

Research Article

Response to Global Refugee Crisis: In Search of Best Practices for the States

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Abstract: Human The global refugee crisis has become a critical concern in international law. Despite the presence of an international refugee law regime, the refugee hosting countries have resorted to different approaches in responding to the issue. In most cases, responding countries take a defensive approach towards the refugees, and the international refugee law regime itself is not enough to ensure their protection due to its weak enforcement mechanism. However, there are some exceptions. Some countries have set benchmarks in responding to the refugee crises by going beyond their legal obligations. This paper has analyzed the international legal framework on refugee protection, explored the responses by Germany, Turkey, Uganda, and Colombia, and attempted to identify their good practices that can be role models for other refugee hosting states. While comparing the approaches of the four states, the study found that, inter alia, the economic condition of a refugee hosting country is not a barrier to ensuring the rights of the refugees, the conventional humanitarian approach is evolving into an integration strategy, and the willingness of the hosting state is more significant than its legal obligation. Based on the findings, the paper has made recommendations that can be guidelines for the refugee hosting states in responding to the refugee crisis.

Keywords: human rights, refugee crisis, refugee convention 1951, principle of non-refoulement

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1. Introduction

In the entire world, 89.3 million individuals have had to leave their homes. Approximately 27.1 million of them are refugees, with about half of them being below the age of 18.¹ There has always been a lack of integrated approaches to assist refugees, and we haven't learned anything from the inadequate solutions to the refugee situation brought on by the Nazi holocaust. This pattern is still present today. Strict restrictions make it unlikely that everyone will find safety. Some people's migration to a secure nation may never happen because of lengthy waiting lists. Our statements of condolence are heard by all of them, but nothing more.² ever, some States are responding to the global refugee crises extraordinarily either by going beyond the obligations under international instruments or by adapting innovative approaches to combat the refugee crises. This paper has attempted to find out the best approaches practiced by the refugee hosting States.

2. International Legal Framework on Refugee

2.1 The Refugee Convention 1951

Defining the term 'refugee'

Convention Relating to the Status of Refugees 1951 is the prime international legal instrument governing the global refugee rights protection framework. The CONVENTION has defined refugee as an individual who:

owing to well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group or political opinion, is outside the country of his nationality and is unable or, owing to such fear, is unwilling to avail himself of the protection of that country; or who, not having a nationality and being outside the country of his former habitual residence as a result of such events, is unable or, owing to such fear, is unwilling to return to it.³



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¹ 'Figures at a Glance' (UNHCR) <<https://www.unhcr.org/figures-at-a-glance.html>> accessed 29 October 2022.

² Dr. Ewelina U. Ochab, 'We Cannot Look Away from The Global Refugee Crisis' (*Forbes*, 28 January 2022) <<https://www.forbes.com/sites/ewelinaochab/2022/01/28/we-cannot-look-away-from-the-global-refugee-crisis/?sh=6549f7ce55fe>> accessed 29 October 2022.

³ Convention Relating to the Status of Refugees (adopted 28 July 1951, entered into force 22 April 1954) 189 UNTS 137 (Refugee Convention) art. 1.

Rights of the Refugees

Regarding the particular rights of refugees, the Convention lays out three-folds treatment: (1) national treatment, which is the equal treatment provided to own citizens; (2) most-favored-nation treatment, in which the most favorable protection afforded to citizens of a different nation; and (3) "treatment as favorable as possible, and in any case not less favorable than that conferred to aliens ordinarily in the same instances." (Weis 1982).

In terms of rights related to religious freedom,⁴ protection of industrial properties and intellectual property rights,⁵ access to the Courts,⁶ wage earning employment subject to conditions,⁷ access existing rationing system which is applicable to population in general,⁸ elementary education,⁹ public relief,¹⁰ social security and labour welfare,¹¹ tax burden¹² the refugees shall be entitled to equal treated rendered to the citizens of the State of refuge.

