantep and Sanliurfa is much lower than in western Turkey. WHO data shows that over 60% of health facilities serving refugees are located in just five provinces, indicating an uneven distribution of institutional capacity. In the education sector, the enrollment rate of Syrian refugee children in formal schools is over 65% at the primary level, but drops dramatically at the secondary level. This demonstrates

that central institutional capacity is not always matched by implementation capacity at the local level (Ekmekci, 2018).

In contrast, Italy operates within a multi-level governance institutional framework governed by the European Union's Temporary Protection Directive (TPD). The activation of the TPD in 2022 created a binding supranational normative framework, with clear minimum standards regarding refugee rights (European Commission, 2025). Its implementation involves a structured division of responsibilities between the European Commission (AIDA & Italy., 2024), national authorities (Ministry of the Interior, Questure), and local governments (The Council of European Union, 2022). This structure reduces Italy's unilateral discretion and creates greater policy consistency compared to Turkey's national model. However, its weakness lies in the complexity of coordination and variations in capacity at the local level (Database I, 2024). which can lead to disparities in the speed of service provision, as seen in the differences in accommodation facility capacity (Centri di Accoglienza Straordinaria) between region (Committee, 2025). Thus, the supranational EU institution provides legal certainty and uniform standards, but the challenges of technical implementation remain dependent on Italy's domestic institutional capacity.

In Italy, the activation of the Temporary Protection Directive in 2022 resulted in a more standardized registration mechanism. By 2024, more than 170,000 Ukrainian refugees had obtained TP-based residence permits (Visas & Immigration Team, 2026). Approximately 70% of applications were processed in less than 60 days, indicating a higher level of procedural certainty compared to the regular asylum system. Furthermore, data from the European Migration Network shows that more than 80% of TP recipients gained immediate access to national health services, while approximately 60% were integrated into the education or vocational training system within the first year. However, regional differences in capacity remain evident in Italy (Visit Ukraine, 2026). Northern regions such as Lombardy and Emilia-Romagna have almost double the accommodation capacity of southern regions. This demonstrates that while the supranational framework creates uniform standards, the effectiveness of implementation remains influenced by domestic institutional capacity.

This comparison shows that differences in institutional design result in trade-offs between flexibility and certainty. Turkey's centralised institutions allow for rapid and adaptive responses, but with less long-term stability. Meanwhile, Italy's multilevel institutions, while more rigid and complex, provide a more stable legal foundation and limit arbitrary policy fluctuations (Wilder, 2017).

### **Policy Discourse: “Guests” with European Solidarity**

Policy discourse functions as a lens that shapes public perception and political legitimacy towards refugee groups. The analysis of policy discourse aims to understand how refugees are positioned as humanitarian victims, social burdens, security threats, or temporary guests, and how these constructions influence the direction of Temporary Protection implementation in everyday practice. In this regard,

discourse is not merely rhetorical framing, but a governing instrument that structures administrative behaviour, public attitudes, and the scope of rights granted to refugees.

