

RESEARCH ARTICLE/ARAŞTIRMA MAKALESİ

Institutional structures, fragile transitions: Reception systems and transitions to adulthood for unaccompanied foreign children in Italy and Türkiye

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Abstract

Italy and Türkiye have made notable efforts to host unaccompanied children. Both countries border crisis areas and serve as transit points for these children. Italy stands out with its 2017 Zampa Law, a single legal framework specifically for unaccompanied children. Türkiye's framework is outlined in the Child Protection Law and the Foreigners and International Protection Law, with further specifications in the Unaccompanied Children Directive. Despite these laws, there can be discrepancies between policy and practice, affecting unaccompanied children's access to services and transition to adulthood.

Besides, unaccompanied children arriving in both Italy and Türkiye tend to be aged between 15 and 17 years old. This suggests that the majority of unaccompanied children are in the process of transitioning to adulthood, a critical phase where they need support and guidance to navigate their new surroundings and make informed decisions about their future. Consequently, this study focuses on the reception systems and accommodation services available to unaccompanied children under international protection in Italy and Türkiye. The study also investigates the opportunities and challenges that arise during the transition to adulthood.

For the purpose of this study, the data was collected through fieldwork conducted between 15 August 2024 and 27 May 2025 under the TÜBİTAK 2219 Postdoctoral Research Fellowship. As part of the field research covered by this study, interviews were conducted with 23 people. Eleven interviews were conducted in Italy. Four of these participants were academics, while seven were civil society representatives. Twelve participants were interviewed in Türkiye. Two of these participants were academics, four were ex-minors, two were local government representatives, three were civil society representatives, and one was a ministry employee. The study utilized a qualitative research design, which involved conducting semi-structured in-depth interviews with the aforementioned participants.

Keywords: Unaccompanied Children, International Protection, Transition to Adulthood, Türkiye, Italy

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1. INTRODUCTION

This comparative study examines the approaches and implementations of Türkiye and Italy in providing accommodation facilities, admission systems, and their impact on the autonomy of unaccompanied children under international protection. Both countries are signatories to the United Nations Convention on the Rights of the Child and adhere to the principles of the best interests of the child and non-refoulement. However, the practical application of these principles and the underlying institutional structures can differ substantially, resulting in significant structural gaps between laws and practices. These discrepancies pose challenges for unaccompanied children as they transition to adulthood.

Italy has a comprehensive legal framework in place for the unaccompanied foreign children. The Zampa Law, adopted in 2017, serves as the foundation for this framework. Notably, Italy is the only country worldwide with national legislation specifically designed to safeguard unaccompanied children.

According to the Zampa Law, an unaccompanied child is defined as an individual who is physically present on Italian territory, is not an Italian or European Union citizen, and is subject to Italian jurisdiction without the assistance or representation of parents or other adults who are legally responsible for them under Italian law (gazzettaufficiale, 2017).

A report issued by the Italian Ministry of the Interior on 31 December 2024 indicates that there are a total of 18,625 unaccompanied children, comprising 16,351 boys and 2,274 girls. (Ministero del Lavoro e delle Politiche Sociali, 2024). The majority of the children in this group are 17 years old, accounting for 56.8% of the total, while 21% are 16 years old (Ministero del Lavoro e delle Politiche Sociali, 2024).

The Ministry of Interior has not released definitive data on the number of unaccompanied children under international protection in Türkiye, but studies indicate that unaccompanied children arriving in Türkiye are generally between the

ages of 10 and 17 (Altıntop, 2022; Bulgurcuoğlu, 2023) with the majority between the ages of 15 and 17 (Altıntop, 2022; Seyitoğlu, 2023).

In Türkiye, an unaccompanied child is defined as a minor who enters the country without the presence of an adult who is legally or conventionally responsible for their care, or who remains unaccompanied after arrival, unless they are placed under the effective care of a responsible individual. (*Yabancılar ve Uluslararası Koruma Kanunu*, 2013)

Türkiye's international protection framework exhibits a dual structure, which is a direct result of the country's continued adherence to the geographical limitations established in the 1951 Geneva Convention (Refugees, 1951). Accordingly, individuals arriving in Türkiye to seek asylum from countries that are not members of the Council of Europe are not eligible to obtain refugee status. Instead, they can only be granted subsidiary protection or conditional refugee status (*Yabancılar ve Uluslararası Koruma Kanunu*, 2013). When there is a high volume of migration that could affect the asylum system, a temporary protection decision may be made.

The fact that unaccompanied children under international protection in Türkiye and Italy typically range in age from 15 to 17 upon arrival in the country suggests that they are already in the process of transitioning to adulthood. This situation underscores the necessity for rights-based provision of accommodation services during the brief period between admission and transition to adulthood, as well as the critical threshold of autonomy gains. As these minors are on the cusp of adulthood, they require tailored support to navigate the complexities of transitioning from a protected status to independence. Their age and circumstances necessitate a nuanced approach to ensure they receive the necessary assistance to make a smooth transition.