Refugees are also provided with several rights as favorable as that of conferred to the foreign nationals. The rights are pertaining to immunity from reciprocity of law subject to condition of three years residence,¹³ in respect to the purchase of mobile and immovable property, as well as other related rights,¹⁴ regarding trade unions and nonpartisan, nonprofit organizations,¹⁵ the ability to pursue a job that provides a living.¹⁶

Principle of Non-Refoulement

One of the significant features of the Convention of 1951 is the principle of non-refoulement.¹⁷ Any individual who qualifies as a refugee under the 1951 Convention, that is, anybody who satisfies the criteria set out in Article 1A (2) of the 1951 Convention and is not covered by one of its exclusion provisions, is protected from refoulement under Article 33(1).¹⁸ Given that someone is a refugee within the meaning of the 1951 Convention as soon as they meet the requirements outlined in the meaning of a refugee, the assessment of an individual's status as a refugee is declaratory in nature i.e., an individual is acknowledged as a refugee since they already qualify as one.¹⁹ This means that the non-refoulement principle also extends to those whose status as refugees has not yet been publicly proclaimed. As such individuals may be refugees, it is a well-established rule of international refugee law that they should not be sent back or expelled until their status has been determined for sure.²⁰

The core of safeguarding asylum seekers is the non-refoulement principle since it is the sole assurance that refugees won't be subjected to the same persecution that drove them to flee in the first place and addresses their desire to enter the nation offering asylum. However, it does not ensure admission to the processes for receiving refugee status or admittance to the domain of the destination State. (Trevisanut 2008).

Cessation of the Refugee Status

A person who has been granted refugee status in accordance with Article 1A (2) of the 1951 Refugee Convention may nonetheless lose that status if he or she is subject to the 1951 Refugee Convention's cessation provisions (Article 1C). The clauses have two parts. The first comprises the first four clauses in Article 1C, which deal with alterations in the refugee's individual circumstances brought on by his own activities, which lead to his gaining national protection and negating the need for refugee status. The second deals with the final two provisions of Article 1C that deal with modifications to a refugee's actual situation that render international protection no more appropriate. (Islam and Jahid 2013) As per the said provision, refugee status of an individual ceases if he has deliberately retained his protection from the State of his nationality,²¹ or voluntarily regained it again,²² or obtained a new nationality and is now under the protection of the State of new citizenship,²³ or voluntarily returned to the nation he fled or outside of which he remained due to fear of being persecuted,²⁴ allowed to return to the nation of his previous habitual residence since the conditions connected with which he was recognized as a refugee have ended.²⁵

⁴ Convention (n 3) art. 4.

⁵ *ibid* art. 14.

⁶ *ibid* art. 16.

⁷ *ibid* art. 17.

⁸ *ibid* art. 20.

⁹ *ibid* art. 22.

¹⁰ *ibid* art. 23.

¹¹ *ibid* art. 24.

¹² *ibid* art. 8.

¹³ *ibid* art. 21.

¹⁴ *ibid* art. 13.

¹⁵ *ibid* art. 15.

¹⁶ *ibid* art. 17.

¹⁷ *ibid* art. 33.

¹⁸ 'Advisory Opinion on the Extraterritorial Application of Non-Refoulement Obligations under the 1951 Convention relating to the Status of Refugees and its 1967 Protocol' (UNHCR) <<https://www.unhcr.org/4d9486929.pdf>> accessed 20 October 2022

¹⁹ *ibid*.

²⁰ *ibid*.

²¹ Convention (n 3) art. 1C.

²² *ibid*.

²³ *ibid*

²⁴ *ibid*.

²⁵ *ibid*.