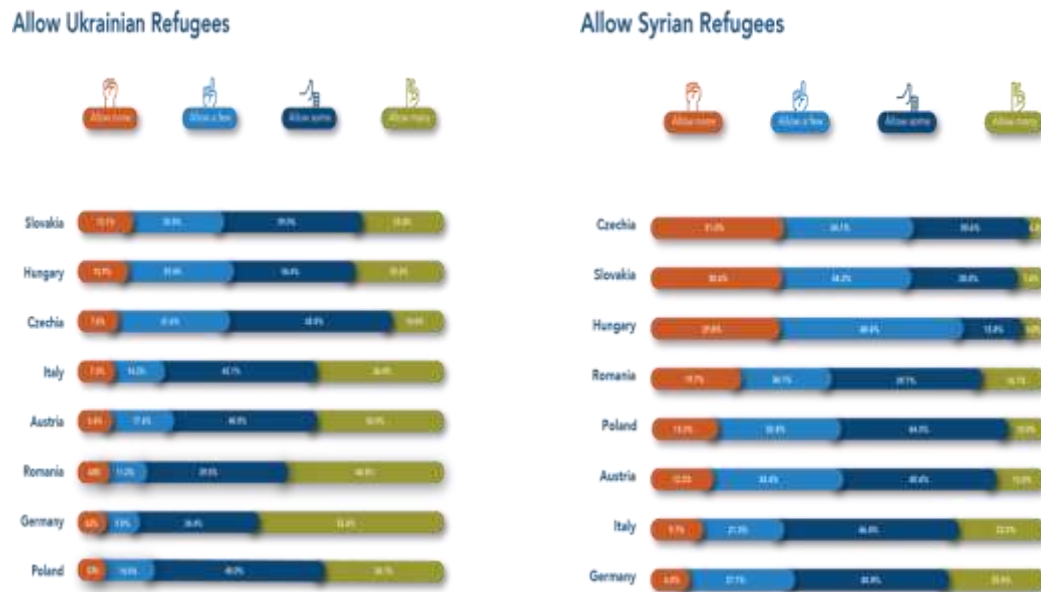
In Turkey, the government consistently frames Syrian refugees as ‘guests’ (*misafir*) (Abdelaaty, 2021). This narrative, rooted in the norm of hospitality, has succeeded in creating initial acceptance but at the same time affirms the temporary and conditional status of refugees. The ‘guest’ discourse avoids permanent commitments based on the 1951 Convention (due to geographical limitations) and places refugees as recipients of mercy who may be repatriated at some point in the future. This has resulted in restrictions on long-term integration rights and made the socio-political position of refugees fragile, pushing them into ‘pseudo-integration’ where they are physically present but not fully recognised legally and socially (Rygiel et al., 2016).

The influence of policy discourse on levels of social acceptance can be traced through public opinion data and indicators of social cohesion. National surveys in Turkey show that acceptance of Syrian refugees has declined significantly over the past decade. While in the early stages of the conflict, over 70% of the public supported an open-door policy, in 2023–2024, that figure dropped to below 35%. Furthermore, over 60% of respondents expressed a desire for refugees to be repatriated in the short term. This decline correlates with shifts in political framing and increasing domestic economic pressures (Ferris, 2025). In the employment sector, only around 5–7% of Syrian refugees have formal work permits, while the majority work in the informal sector, earning lower wages than local workers. This situation reinforces the narrative of temporaryity and weakens structural integration. The “*misafir*” discourse, which emphasizes temporary status, is indirectly reflected in low naturalization rates and limited vertical social mobility (Cevik, 2025).

Conversely, the discourse dominating policy in Italy and the European Union towards Ukrainian refugees is the narrative of ‘European solidarity’ and protection of ‘victims of war in Europe’ (Kinacioglu, 2023). Ukrainian refugees are framed as brothers and sisters who share geographical, cultural, and historical ties with EU countries (Bansak et al., 2023). This discourse has succeeded in building broad political consensus and high public support, which has facilitated the rapid activation of the TPD and more inclusive social acceptance (MATTIOLI, 2023). This narrative of solidarity operates within a rights-based framework, positioning refugees as legal subjects with legitimate claims to protection and integration.

In Italy, the narrative of European solidarity and “protection of war victims in Europe” created a strong normative foundation for social acceptance. This narrative was not only political, but also shaped the public perception that Ukrainian refugees were “brothers” deserving of support and integration. This narrative resulted in high public support for the TPD policy, which in turn facilitated more positive social interactions, as shown in the figure below;

Figure 2; Attitudes towards accepting Ukrainian and Syrian refugees (Source: Global Asylum Governance and the European Union's Role)



Referring to the data above, the narratives of "European solidarity" and "protection of war victims in Europe" in Italy play a powerful role in shaping perceptions, resulting in:

1. Figure 1 reflects high support for Ukrainian refugees because they are seen as part of their group (Europe).
2. Figure 2 shows lower support for Syrian refugees because they are seen as outside Europe (Geddes & Policy, 2022).

In the case of Italy and the European Union, a Eurobarometer survey showed that over 70% of EU citizens supported accepting Ukrainian refugees in the first year of the invasion, and Italy was among the countries with relatively high levels of public support (European Commission, 2023). Labor market data shows that in the first two years, over 40% of working-age Ukrainian refugees entered the formal sector, particularly in services, care, and light manufacturing. The educational participation rate of refugee children also exceeded 75%, reflecting more inclusive institutional and social acceptance (European Commission, 2023).