This study investigates the reception systems and accommodation centres in Türkiye and Italy, as well as the autonomy processes of unaccompanied children under international protection as they transition to

adulthood. Initially, the reception systems and accommodation centres in Italy and Türkiye will be examined, followed by a discussion of the practices related to the autonomy gains of unaccompanied children. Subsequently, data collected from Italy and Türkiye will be analysed in terms of i) children's access to accommodation services and children's rights, and ii) the extent to which activities aimed at achieving autonomy are child-centred and take into account the best interests of the child.

2. RECEPTION SYSTEMS and ACCOMMODATION OPPORTUNITIES in ITALY and TÜRKİYE

2.1. Reception System and SAI in Italy

Italy's reception system comprises two stages: primary and secondary reception centres. The primary reception centres, established and managed by the ministry, serve as initial points of contact to address emergency assistance and protection needs, conduct identity and age verification procedures, and provide information on the rights of children (Argento, 2024). These centres are funded by the Asylum, Migration and Integration Fund (FAMI) (Argento, 2024). According to the Zampa Law, unaccompanied children typically remain in primary accommodation centres for 30 days; however, a Decree-Law issued in 2023 extended this period to 45 days, marking the Meloni Government's first direct intervention in this legislation.

During periods of high migration, when primary reception facilities are insufficient, provincial governments can establish Temporary Accommodation Centres, known as Centri di Accoglienza Straordinaria, with a maximum capacity of 50 individuals, particularly for children (ASGI, 2021). Although intended as temporary solutions, these centres can become permanent, and the initial emergency response may evolve into a long-term institutional arrangement. Furthermore, if space is unavailable in centres catering to minors, individuals over 16 years of age may be accommodated alongside adults (AIDA, ECRE and ASGI, 2020; AIDA, 2024). Additionally, the transfer of unaccompanied minors from primary

to secondary accommodation centres may take longer than the designated timeframes (AIDA, 2024).

Upon arrival at primary reception centres, public security officials, assisted by cultural mediators, conduct an initial verification of a child's identity and age through examination of personal documents, including passports, identity cards, birth certificates, and other identification documents featuring a photograph (Ministero del Lavoro e delle Politiche Sociali, 2025a). The Zampa Law specifies that a multidisciplinary team must conduct this process with utmost care, as an inaccurate assessment may preclude or entirely deny a child access to special accommodation services and their corresponding rights under the law.

The Reception and Integration System, also known as SAI (Sistema di accoglienza e integrazione), is a structure that facilitates the transfer of unaccompanied children from primary accommodation centres to secondary centres following identification. This system was established in 2020, replacing the previous SIPROMI framework (*SIPROIMI - Sardegnaimmigrazione*, 2025). The SAI framework incorporates specific provisions for unaccompanied minors, which are a direct result of the mandatory requirements outlined in the Zampa Law enacted in 2017 (gazzettaufficiale, 2017).

The implementation of projects for the reception and integration of unaccompanied children in Italy involves a multi-level governance structure, comprising the Ministry of the Interior, local municipalities and authorities, civil society organisations, and social cooperatives within the SAI (Argento, 2024). At present, Italy hosts 208 active projects providing support to unaccompanied children (Ministero del Lavoro e delle Politiche Sociali, 2025b), with a combined accommodation capacity of 5,976 places (AGIA, 2025). A mathematical calculation may indicate that 28 children are residing at a shelter, as per the specified number. However, it is essential to note that a project can comprise multiple houses, and the occupancy of these houses typically ranges from 4 to 10 individuals (Cinformi, 2018).

SAI projects are approved by municipalities in agreement with the Ministry of the Interior, as per the guidelines established by the Ministry (Ministero dell'Interno, 2021). Municipalities retain responsibility for monitoring these projects and, when a suitable location is not available, for providing accommodation (Argento, 2024).

In Italy, unaccompanied minors are housed in various types of projects within the SAI system, with autonomy homes being the first of these. Notably, there is no standardized national definition of autonomy homes, despite the significance of the Zampa Law, which does not provide a definition. Instead, the scope of autonomy homes is defined by regional directives and regulations. In fact, these homes existed even before the Zampa Law. The presence of these homes is crucial to the accommodation system in Italy (Associazione Don Vincenzo Matrangolo, 2025). Autonomy homes offer more than just a place of residence. While their specific features differ across regions, they often provide access to educational resources, vocational training, employment networks to enhance job prospects, and direct job placement opportunities. (Un Sole per Tutti, 2025).