Exclusion from Protection

The 1951 Refugee Convention's exclusion clauses contained in Articles 1D, 1E, and 1F, deal with individuals who may have been refugees but are not eligible for refugee status for a variety of reasons. These provisions served to safeguard national sovereignty, respect humanitarian commitments, and promote morality on a global scale. (Islam and Jahid 2013) The said provisions excludes individuals who are currently enjoying protection or aid from UN organizations or agencies apart from the UN High Commissioner for Refugees,²⁶ an individual who has been given official recognition by the appropriate authority of the country he has moved to as having the privileges and duties associated with having that state's citizenship, persons who have violated the UN's goals and values,²⁷ committed severe non-political crimes outside of their country of asylum before being admitted there as refugees,²⁸ or who have perpetrated crimes against peace, war crimes, or crimes against humanity.²⁹

2.2 UNHCR Handbook

Handbook on Procedures and Criteria for Determining Refugee Status under the 1951 Convention and the 1967 Protocol relating to the Status of Refugees

Regarding Cessation Clause

If a person meets the requirements of one of the termination provisions, his or her status as a refugee is terminated. The necessity to provide refugees the certainty that their status won't be continuously reviewed in light of momentary changes - not of a fundamental nature - in the circumstances existing in their place of origin has led to this stringent approach to the assessment of refugee status (UNHCR 1979). Further, the cessation provisions are exhaustively listed and are of a negative nature. No other analogous justifications may be presented to support the revocation of refugee status; hence they should be read strictly. It goes without saying that there will be no obligation to continue to provide a person refugee status and international protection if he no longer chooses to be designated a refugee (UNHCR 1979).

Refugee Status Assessment Procedure in Brief

The procedure for gathering and assessing the facts may be summed up as follows:

Responsibility of the applicant

- 1) Be truthful and fully cooperate with the examiner in order to establish the facts of his case;
- 2) Try to provide proof to back up his claims if any are available, and provide an adequate justification if there isn't any, and he must try to get further evidence if required;
- 3) Provide the examiner with as much information about himself and his prior experience as is required to allow the examiner to establish the essential facts. He should be questioned and requested to provide a thorough justification for each justification cited in favor of his request for refugee status (UNHCR 1979).

Duty of the examiner

- 1) Make sure that the petitioner makes his argument as thoroughly and with all pertinent evidence as feasible;
- 2) Determine the objective and subjective components of the case by evaluating the evidence and the individual's credibility (where required, extending the petitioner the benefit of the doubt);
In order to determine the applicant's refugee status correctly, one must
- 3) relate these components to the pertinent 1951 Convention requirements (UNHCR 1979).

3. Exploration to the Approaches of Different Refugee Hosting States

For the purpose of this study, four countries are chosen namely, Turkey, Colombia, Uganda, and Germany. These four countries are selected because of two reasons. First, these are among the top five refugee hosting nations in the world.³⁰ Second, these four States are geographically located in four different continents.

3.1 Germany

Response to Syrian Refugee crisis in 2015

The year 2015 is referred to as the "Year of the Refugee Crisis in Europe" because it saw the highest number of unauthorized migrant incursions from Turkey to Europe through the Eastern Mediterranean route. Many European nations responded by stepping up border security. (Ayoub 2019) However, Germany took the opposite stance. The Dublin Regulation was suspended in Germany and borders were opened as a response. The volume of asylum petitions lodged in 2015 demonstrates how its flexible and embracing policies encouraged increased infiltration. (Ayoub 2019)

Stepped beyond the legal obligation

While other EU countries were also legally responsible for the refugees as per the Dublin Regulation, which mandates that asylum seekers must be reported in the first safe EU member State they arrive, Germany let the individuals to enter the country before having their asylum requests reviewed.³¹ Germany's approach to the refugee crisis appeared to less likely be affected by its legal commitments. As seen by history, Germany's laws have often followed rather than prescribed the course of action the country

²⁶ Convention (n 3) art. 1D.

²⁷ ibid art. 1E.

²⁸ ibid art. 1F.

²⁹ ibid art. 1F.

³⁰ 'UNHCR's Refugee Population Statistics Database' (UNHCR) <<https://www.unhcr.org/refugee-statistics/>> accessed 21 October 2022.