The difference in discourse has direct consequences for the dimension of community security within the human security framework. The 'guest' narrative in Turkey, although humanitarian, can reinforce social boundaries and trigger stigmatisation when the presence of refugees is perceived as prolonged (ERDOĞAN, 2022). Meanwhile, the narrative of solidarity in Italy has the potential to expand the scope of 'us' to include Ukrainian refugees, thereby reducing prejudice and facilitating more positive social interactions (Olcese et al., 2025). Thus, policy discourse is not neutral; it actively shapes social realities and parameters of acceptance that ultimately affect the quality of life of refugees.

## **Ideas and Norms; Domestic Pragmatism with Supra-national Rights-based Norms**

Ideas and norms constitute the underlying value framework that determines whether protection is granted as discretionary benevolence or as an enforceable entitlement. This variable seeks to trace the extent to which human rights norms, international solidarity, and humanitarian obligations are internalized into state policy, and how these ideas either restrict or expand the protective space available to refugees. In this sense, policies are not only technical instruments but reflections of deeper normative commitments that shape the boundaries of inclusion, rights recognition, and long-term integration prospects.

Turkey's TP policy is driven by pragmatic ideas and norms that emphasise state sovereignty, domestic security and administrative flexibility (Kirişci, 2014). Although Law No. 6458 contains principles of protection, its application to Syrian refugees does not fully refer to the standards of the 1951 Convention, but rather to considerations of national capacity and domestic political dynamics (Zenginkuzucu, 2021). This norm results in ad hoc and volatile policies, such as fluctuations in work permit regulations or access to services, which create chronic uncertainty for refugee (ŞahİN-mencütek et al., 2025).

The difference in normative orientation between the two protection regimes can be measured through regulatory stability and certainty of legal status. In the Turkish context, regulatory changes related to work permits, interprovincial mobility, and registration restrictions demonstrate the fluctuating nature of the policy. For example, in the 2022–2024 period, there was an increase in residence restrictions for refugees in more than 15 provinces, resulting in an increase in unofficial internal displacement. Furthermore, only a small percentage of refugees successfully transition to citizenship. Of the millions of Syrian refugees, the number who attain citizenship is approximately 5%, underscoring the temporary nature of the protection regime (Amin et al., 2025).

On the other hand, Italy's TP policy towards Ukrainian refugees is based on the European Union's strong supranational ideas and norms regarding human rights, collective solidarity, and the rule of law (Timmer & Häusler, 2014). The TPD itself is a manifestation of the EU's collective norms for dealing with mass influx in a dignified and standardised manner (Costello & Foster, 2022). These norms limit Italy's discretion and impose minimum rights-based protection standards.

In a TPD-based system, legal status security is achieved through the automation of residence permits and direct access to social rights, bypassing the lengthy asylum process. Over 90% of Ukrainian refugees in Italy obtain identity documents and social security numbers within the first year, enabling rapid access to public services and formal employment (Rahmadona, 2022).

As a result, Ukrainian refugees have gained clearer and more predictable access to employment, healthcare, and education from the outset (European Migration Network, 2024). The conflict between domestic and international norms is evident in this comparison. In Turkey, pragmatic domestic norms often prevail, resulting in a protection regime that is 'good enough' for emergency situations but fails to provide

long-term certainty. In contrast, in Italy, supranational EU norms function as a convergent force that aligns national policies with higher protection standards. Within the framework of Wilder's CPP, this demonstrates how the power of ideas and norms, whether domestic or foreign, can shape the 'institutional environment' and determine the extent to which policies are truly oriented towards the fulfilment of rights.

### **Political Culture: Executive Populism with Liberal Democratic Stability**

Political culture acts as a contextual variable that mediates how institutions, discourses, and norms are translated into everyday policy practices. Political culture does not emerge instantaneously in response to crises; rather, it reflects the continuity of deeply embedded belief structures, orientations toward authority, and patterns of legitimacy that have developed over time. Therefore, societal and state responses to refugees whether in the form of acceptance, resistance, or restrictive policies are shaped not only by contemporary pressures but also by historically rooted configurations of political culture. In this sense, temporary protection policies must be understood within broader trajectories of state–society relations and governance traditions.