Group apartments, also referred to as gruppi appartamento, represent a second-level accommodation and care model designed for unaccompanied minors. Typically, these units comprise flats that house between 6 and 10 children, who are supervised by one or more educators or social workers. (Regione del Veneto, 2019). Although there are examples where children who are more prepared for adulthood than their peers and who have greater potential for autonomy are given priority in this type of accommodation, one of the primary goals in apartment groups is for children to gain autonomy as they transition to adulthood. (Belli, 2021; Il Sogno di Don Bosco, 2025).

The voluntary guardianship system also provides support to the lives of unaccompanied children at the secondary accommodation level throughout the accommodation process. This system is comprised of individuals who respond to a call issued by Regional Children and Adolescents Guarantee Authorities, complete the required

training, and are subsequently appointed by the Children's Court (Long, 2021; Allegri, 2024). Volunteer guardians are responsible for legally representing the child in all matters and supporting their integration into Italian society and the Italian system. (Save the Children, 2019; Bassani *et al.*, 2021). The child continues to stay at the accommodation centres, but volunteer guardians provide support in areas ranging from education to health, vocational training to transition to adulthood, based on the bond of trust and communication they have established with the child.

When unaccompanied children reach the age of 18, their relationship with accommodation centres typically comes to an end. Nevertheless, in Italy, there is an additional option available, known as administrative continuity (proseggio amministrativo). This provision allows unaccompanied children who are not yet in a position to live independently to continue receiving support until they reach the age of 21 (ReteSAI, 2021). For this to occur, the child must be enrolled in an ongoing education, vocational training, or internship program (Principe, 2021). In addition to the requirements mentioned earlier, the child must be registered in the SAI system or hold a residence permit for minors. The decision on care is made by the Juvenile Court, with the social services report and the report from the voluntary or public guardian being crucial factors in this decision (ReteSAI, 2021). Following a positive decision, former minors who were granted care and are now over the age of 18 continue to receive accommodation services in specially designated homes.

Due to Italy's regional structure, there may be regional differences in the implementation and provision of services.

2.2. Reception System and Accommodation in Türkiye

The Turkish State is primarily responsible for the provision of protection to unaccompanied children arriving in Türkiye, and the Ministry of Family and Social Services is the state institution tasked with the care and protection of persons under the age of 18 (Mülteci Hakları Merkezi,

2022). The Presidency of Migration Management is responsible for identity and age verification (Göç İdaresi Başkanlığı, 2022). The overarching legal framework governing unaccompanied children comprises three primary regulations: the Child Protection Law, the Law on Foreigners and International Protection, and the Unaccompanied Children Directive. In accordance with the prevailing legal framework, the central government is entrusted with primary authority. Despite the heterogeneity of practices observed at the local level among municipalities and civil society organisations, the primary responsibility for addressing these issues lies with public institutions. (Çocuk Koruma Kanunu, 2005; Yabancılar ve Uluslararası Koruma Kanunu, 2013).

It is evident that Türkiye's reception structure is characterised by a dual-tiered system. Unaccompanied children are initially received by designated reception units and subsequently transferred to the institution to which they are assigned for the duration of their stay (Seyitoğlu, 2023). The number of such institutions is very limited, and they are not found in every province of Türkiye. Moreover, it should be noted that these institutions are exclusively designed for unaccompanied male children. In the context of Türkiye, there is an absence of specialised institutions catering to unaccompanied girls. It has been determined that unaccompanied girls accommodate in the same institutions as girls who are citizens of the Republic of Türkiye. (Bulgurcuoğlu, 2023).

Unaccompanied children are placed in specialised institutions that provide services to these children, as specified in Article 5 of the Child Support Centres Regulation (Aile ve Sosyal Hizmetler Bakanlığı Çocuk Hizmetleri Genel Müdürlüğü, 2015). The Ministry of Family and Social Services has established six specialised institutions to provide services (Bakanlığı and Müdürlüğü, 2025).

Unaccompanied children in Türkiye are housed in accommodation centres appropriate for their age. If the child is under 12 years old, they are housed in the 'Children's Homes Site'; if they are over 12 years old, they are housed in the Child

Support Centre – now known as the Specialised Children's Homes Site (Seyitoğlu, 2023). Considering that the ages of children arriving in Türkiye are closer to adulthood, unaccompanied children are generally accommodated in institutional facilities formerly known as Child Support Centres (ÇODEM). (Mülteci Hakları Merkezi, 2025).

Children can stay in these institutions until they reach the age of 18, and their basic needs such as food, health, education and clothing are provided free of charge (Mülteci Hakları Merkezi, 2025). The capacity of each facility is generally between 20 and 40 children. It has been determined that unaccompanied children who are citizens of the Republic of Türkiye will not be accommodated in the same centres as unaccompanied foreign children.

Problems may also arise in these accommodation centres for unaccompanied children under international protection due to the arbitrary behaviour of the centre directors and staff. For example, a child may be removed from the accommodation centre early on the grounds that they are an adult, based on the results of a bone test to determine their age (Altıntop, 2022). This situation also means that the minor cannot benefit from the presumption of age.

