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## **Social Security Rights of Turkish Citizens Abroad**

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### **A. Introduction**

Providing the social security right for Turkish citizens staying abroad is of great importance especially in terms of health practices and ensuring income security in the future. Providing sustainability to the social security right of the Turkish citizens outside Turkey is essential particularly regarding these fields.

Providing the social security right is basically the responsibility of the country of residence and work, depending on citizenship. This responsibility of the country of citizenship remains in cases where a citizen is temporarily or permanently outside the country. Accordingly, the mobile life in an increasingly interconnected world leads to social security rights gaining an international dimension and national regulations to be directed towards not only citizens staying within the borders of the country, but also abroad.

The international dimension of social security regulations has gained increasing importance in recent years especially for Turkish citizens. The main reason for this is that Turkey continues to be a labour exporting country and the number of Turkish citizens living abroad is gradually increasing: about 5.5 million of the more than 6.5 million Turkish citizens living abroad have settled in Western European countries. Thus, also considering the three million Turks that have made a definite return to Turkey, the existence of a migration phenomenon that concerns about 9.5 million people has emerged. Accordingly, meeting the social security of

the Turkish citizens in question and solving their problems are treated as an priority issue by Turkey's foreign policy<sup>1</sup>. Hence, Turkey has currently signed social security agreements with 35 countries, including the countries of the European Union<sup>2</sup>.

The emigration of Turkish citizens covers a period that has been intense since the 1960s to the present day. In this context, first, what should be understood from a Turkish citizen abroad will be explained below and then, the social security rights of Turkish citizens working and not working abroad in Turkey will be examined. Hereunder, the social security rights that Turkish citizens acquire abroad according to the legislation of the country they reside in are out of our scope.

## B. The Concept of Turkish Citizens Abroad

### I. Reason for being abroad

An important part of Turkish citizens abroad are people working in foreign countries. However, Turkish citizens abroad but not working in the foreign country they reside in are also included in the concept of Turkish citizens abroad.

In this context, Turkish citizens working in foreign countries may be separated into three groups, namely those who are sent abroad on temporary duty while working in Turkey, those who are moving abroad to be employed by a Turkish employer in a foreign country, and Turkish citizens who go to a foreign country to work and settle there. Turkish citizens who are abroad unemployed mainly go abroad for family reasons, educational or touristic or sporting purposes or settled abroad permanently.

### II. Carrying Turkish citizenship

Everyone who is bound to the Turkish State by citizenship is Turkish. The child of a Turkish father or a Turkish mother is Turkish. Citizenship is acquired under the conditions specified by the law and is lost only in cases specified in the law (art. 66 of the Constitution). Accordingly, Turkishness is defined in the Constitution without any distinction of language, religion, race or sect, and the Constitution did not seek the condition of being Turkish in the racial sense to bind individuals to itself by citizenship bond.

In the Turkish Citizenship Law No. 5901<sup>3</sup>, a Turkish citizen is defined as a person who is bound to the State of the Republic of Turkey by citizenship bond (art. 3/ç). While the law accepts the acquisition of Turkish citizenship due to the lineage as a basis for the acquisition of citizenship by birth, it regulates being born in Turkey based on land as an exception to acquiring citizenship (art. 8). The subsequent acquisition of Turkish citizenship takes place with the decision of

1 [www.mfa.gov.tr/yurtdisinda-yasayan-turkler\\_tr.mfa](http://www.mfa.gov.tr/yurtdisinda-yasayan-turkler_tr.mfa)

2 See: [www.sgk.gov.tr/wps/portal/sgk/tr/emekli/yurtdisi\\_islemler/sosyal\\_guvenlik\\_sozlesmeleri](http://www.sgk.gov.tr/wps/portal/sgk/tr/emekli/yurtdisi_islemler/sosyal_guvenlik_sozlesmeleri)

3 Official Gazette 12.6.2009 no. 27256

the relevant authority or through adoption or the exercise of the right to choose (art. 9). Furthermore, it is possible to acquire Turkish citizenship through marriage or by decision of the President (art. 12, 16).

Additionally, according to Law No. 2383<sup>4</sup>, Turkish citizens have the right to have the citizenship of one or more states. Today, dual citizenship gains attraction in the face of Turkey's opening to the outside along with developments in the field of international transportation and communication. Dual citizenship gives a new dimension to the concept of citizenship: people staying abroad can maintain their own country's citizenship and in certain cases can acquire the citizenship of the country they are residing in. It leads to the emergence of the concept of Turkish citizens abroad. Thus, Turkish citizens permanently or temporarily outside of Turkey for work, family, education, touristic, sportive, or other reasons, whilst maintaining their Turkish citizenship status may be defined as Turkish citizens abroad.