Turkish political culture in the last decade has been characterised by strong executive populism and high sensitivity to migration issues in public debate. (Yıldız & Uzgören, 2016) Refugee policy is often used as a political tool and is subject to change in line with electoral dynamics or public opinion (Culture & Kingdom, 2024). This situation creates political insecurity for Syrian refugees, as their rights are vulnerable to sudden policy changes based more on popularity than on fixed principles.

Political culture variables can be traced through the level of politicization of migration issues and the stability of policies over time. In Turkey, election data and political surveys show that the refugee issue has become a key theme in national and local campaigns. The rise in anti-immigrant sentiment has been accompanied by fluctuations in administrative policies, including enforcement operations and voluntary repatriation policies. This situation has resulted in increased uncertainty about refugees' legal status and sense of security in their daily lives (Yusra & Jamilah, 2022).

In contrast, Italy has a more stable political culture with a tradition of liberal democracy and an institutionalised commitment to the EU legal system (Carter, 2011). In responding to the Ukraine crisis, this political culture encourages a more procedural, predictable approach that is relatively free from extreme politicisation. Refugees' interactions with state authorities (such as Questure) generally follow standard TPD guidelines, providing a sense of security and legal certainty (AIDA & Italy., 2024).

In the Italian context, although migration issues have been a key political contestation, the implementation of the TPD for Ukrainian refugees has remained relatively unchanged across successive governments. The level of participation of non-governmental organizations is also high. Over 1,000 civil society organizations are

involved in the provision of integration services, creating an additional layer of accountability beyond the state (VOA, 2022).

In addition, the space for participation by non-state actors (NGOs, UNHCR) that is more open in Italian political culture creates an additional layer of accountability that helps maintain standards of treatment (UNHCR Italy, 2017). The impact of this political culture is very evident in terms of the personal security and political security of refugees. In Turkey, a hierarchical and reactive political culture can manifest itself in discretionary and potentially arbitrary bureaucratic practices. Meanwhile, in Italy, a more deliberative and law-bound political culture provides greater protection from arbitrary state action. Thus, political culture is not merely a backdrop, but an active variable that determines the stability and quality of the refugee protection experience, proving Wilder's thesis that political culture influences whether policy processes are cooperative or adversarial.

## CONCLUSION

This research emphasizes that the Temporary Protection policy is a public policy practice that does not stand neutral, but is shaped by institutional configuration, policy discourse, norms, and the political culture that surrounds it. Using Matt Wilder's Comparative Public Policy (CPP) approach, this study shows that the differences in the implementation of Temporary Protection in Turkey and Italy reflect differences in public policy systems, whether it is differences in state capacity or levels of humanitarian solidarity.

In the Turkish context, the Temporary Protection policy is carried out through a highly centralized and pragmatic national system. This model allows for a rapid response to large numbers of refugees, especially in the provision of basic services such as health and education. However, the dominance of executive discretion, guesthood discourse, and state sovereignty-based protection norms result in legal uncertainty and limitations in long-term integration. This condition shows that the protection provided tends to be functional and temporary, with no guarantee of political security and certainty of continued status for refugees.

In contrast, Italy implemented the Temporary Protection Directive within the more institutionalized supranational framework of the European Union. Multi-level governance structures and rights-based norms limit discretionary policy space and create more consistent minimum protection standards. The discourse of European solidarity helps to strengthen the legitimacy of policy and social acceptance. Although it still faces coordination challenges and regional capacity inequality, this system provides a level of legal certainty and protection from arbitrary state actions.

Comparatively, this study found a trade-off between policy flexibility and protection stability. Adaptive national regimes risk generating long-term uncertainty, while stable supranational regimes face technical implementation challenges. These findings corroborate the CPP's argument that the effectiveness of public policies is highly dependent on the political and institutional context in which the policy is

implemented. This research contributes to the development of refugee studies by presenting a comparative analysis that integrates public policy and human security. In practical terms, the results of this study show that the Temporary Protection policy needs to be designed not only as an emergency solution, but as a transitional mechanism that leads to sustainable protection and dignified social integration.

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