In addition, some unaccompanied children may exhibit runaway behaviour. This may be related to the child's reason for coming (to earn money, find work, send money home, move on to Europe), or it may be because they are unable to do what they want or find and perceive the institution too restrictive. (Bulgurcuoğlu, 2023).

When unaccompanied children reach the age of 18, their relationship with accommodation centres is terminated. Therefore, reaching the age of 18 is a period of uncertainty for unaccompanied children. However, in some cases, it is possible to extend the accommodation measure. If the child is continuing their secondary education, they can continue to benefit from accommodation services until the age of 20, and if they are continuing their higher education, until the age of 25 (T. C. Aile ve Sosyal Hizmetler Bakanlığı, 1983).

However, this method cannot be said to be a

popular choice, as unaccompanied children arriving in Türkiye are unable to bring their educational documents with them and prefer to enter the workforce rather than continue their education. According to the Social Services Law, accommodation can be extended until the age of 20 in cases where the child is unable to support themselves and cannot find a job or profession (T. C. Aile ve Sosyal Hizmetler Bakanlığı, 1983). However this is not a situation that is commonly encountered in practice.

The absence of a structured transition to adulthood programme for unaccompanied minors in Türkiye is a salient issue.

3. METHODOLOGY

This study was conducted under the TÜBİTAK 2219 Postdoctoral Research Fellowship. The article is based on field visits, interviews, and literature reviews conducted in Italy and Türkiye between 14 August 2024 and 27 June 2025.

The units of analysis of the research analysis comprise the procedures, laws, and practitioners and experts related to accommodation facilities and reception systems for unaccompanied children in Italy and Türkiye, as well as civil actors in the field and the unaccompanied children themselves.

The units of analysis also comprise multiple observation units. These observation units in the study are: i) the Zampa Law in Italy and related laws, procedures, and regulations; ii) relevant laws, procedures, and regulations in Türkiye; iii) academics, experts, civil society workers, and local government representatives primarily working in the field of the transition to adulthood of unaccompanied children, specifically in the area of the reception system in Italy; iv) experts, civil society workers, academics, and local community representatives working on transition to adulthood practices in Türkiye; v) ex-minors in Türkiye; vi) public officials involved in this process in both Türkiye and Italy.

The decision that the study is ethically appropriate was made unanimously by the Istanbul University Social and Human Sciences Ethics Committee at its meeting on 29 April 2024, with the reference number 04.

As part of the field research covered by this study, a total of 23 interviews were conducted. In Italy, 11 interviews took place, with the participants consisting of four academics and seven civil society representatives. In Türkiye, 12 individuals were interviewed, comprising two academics, four ex-minors, two local government representatives, three civil society representatives, and one ministry employee.

The participant code in the table can be broken down as follows: codes beginning with the letter I indicate participation from Italy, while those starting with T indicate participation from Türkiye. The presence of the letter A after the first letter signifies an academic affiliation, the inclusion of the word NGO denotes involvement from civil society, the term EXM indicates participation from ex-minor groups, the term LA signifies participation from local authority / governments, and the abbreviation PB indicates participation from public bodies / institutions.

Table 1. Profile of Participants

Participant	Institution	Date	Duration
I-A-1	Università di Roma Tre	28.02.2025	42m
I-A-2	Università Cattolica del Sacro Cuore	10.06.2025	Written
I-A-3	Institute of International Affairs	13.05.2025	37m
I-A-4	Università di Bologna	20.05.2025	49m
I-NGO-1	Cinformi	2.05.2025	Written
I-NGO-2	CNCA	3.04.2025	Written
I-NGO-3	Dedalus	17.04.2025	48m
I-NGO-4	Villaggio del Fanciullo	28.04.2025	36m
I-NGO-5	Villaggio del Fanciullo	28.04.2025	29m
I-NGO-6	APPM	11.05.2025	48m
I-NGO-7	MoltiVolti	24.06.2025	41m
T-A-1	Kafkas University	24.12.2025	1h 19m
T-A-2	Acıbadem University	21.12.2024	55m
T-EXM-1	Ex-minor	19.12.2024	45m
T-EXM-2	Ex-minor	19.12.2024	25m

T-EXM-3	Ex-minor	19.12.2024	40m
T-EXM-4	Ex-minor	19.12.2024	20m
T-LA-1	Izmir Metropolitan Municipality	1.05.2025	48m
T-LA-2	Izmir Metropolitan Municipality	6.05.2025	28m
T-NGO-1	NGO	18.04.2025	1h 18m
T-NGO-2	NGO	24.04.2025	1h 8m
T-NGO-3	NGO	19.04.2025	1h 6m
T-PB-1	Ministry	5.05.2025	1h 21m

4. FINDINGS: OPPORTUNITIES, CHALLENGES and PROCESSES in the TRANSITION to ADULthood for UNACCOMPANIED CHILDREN

4.1. Opportunities and Challenges Considering Regional Differences in the Evolving System in Italy

The existence of structures such as SAI and autonomy houses in Italy plays a significant role in children's transition to adulthood. It is particularly beneficial for a small number of children to live in a house, as this arrangement supports their autonomy and allows them to learn house rules and essential life skills.