³¹ Christoph Hasselbach, 'Five years on: How Germany's refugee policy has fared' (*Deutsche Welle*, 25 August 2020) <<https://www.dw.com/en/five-years-on-how-germanys-refugee-policy-has-fared/a-54660166>> accessed 22 October 2022.

wants to take. Germany has evolved its asylum policy and approach over time, with the laws often being influenced by the necessities of the country and its population at the time. It is probable that Germany's liberal response to the Syrian refugee crisis was influenced by another force given how flexible the law is. (Momin 2017) Germany's decision to accept 1.1 million Syrian refugees may have been influenced significantly by its moral obligation arose from its role in Second World War. (Momin 2017) Even though there was a ripple effect, the Bundestag's plenary proceedings shows that Germany still feels its deeds on the international arena had an impact on the refugees it accepted into its borders presently. (Momin 2017)

State of the refugees at present

The assimilation of this group is outstanding as of 2020. In Germany, as of December 2018, there were 1.8 million individuals having a history of refugee status. About half of them have secured employment, paid training, or an internship by 2020. Upon arrival, just 1% of refugees claimed to speak German well or very well. By 2018, that percentage had risen to 44%. (Keita and Helen 2020) Despite advancements, barriers still stand in the way of refugees' complete economic integration. Due to the labor market's complexity and bureaucracy, non-German speakers and those with overseas credentials face difficulties. (Keita and Helen 2020) In most of the cases, German businesses are still hesitant to accept foreign credentials. If immigrants don't have the necessary credentials, they can apply to demonstrate their abilities in an interview, but they must speak fluent German to do so, which is more difficult for people in their 40s than for youngsters. (Oltermann 2020)

3.2 Uganda

A developing country hosting one of the highest numbers of refugee

Uganda is hosting highest number of refugees in Africa and third highest in the world. Majority of these refugees came from its neighboring countries where armed conflicts are common. Although Uganda is facing several serious barriers, its refugee policies are quite liberal and progressive, which is rare among the developing nations. (Ahimbisibwe 2019) According to UNHCR, Refugees are welcomed in Uganda. Uganda is exceptional in the area for not having a campsite policy, and the acceptance rate is one of the global highest. Absolute mobility rights and the ability to dwell wherever are given to refugees. In the settlements, land is given to the refugees so they can cultivate it for a living. According to government policy, refugees who want to live in cities must be self-sufficient; if they are incapable of doing so, they must live in a settlement.³²

Progressive Laws and Policies for refugees

In contrast to its neighbors and other African nations, Uganda has liberal refugee policies and regulations. Although there are certain restrictions on Uganda's refugee policies and legislation, the nation is generally seen as welcoming and accessible to refugees. It has received appreciation from all across the world. (Ahimbisibwe 2019)

The 2006 Refugee Act and the 2010 Regulations grant refugees the right to employment and the ability to open their own enterprises. To what extent refugees are free from needing a work permit, there is considerable legal uncertainty and confusion within various elements of the government. In reality, there are considerable differences in the economic options available to refugees depending on whether they work in formal or informal settings, have access to money for production, and are situated in rural or metropolitan locations. (Ruauadel and Susanna 2017) Refugees have access to land under the provisions of the 2006 Refugee Act and the Refugee Regulations, although they are not allowed to possess the residences or agricultural land on which they live or work. (Ruauadel and Susanna 2017)

Adaption of integration approach

In conventional approach, assistance is given to refugees in order to fulfill their urgent needs, but as soon as the urgency is over, interest in their plight erodes and it gets harder and harder to raise funds to help them. The conventional humanitarian response strategy leaves refugees in a state of "limbo" where they are unable to leave their host nations and are also unable to start over there. These factors have caused a change in perspective on managing refugees, moving it away from a simply humanitarian response and toward an integrated development strategy. In the latter, services for both refugees and host communities are blended, and refugees are encouraged to become self-sufficient.³³

As a global pioneer in the implementation of an integrated strategy to refugee management, Uganda ensures that refugees have access to the same services and rights as natives. Both refugees and host communities have prospered from this strategy: the former have access to land and (limited) prospects for employment, while the latter gain from better services for all and the good impact of refugees on the regional and national economies.³⁴