### *III. Protection of Turkish citizen abroad*

The Constitution stipulates the State's obligation to take the necessary measures to ensure the social security of Turkish citizens working in a foreign country, to protect their ties with the homeland, and to assist them in returning home (art. 62). Within the national legislation, Law No. 3201<sup>5</sup> is an important legal regulation corresponding with the mentioned obligation. As a matter of fact, the Law No. 3201 addresses the prerequisites for Turkish citizens to count the time period they are abroad to the period of insurance in Turkey.

However, neither the Constitution nor the Law No. 3201 have defined the Turkish citizen abroad. Hence, it would be appropriate to consider every Turkish citizen anywhere in the world – for whatever reason – to be considered a Turkish citizen abroad<sup>6</sup>.

## **C. Social Security Status of Turkish Citizen Working Abroad**

### *I. Status of Turkish citizens permanently abroad*

#### 1. Opportunity to benefit from Turkish social security legislation

While some of the Turkish citizens working abroad permanently solely possess a Turkish citizenship, some also hold the citizenship of the country in which they reside. Depending on their citizenship status and employment, these individuals may be subject to both the Turkish social security legislation and the social security legislation of the country in which they reside.

In fact, Turkish citizens working abroad, regardless of whether there is a bilateral or multilateral social security agreement, benefit from the rights recognized by the social security legislation of the country in which they reside in. Countries,

4 Official Gazette 17.2.1981 no. 17254

5 Official Gazette 22.5.1985 no. 18761

6 Demirkaya (2020), p. 10

in accordance with the principle of equality, are under the obligation of providing Turkish citizens in their countries with social security rights like of the ones their own citizens enjoy. However, this is not our subject; it is of interest to us whether these people, whether they hold solely a Turkish or a dual citizenship, can claim a pension, death, or disability pension according to Turkish social security legislation.

## 2. Evaluation of working time spent abroad

### a) Recent developments

Turkey has adopted two fundamental laws regarding the evaluation of the working time spent abroad by Turkish citizens working abroad. Indeed, legal arrangements had to be made to ensure the social security of Turkish citizens abroad in the face of adverse circumstances such as the difficulty of making social security agreements, the inability of the agreements to fully provide the social security rights of Turkish citizens working abroad, and the inability to sign social security agreements with all foreign countries.

The first of these fundamental laws mentioned above is the law dated 30.5.1978 and numbered 2147<sup>7</sup>. The law in question introduced the opportunity to borrow the entire period of service abroad for Turkish citizens who have worked or are working in all foreign countries, regardless of whether they have a bilateral or multilateral social security agreement.

However, Law No. 2147 could not provide sufficient solutions to the problems that arose in practice during the seven years it was in force. Particularly implementation problems arising from the fact that the service periods cannot be partially borrowed with the condition of a final return to the country necessitated the repeal of the law in question. Thereupon, Law No. 3201 of 8.5.1985<sup>8</sup>, which replaced the Law No. 2147 and is still in force, was adopted.

In the period following the entry into force of Law No. 3201, the situation of those who receive unemployment insurance and other social security benefits from abroad created problems in terms of implementation. In this context, the Constitutional Court found that the words „those who make a final return to the country” and „return to the country” in Article 3 of the Law No. 3201 were contrary to the Constitution and annulled them. However, the Constitutional Court did not find the condition of final return to the country, which is a prerequisite in Article 6 of Law No. 3201 regarding the granting of a pension, contrary to the Constitution.

Article 3 of Law No. 3201 was rearranged after the annulment decision of the Constitutional Court, and the condition that the application should be made within two years from the final return to the country with the condition of a final return to the country was repealed. However, the requirement for the final return to the country, stipulated for the granting of a pension, was left untouched in article 6 of Law 3201. For this reason, a person working abroad can make a service loan

7 Official Gazette 7.6.1978 no. 16309

8 Official Gazette 22.5.1985 no. 18761

without a final return to the country; however, he/she cannot receive a pension without making a final return<sup>9</sup>.

b) Persons who will benefit from foreign service debt

(1) Turkish citizens over the age of 18

The time spent abroad as a Turkish citizen after turning the age of 18 of those who lost their Turkish citizenship by obtaining permission to leave after being a Turkish citizen by birth and the time spent by Turkish citizens abroad are evaluated in terms of their social security (art. 1 Law No. 3201). Accordingly, the condition of being a Turkish citizen at the time of the request will not be sought, however, the request will have to include the period of being a Turkish citizen<sup>10</sup>. Thus, the periods spent abroad after the loss of Turkish citizenship will not be subject to borrowing.