Individualised programmes for children are a significant advantage, but regional disparities, the reasons behind children's migration, and financial unsustainability are crucial concerns. Disruptions often lead children to leave the reception and accommodation system and resort to earning money on the streets. Effective practices, on the other hand, promote children's positive integration into Italian society and contribute to their development into law-abiding adults. The structural discrepancy between law and practice in Italy is also evident in the SAI.

4.1.1. "Minori per Legge, Adolta per Realta"

This phrase was the title of a meeting convened by the municipality in Bologna to discuss unaccompanied children. Legally, a child is defined as an individual under 18, but in reality, children who between 14 and 18, often possess a level of experience similar to that of adults. This phrase highlights two key points. Firstly,

even though they are minors, these children are often equipped with a level of maturity and life experience that is comparable to that of adults. Secondly, when developing individual education plans, it is essential to take into account the reasons behind their migration and the maturity that their age may bring. Consequently, autonomy plans for children should be designed and their transition to adulthood managed in a manner that is tailored to their age and takes into consideration the reasons for their migration.

One of the most striking findings from the field research is that unaccompanied children, despite being legally minors under the age of 18, exhibit adult-like thought processes in relation to their experiences during the migration journey and beyond.

"One of the points we highlight regarding the transition to adulthood is that, although they are children in terms of their age, they are adults in terms of their experiences and mindsets. They think about how they will work and how they will live. They are not interested in education. They want to work, earn money, and sometimes send part of that money to their families in their home countries. Sometimes they also want to go to other European countries to work. They think with an adult mind, not a child's mind." (I-A-1)

4.1.2. Winning the Lottery: Differences in the SAI

The SAI structure is said to be more effective than its predecessor, with notable improvements made since the past.

"SAI is better than before. There has been progress in terms of the system, but that does not mean that everything is perfect." (I-NGO-7)

However, there are also those who argue that there is little to no significant difference from the previous system.

The lack of homogeneity in the SAI system can have a significant impact on children's futures, as existing differences can affect their outcomes depending on the specific SAI project they are assigned to. If a child is placed in a well-managed project, they are likely to receive tailored support,

including individualized education, which can be carefully monitored to ensure their needs are being met. Conversely, if they are in a less effective project, they may become overlooked or lost within the system.

The SAI system is not the same everywhere. Even within the same region....” (I-NGO-7)

“There’s a report quite recently by Save the Children which refers to a lottery of accommodation centres, so if you get in a good one, things will go well.” (I-A-4)

The varying characteristics of SAI projects, particularly the principle of voluntariness, have contributed to a greater number of SAI projects in the southern region.

“SAI is a national system based on unequal economic foundations between different regions. The principle of voluntariness is critical; not all municipalities are willing to participate in the SAI system, which means that most SAI projects are located in southern Italy..” (I-NGO-2)

This situation also highlights the importance of the north-south divide. The north-south divide refers to the economic, social, and cultural differences between the northern and southern regions of Italy, often resulting in disparities in living standards, access to resources, and accommodation opportunities.

4.1.3. The Intersection of Migration Mobility and South-North Disparity

Two important points stand out in the south-north difference. The first is the decrease in unaccompanied migration towards Italy due to war and conflict, and the increase in migration for economic reasons (finding work, sending money home, etc.).

“Children who have fled their countries due to war and persecution are now in a completely different situation. Only five people at our centre have fled war; the other 95% are people who have migrated solely for work and have not experienced any problems in their own countries. In other words, they have come from safe countries and tell us, ‘I don’t know.’.” (I-NGO-4)

Secondly, although there are differences between projects operating within the SAI system, as

mentioned above, there are also differences between the north and south. The main reason for this is that there is greater migration and a higher number of unaccompanied children in the south.

However, it has been highlighted that employment opportunities are greater in the north due to the higher standard of living there, and that success rates in projects are higher.

“I tell you that we in Trentino are the top of the whole program because when there is the supervision by Rome. Because every year central government do the supervision in all of Italy, where these projects are. But in Trentino we travel at the top, in the sense that we have the guys at heart. Because many projects at the beginning looked for money and did little work. We, like APPM, which is the Provincial Association for Minors in Lusso, at heart to give them a future. We, from the beginning, we try to help them, aspect, let’s say, of the Italian. The aspect of the work shooting, the search for a house and autonomy.” (I-NGO-6)

Well-run projects can bring about significant changes in children’s lives. For example, the PAG project run by Dedalus in Naples is one such example.