3.3 Turkey

Turkey's response to Syrian Refugee Crisis

At present, Turkey is hosting highest number of refugees in the world.³⁵ Turkey accepted all of the Syrian refugees escaping the conflict started in 2011 with an unquestioning "open door policy." They weren't treated as legitimate refugees at the outset of the conflict; rather, they were viewed as "guests." (Aras and Zeynep 2015) However, the word "guest" has no position in international law concerning refugees. Since then, the number of refugees as well as objections has increased. In 2014, Turkey created a "temporary protection system (TP)" and adapted the Temporary Protection Regulation. The Regulation provides Syrians with the right to temporary asylum while they await relocation to third-party safe countries. The Council of Ministers' resolution establishes

³² Submission by the United Nations High Commissioner for Refugees for the Office of the High Commissioner for Human Rights 'Compilation Report- Universal Periodic Review: Uganda' (UNHCR, 2011) <<http://www.refworld.org/pdfid/4d806bc112f.pdf>> accessed 20 October 2022.

³³ Iffat Idris, 'Integrated approaches to refugee management in Uganda' (2020) Helpdesk Report 716 <<https://opendocs.ids.ac.uk/opendocs/handle/20.500.12413/14991>> accessed 20 October 2022.

³⁴ *ibid.*

³⁵ 'UNHCR's Refugee Population Statistics Database' (UNHCR) <<https://www.unhcr.org/refugee-statistics/>> accessed 21 October 2022.

the duration of temporary protection. The explicit description of their legal position, as evidenced by their identity cards, rights, and accumulated social support, is the regulation's most significant feature. (Aras and Zeynep 2015)

Humanitarianism with selective focus

The temporary-resident classification, created specifically for Syrians, exemplifies both a practical and selective approach to humanitarian aid. The category emphasizes Turkey as a compassionate polity with a duty to people from its imperial history and taps into the collective memory of Turkish society. The selective application of safeguards also demonstrates that, rather than a general humanitarian attitude toward refugees in Turkey, it qualifies refugees for the degree of acceptance and safeguarding as its inherent traits. (Korkut 2016)

Labelling the refugees as 'guest'

The Syrian crisis is not the first instance Turkey has referred to a population of refugees as "guests." All prior refugee populations to whom the term "guest" was given, including Iraqis in 1988, Bosnians in 1992, Kosovars in 1998, and Chechens beginning in 1999, received the same treatment from Turkey. (Abdelaaty 2019) Turkey can choose to participate in or not participate in what might otherwise seem to be generally applicable, national-level regulations by refusing to categorize specific people as refugees or asylum seekers. The term "guest" excludes a group of refugees from the regular application of the law, whether it is used in reference to a huge inflow or not. As a result, the Turkish government is capable of treating some groups preferentially while discriminating against others who would otherwise have the same legal standing. Turkish authority has applied the term "guest" to favor some refugee groups while distinguishing others for poor treatment in response to foreign policy considerations as well as domestic identity politics. (Abdelaaty 2019)

3.4 Colombia

Generosity towards the refugees and limitation of Colombia

By the spring of 2021, Colombia had hosted 5.5 million Venezuelan refugees, the bulk of whom had arrived since 2015. When faced with this record inflow of migrants and refugees, Colombia has taken a comprehensive approach, beefing up efforts to manage the migratory issue made worse by the COVID-19 epidemic and making special measures to lessen the impact on the host communities.³⁶

However, Colombia is one of the least prepared nations in Latin America to accept a large-scale migrant influx in other ways. The country had some of the greatest rates of forcible displacement in the world over the course of decades, and millions of migrants and refugees were driven out as a result. Colombia has never before hosted these many migrants, and it is obvious that it lacks the knowledge and resources to do so. Due to a lack of formal options, Venezuelans frequently accept salaries that are far less than those paid to locals in the country's cash-based informal sector, which accounts for nearly half of all employment.³⁷