“This is a project supported by the municipality, i.e. the state, and the public. As part of this project, we are working with a group of six people, helping them to continue on their path and, above all, to find employment and housing.” (I-NGO-3)

Another good practice example is Villaggio Fancillo in Ravenna. Established on a large area for unaccompanied children based on the concept of a village, the settlement offers many facilities, from houses where children can stay to a dining hall where they can cook, sports facilities, and an amphitheatre. Within this framework, children are accepted irrespective of the motivations behind their arrival. A comprehensive range of activities is facilitated, encompassing Italian language education, emotional awareness, talent discovery, and societal integration. Furthermore, the institution employs a child-centred approach, with a focus on the developmental needs of the children.

“We don’t mind about their illegal way to enter in

Italy because we are not police officer. But we are educators, professionals. Our responsibility is not to discover the truth or the false. We want to give to the society a better citizen when a minor reach the 18 and go outside.” (I-NGO-4)

4.1.4. Transition to Adulthood: Everything Depends on the Money in Their Pocket

The most significant factor determining the capacity of children to secure independent living arrangements post-adulthood is their ability to generate income. Upon securing employment, individuals tend to refrain from engaging with criminal organisations in the streets.

“There is a centre in San Lorenzo where they can spend their time. (...). They can spend time there. They stay away from criminal organisations. They can stay as long as they want and participate in any programme they want. They can also participate in educational programmes. Italian language courses are also organised. It is an important centre for overcoming language barriers and finding employment, given that they are 18-19 years old.” (I-A-1)

Children’s ability to earn money and build a life is also linked to their ability to spend money. In this context, it is important to provide pocket money in SAI projects. However, the funding of SAI project expenditures at the end of the year requires the institutions running the project to be financially strong. This can prevent fragile projects from providing children with cash allowances, which in turn creates risks.

“Those who run projects in the SAI system pay out of their own pockets first. They then invoice and recover the money they have spent from the fund at the end of the year. This is voluntary and good, but it limits the implementation of institutions that do not have the funds. Financially weak (but humanly strong) institutions cannot put pocket money in children’s pockets, so children look for ways to earn money on the streets.”. (I-NGO-7)

4.2. Opportunities and Challenges in Centralised System in Türkiye

Following the 2022 regulations in Türkiye, the number of children staying in each reception and accommodation centres has been reduced and

more qualified services have been encouraged. This does not mean that the number of children benefiting from these services has decreased.

However, there have been negative examples of unaccompanied children losing their rights as a result of the arbitrary behaviour of accommodation centre directors. In addition, the fact that they are not fully prepared for adult life when they turn 18 is also a prominent issue.

4.2.1. What the Centralised System Promises and What can be Done More

In Türkiye, institutional culture, accommodation and reception systems are largely run by the central authority. This cannot be directly assessed as a good or bad phenomenon. Although the institutional cultures of countries differ from one another, they can yield positive results. The effectiveness of the central authority in Türkiye is important for ensuring protection across the country. On the other hand, when there is a problem with an unaccompanied child, it is possible for a conflict of interest to arise because the people responsible for the child and the people who supervise them are part of the same authority.

“If support is provided within the government structure for the protection of children, and if there is work being done in this area, local governments are expected to comply with certain restrictions. And we are required by law to comply with these restrictions..” (T-LA-1)

“(...) Therefore, at this point, the central government needs to delegate authority, transfer responsibilities and delegate powers to local governments. This requires legal regulations. Therefore, as things stand, it is not currently possible for the local governments you mentioned to be involved in such a process, to be involved in the childcare system, and to provide services, particularly for migrant children, unaccompanied children, or children in need of protection in national local communities.” (T-LA-2)

However, there are also examples of cooperation with civil society, which plays an important role in identifying children’s vulnerabilities or problems.

“The association was conducting activities at the Child Support Centre. Cooperation had been established at the Child Support Centre. Activities and psychosocial support activities were organised for children in institutional care there. And if a case arose during those activities, it was referred to child protection teams. Our friends referred them to social service institutions. And so, the cases identified during those support sessions came to our attention at that time. Unfortunately, this is not a very common practice.” (T-NGO-2)

There may be shortcomings in the transition to adulthood guidance provided by ÇODEMs. Of course, the prevalence of this can be determined through research conducted nationwide. However, even when qualitative research does not claim to provide generalisable data, it can reveal important findings that help us understand the process. One of the shortcomings is the lack of a well-structured preparation system for the transition to adulthood.

“As far as I have read and heard, there was only one in Konya in Türkiye. It was working well in Konya. But apart from that, I cannot say that local governments were very active in this process. ÇODEMs are very cautious about it because it is perceived as a problem. The public sector wants to take responsibility, but it cannot do so completely..” (T-A-1)

Another important point is that, in Türkiye, where civil society and municipalities are empowered, there is a possibility that institutions and organisations with different world views and lifestyles may implement different practices and procedures without considering the best interests of the child.