Smart approach to integrate

The majority of the unregistered Venezuelans living in Colombia, who landed since 2015 when the mass influx of Venezuelans all across the continent intensified, were ordered to be formalized before President Juan Manuel Santos left office in August 2018. (Bahar, Dooley, and Huang 2018) This allowed them to obtain resident status and employment permits. This admirable initiative is the most significant effort at regularizing migrant and refugee labor in the continent, probably at the global level after Uganda. Given the huge economic potential that these migrants could bring to the country, it is not only a good way to show support for its Venezuelan neighbors but also a smart thing to do. (Bahar, Meagon and Cindy 2018) The UNHCR, the UN Refugee Agency, and IOM, the International Organization for Migration, applauded Colombia's decision to grant ten-year provisional safeguard scheme to Venezuelans staying within its territory.³⁸

4. Comparative Analysis of the Approaches

A comparison of the responses of the four States found that Uganda has taken an extraordinary approach by adapting the integration strategy as opposed to the standard humanitarian response strategy. It provides a relatively more sustainable solution to the refugee crisis as it allows refugees to become self-reliant rather than stuck in a never-ending cycle of dependence on external aid. On the integration front, Colombia has moved in the direction of Uganda, most notably with the regularization of Venezuelan migrants, but its efforts have been hampered by limited institutional readiness and a large informal economy that continues to disadvantage refugees on wages and job security. Rather, Germany and Turkey have pursued the traditional humanitarian approach, each with its own distinctive character. Germany's response has been largely focused on asylum processing and social assistance, rather than a structured integration framework, leaving refugees to negotiate economic inclusion themselves and the recognition of foreign qualifications as a challenge for many. The Turkish approach is also complicated by its practice of selective and politically motivated labelling, whereby refugees are labelled as 'guests' and not recognized under the standard legal category, a distinction that gives the state discretion in granting or withholding protection on the basis of foreign policy and domestic considerations.

Moreover, it is also evident that these four States have come out of the other States which have imposed restrictions and strengthened border security to control refugee influx by accepting the refugees with liberal and amicable policies and measures. There is a

³⁶ 'Supporting Colombian Host Communities and Venezuelan Migrants During the COVID-19 Pandemic' (*The World Bank*, 31 October 2021) <<https://www.worldbank.org/en/results/2021/10/31/supporting-colombian-host-communities-and-venezuelan-migrants-during-the-covid-19-pandemic>> accessed 20 October 2022.

³⁷ 'Hard Times in a Safe Haven: Protecting Venezuelan Migrants in Colombia - Latin America Report N°94' (OCHA, 09 August 2022) <<https://reliefweb.int/report/colombia/hard-times-safe-haven-protecting-venezuelan-migrants-colombia-latin-america-report-ndeg94-9-august-2022>> accessed 20 October 2022.

³⁸ 'UNHCR and IOM welcome Colombia's decision to regularize Venezuelan refugees and migrants' (UNHCR, 08 February 2021) <<https://www.unhcr.org/news/press/2021/2/60214cf74/unhcr-iom-welcome-colombias-decision-regularize-venezuelan-refugees-migrants.html>> accessed 20 October 2022.

commonality in the willingness of the four States to depart from the restrictive norm adopted by the majority of other host countries, although the motivations behind this and the resulting frameworks are quite different.

Moreover, the reasons for allowing mass influx are not the same for the four States. Germany and Turkey, respectively, for historical and political reasons and Uganda's response appears to be based on regional solidarity and Colombia's on a shared history of migration with Venezuela. This difference in motivation means that the liberal refugee policies do not spring from a common unifying legal or moral principle but are instead the product of each State's own historical relationship with the country producing refugees. One common challenge for all these refugee hosting States is to provide employment opportunities for the refugees. Thus, legal generosity, however wide, is not necessarily a guarantee of economic security for the refugees it is intended to protect.

5. Major Findings

The major findings of the study are

Readiness is more important than the legal obligation of the States

The four countries analyzed in this study have all exceeded their legal obligations under international and regional instruments to support refugees. Germany suspended the Dublin Regulation and opened its borders, with no binding international rules mandating it to do so; Uganda provided refugees with land, mobility and the right to work far beyond the requirements of the 1951 Convention or regional instruments; Turkey created an entirely new legal category, temporary protection, to accommodate Syrians outside the existing refugee framework; and Colombia formalized the status of millions of undocumented Venezuelans thru executive initiative rather than treaty compulsion. This pattern indicates that the presence of a legal obligation is not per se a reliable predictor of the State's response to a refugee influx. It seems rather that the decisive factors are political will, historical memory and domestic policy choices. The finding also reveals a structural weakness in the international refugee law regime itself: the protection actually offered to refugees is much more dependent on the disposition of the hosting State itself than on its treaty commitments, as there is no strong enforcement mechanism in the Refugee Convention.

Developing economy is not the unbeatable barrier to handle the refugee crisis

Take the Ugandan approach to the refugees for the best example. Uganda is a poor country but has responded to the refugee crisis in the best way and is hosting one of the highest number of refugees in the world. This is an important finding because it undermines a frequent argument made by richer host States that their resources constrain their ability to provide protection. Uganda's settlement-based land allocation policy and its refusal to adopt a campsite model show that resource constraints can be managed thru policy design, rather than using them as a basis for restriction. The economic argument often made by wealthier States to justify restrictive policies is severely undermined if a developing country with limited institutional capacity is able to implement one of the most liberal refugee regimes in the world.

The responses to the refugee crisis have evolved

The paradigm is moving away from the traditional humanitarian approach toward the integration strategy. Uganda can be a model for the developing world in this regard. Colombia's move to regularize Venezuelan migrants also shows that this change is not only in Africa but is gradually taking place across continents. Germany and Turkey, in contrast, are still heavily dependent on the traditional humanitarian model which, as the comparative analysis shows, does not lead to self-sufficiency in the long run but to refugees being stuck in a state of long-term limbo. This divergence suggests that the move toward integration is neither universal nor complete, but rather, for the moment, an emerging trend rather than an established norm.

All four states continue to deal with the common problem of unemployment

Germany, Turkey, Uganda and Colombia all struggle to turn legal entitlement into real economic opportunity for refugees, no matter how generous the underlying policy. Even in the most refugee-friendly regimes, bureaucratic obstacles, non-recognition of foreign credentials, language barriers, and dependence on informal, low-paying labor markets persist. It demonstrates that legal liberalization alone is not sufficient for real integration without supporting reform of the labor market.

6. Conclusion

The global refugee crisis is getting worse as the current humanitarian approach has not been successful in the long term to address the crisis. Huge funding is also necessary for the humanitarian approach which is burdensome for the hosting State especially if it is a developing country. The Hosting States in collaboration with UNHCR need to move toward the integration approach which the study has shown to yield more sustainable results for both refugees and host communities. UNHCR should research the methods, impacts, effectiveness, efficiencies and feasibility of best practices in other refugee hosting countries. Periodically, detailed reports on best practices should be published, and not just confined to policy circles, but distributed to the domestic legislatures and civil society organizations of the hosting States so that the findings inform actual policy making rather than remaining a matter of academic record. The international community and UNHCR should also consider mechanisms to promote political willingness among host countries, whether thru diplomatic recognition, development assistance or preferential trade arrangements, so that the burden of hosting refugees does not fall disproportionately on countries that have greater moral or historical motivation. Since the willingness of the state is now the most important factor. Since employment has been identified as a long-standing barrier in all four jurisdictions, hosting States should give priority to credential-recognition schemes, vocational training and language-support programs, as legal entitlement without economic access offers only a partial solution. Finally, there isn't one size fits all solution to global refugee crises. Each crisis must be treated on its own merits, considering the geographical location, demography, economy and socio-cultural factors of the host States. Best practices can only be a guidance for the hosting States as they respond to the refugee crises. The best practices need to be adapted and modified to the socio-economic context of the hosting states, bearing in mind that a policy that works in one context (such as Uganda's integration model) may need to be substantially recalibrated to be meaningfully transplanted into another.

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