“Central authority is very strong in Türkiye. Responsibilities can be shared locally. Associations and municipalities can set an example with good practices. However, it must be ensured that associations, foundations, and other institutions and organisations adopt a child rights-centred approach. Opening places with different intentions is neither beneficial to children nor to the system. (T-A-2)

4.2.2. Uncertainty in the Transition to Adulthood: Housing Crises after 18, Lack of Employment and Deportations

Unaccompanied children transitioning to adulthood are unaware of the rights they are entitled to, and there are only a limited number of examples of practices that could serve as models. For example, unaccompanied children can continue to benefit from accommodation services if they continue their higher education. However, due to the lack of access to education and insufficient sharing of information, it is difficult for them to take advantage of these opportunities.

“They need to know this. They should not forget that this is also done for foreign children in Türkiye. They also need to make an effort. But there is a precedent decision after all. For example, there are practices that are not implemented because they might set a precedent. There are things that are not done because they might lead to a precedent. But there is a precedent. I haven’t heard of many cases where this has been done. As far as I understand, the children are not informed about this either. It is close to the separation process. They should be informed between three months and three days in advance. But there is no information mechanism in place.” (T-A-1)

Furthermore, after leaving accommodation centres, problems accessing employment and high rents prevent unaccompanied children from establishing an independent life.

Finding a job is also a significant problem. Simply finding legal employment does not necessarily resolve all issues. Ex-minors with conditional refugee status may risk losing their right to travel to a third safe country if they take up insured employment. This creates a fragile situation between uninsured employment and the hope of reaching a third safe country.

“People from the Social Security Institution came to my workplace for an inspection. A complaint had been filed because I was working without insurance. The man (the employer) does not provide insurance because he evades taxes. If I obtain a work permit, my status in Australia (a safe third country) will be completely revoked. They say that my standard of living is adequate, meaning that I am satisfied with

the country and can make a living, so they are not processing my file.” (T-EXM-3)

Furthermore, integration into society and readiness for adulthood are not solely related to money. Money is an important factor, but feeling supported is also a significant element.

“After leaving the accommodation centre, neither the ministry nor the governor’s office nor anyone else asked me anything. The people who helped me, including the UN, call me every month to ask if I am going to school and receiving an education or course. They ask if I am meeting the criteria. No one asked me how my life was going.” (T-EXM-1)

Children also have difficulty obtaining information about what kind of support mechanisms they can access when they leave the centres. This lack of information can be a significant factor in making the process at least a little easier for them.

“Social workers need to be aware of all available resources and refer children to them. In the thesis I read, they heard about it from their friends. They hear about it from other young people who have left the institution. Perhaps one or two specialists refer them.” (T-A-1)

Recently, however, the hardening of migration policy has brought with it problems such as more frequent deportations and the closure of cases involving unaccompanied children. However, the prevalence of such practices is unknown.

“After leaving the institutions, I heard from examples and cases within the association, not from my own experience, that some of them had their identities revoked, were directed to reapply, and their applications were not approved. Once a child leaves the institution, they are not provided with any educational or financial security. They are thrown directly into the unknown of life.” (T-NGO-1)

4.2.3. Early (Forcibly) Leavings and Positive Transformation after 2022

In some isolated cases, early compulsory departures may occur during stays at accommodation centres. Children who are considered to be causing problems may be subjected to bone tests and, if found to be adults,

their connection with the centre may be severed.

“Some of our friends who were fighting were sent for testing. When they came back, they said they were adults and cut off contact with them. As far as I know, he was 16 years old. I don’t know what happened to him after that.” (T-EXM-1)

In addition, the centres offer education and daily schedules for children. This is a good example. However, it is noted that there is little flexibility in the daily schedules for each child. Children are not involved in the preparation of these schedules. This situation contributes to children’s attempts to escape from the shelters. Another factor contributing to escapes is the lack of effective vocational training for children.

“But experts, especially social workers, are seriously involved in guiding children’s vocational education. That’s a good thing. But for many children, this is not done in many institutions, so they run away from the institution. They need and seek a life where they can earn money.” (T-A-1)

It should be noted that the legal changes made in 2022 have led to better conditions in terms of quantity in the centres where children are housed. While children could stay in groups of 40-70 during the 2017-2020 period, after the 2022 regulation, the numbers were reduced, and children began to stay in centres and children’s homes in smaller groups. This has also been an important driving factor in providing children with more qualified services in accommodation centres.

“There are ÇEKOMs. Children’s home coordination centres. They are also homes where 5 or 6 children live in an apartment. (...) There are ÇESs, children’s home sites. You can think of them as places where 20 children live together” (T-PB-1)

5. DISCUSSION of FINDINGS: A GENERAL COMPARISON and TRANSITION to ADULTHOOD

Italy has a comprehensive and specific legal framework (Zampa Law 47/2017) designed specifically for unaccompanied children. This law clearly defines children’s rights and protection mechanisms. Türkiye largely deals

with unaccompanied children under general foreigner and international protection law and child protection law.

Italy's comprehensive law specifically addressing unaccompanied children provides clearer powers, reduces uncertainty and may lead to more consistent implementation of rights and services tailored to the unique vulnerabilities of these children. In contrast, including unaccompanied children in general legislation, even if their 'special needs' are recognised, carries the risk of their special needs being overlooked or diluted in practice, which can lead to less effective protection and care and a more fragmented approach to autonomy development.

In the context of the accommodation system, responsibility in Türkiye lies with the Ministry of Family and Social Services. In Italy, there is multi-level governance between the Ministry of the Interior, the Regional Authority for Children and Adolescents (AGIA), the Juvenile Courts, local authorities and civil society.

Both countries rely heavily on institutional care for unaccompanied children, but there are differences in their approaches and challenges in implementation. Italy faces serious challenges such as overcrowding and the placement of minors in adult facilities. This situation directly contradicts legal standards and harms the welfare of children. On the other hand there is no publicly available detailed data for Türkiye.

In Italy, SAI projects for autonomy, which is important for the transition to adulthood, explicitly include school courses, vocational training, career guidance and job placement programmes aimed at social inclusion and autonomy. They provide free basic education within institutions and offer vocational and general culture courses. Italy has special programmes that focus on mentoring during the transition to adulthood.

Both countries have certain problems within their own systems. In Italy, the heterogeneous projects within the SAI and the differences between the southern and northern regions stand out. In Türkiye, the closure of international protection

files and departures from accommodation centres before the age of 18 stand out. In both countries, finding a home after the age of 18 is a crisis area. Both systemic flaws and practices that could lead to children rights violations are emerging as issues during the transition to adulthood.

In Italy, the administrative continuity decision ensures that children can receive protection until the age of 21, provided that they continue their formal or vocational education. Although not widely used, it is a method that is resorted to. This is valuable in terms of the child's participation in society as an autonomous individual. However, the financial burden of this process being primarily borne by the municipality can also create problems in directing the child towards this opportunity. In Türkiye, similar measures can be extended with the condition of education. However, the scope of application is limited. Considering that access to education rates are also low, the scope of application is even more limited.

However, both systems have improved over the years. Compared to the past, both countries are now in a better position to provide accommodation for unaccompanied children and help them transition to adulthood. Nevertheless, both countries still face certain challenges. An approach that prioritises unaccompanied children as individuals growing up in migrancy (a state of migration) (Goździak and Seeberg, 2016) and views them not as illegal immigrants but as individuals in accordance with their age should be permanently established.

6. CONCLUSION

The common strengths of both countries are their commitment to the best interests of the child principle and the non-refoulement principle, their awareness of the need for basic care, education and psychosocial support. On the other hand, their weaknesses are that, although the benefits of family-based care are recognised, both countries rely heavily on institutional facilities, which can limit individualised support and the development of autonomy.

The transition to adulthood, with support

systems potentially coming to an end or becoming less comprehensive, is a critical point of vulnerability in both countries, especially in Türkiye. This situation creates a cliff effect and anxiety for children.

Despite their commitment to child protection, both countries face significant implementation challenges. Italy's challenges stem mainly from high caseloads and systemic inefficiencies, which create a gap between its advanced legal framework and practical implementation. Türkiye's challenges, on the other hand, stem more from the breadth of its legal framework, with a notable lack of detailed provisions specific to unaccompanied children, particularly regarding the comprehensive autonomy development required after the age of 18. The different nature of the challenges shows that, although both countries aim to protect children, the systemic barriers to achieving full autonomy for unaccompanied children are different and require different policy interventions.

In conclusion, although Türkiye and Italy continue to uphold their commitments to protect unaccompanied foreign children, there are significant differences between their legal frameworks, reception and accommodation systems and, most importantly, their effectiveness in supporting autonomy. Italy's possession of a special and comprehensive legal framework, such as the Zampa Law, and its inclusion of provisions for support after the age of 18, provides a stronger foundation for protecting children's rights and facilitating their future integration. In contrast, Türkiye's approach based on general legislation and gaps in care and services after the age of 18 create significant obstacles to children's path to full autonomy. However, even if all legal regulations are in place, it is equally important that practices that prioritise children and recognise them as individuals are implemented effectively.

The long-term well-being and successful integration of unaccompanied foreign children depends not only on initial protection and the provision of accommodation, but also on comprehensive, sustainable support that empowers them to become self-sufficient

adults. Continuous policy improvement, robust and well-functioning practices, and strong collaboration among all stakeholders are vital to protecting the rights of every unaccompanied child and securing their future.

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