Likewise, immigrants arriving in Turkey, even if granted Turkish citizenship, will not be able to make borrowing because they were not Turkish citizens during the time working abroad<sup>11</sup>. However, those who were subject to forced migration (e. g. of Turkish descent, but Bulgarian citizens in the past) were excluded from this rule. Accordingly, those who acquired Turkish citizenship after being subjected to forced migration from countries that have not signed a social security agreement from 1/1/1989 to 8/5/2008 will be able to evaluate their service period in the countries they came from through borrowing (art. 6 Law No. 3201).

(2) Housewives living abroad

After turning the age of 18, Turkish citizen can borrow the period spent abroad as a housewife (art. 1 Law No. 3201). In this context, the expression housewife should be understood as women who are over the age of 18 and do not work in any job, regardless of whether they are married or have any occupation<sup>12</sup>.

(3) Public officials

Public officials insured after 1/10/2008 have the opportunity to make borrowing for the periods spent abroad before this date (prov. art. 7 para. 2 Law No. 3201).

(4) Right holders

Rights holders of those who died while working abroad or after their final return to the country can benefit from foreign service debt. However, in order to achieve such benefit, the right holder must be a Turkish citizen (art. 3 para. 1 Law No. 3201). There is no legal clarity as to whether the right holder should be a Turkish citizen at the time of borrowing or during the entire period of borrowing.

9 Ergin (2009), p. 169

10 Sözer (2019), pp. 486–487

11 Çelebi (2017), p. 67

12 See in detail: Çelebi (2017), pp. 79–81

### c) Borrowing periods

The periods of insurance abroad and the unemployment periods of up to one year between or after these periods and the periods spent as a housewife abroad are the periods that can be borrowed (art. 1 Law No. 3201). Accordingly, the periods worked in a foreign country without insurance or without a work permit will not be subject to borrowing<sup>13</sup>.

Since unemployment periods to be borrowed are limited to one year, it is not possible to borrow all unemployment periods.

If a housewife requests to borrow the time spent abroad, it is not required for the person requesting borrowing to be previously insured in Turkey.

Regardless, Turkish workers who were taken abroad by Turkish employers who took jobs in countries that did not sign a social security agreement with Turkey can benefit from optional insurance if they wish to benefit from long-term insurance branches. Those who do not want to benefit from optional insurance can borrow as much as they wish, for the time they worked abroad<sup>14</sup>.

### d) Required actions

#### (1) Making an application

Citizens applying to foreign borrowing must submit their applications to the Social Security Institution (art. 3 Law No. 3201). Due to a large number of social security institutions in Turkey and the lack of norm-standard unity, the places to apply were arranged in detail. However, with the unification of social security institutions under one roof and efforts to ensure norm-standard unity, today, it has been accepted that the Social Security Institution is the only place of application.

#### (2) Payment of the entire debt

The amount of debt accrued for each day borrowed is 45% of the daily earnings selected between the minimum and maximum daily earnings, which are the basis of the valid premium at the date of application (art. 4 para. 1 Law No. 3201).

However, the President of the State is authorized to set the lower limit for borrowing to a different amount, which he, however, has not done so far.

The amount of the debt must be paid within three months from the date of notification. Thusly, if the debt is not fully paid in due time, it will be necessary to apply again (art. 4 para. 1 Law No. 3201).

On the other hand, payments to those who renounce borrowing afterwards and those who cannot fulfil the necessary conditions for receiving a pension after borrowing and their beneficiaries, upon their request, are refunded without interest (art. 4 para. 2 Law No. 3201).

13 Çavuş (2015), p. 45; Çelebi (2017), pp. 88–89; Ergin (2008), p. 568; Orhan (2007), p. 30

14 Çelebi (2017), pp. 93–94; Yıldırımoglu (2009), p. 256



## e) Legal consequences of borrowing

### (1) Insurance starting date

The borrowing periods of those who have service in Turkey prior to the borrowing date are combined. In this case, if the period of borrowing of the insured abroad coincides with a date after the starting date of the insurance in Turkey, the start of the insurance will not change. On the other hand, if the borrowed period coincides with a date before the starting date of the insurance in Turkey, the starting date of the insurance will be determined by going back as much as the number of days owed. If the applicant does not have insurance in Turkey, the starting date of the insurance is the date determined by going back as far as the number of days it was borrowed from the date the applicant fully paid his debts (art. 5 paras 2, 3, and 6 Law No. 3201).

On the other hand, the date on which those who borrowed their services in the countries in which a drawn up social security agreement commenced for the first time in the contracting country, is not considered as the first date of employment. Correspondingly, if there is a correlating provision in the social security agreement, the date of first employment in a foreign country is accepted as the date of first employment in Turkey (art. 5 para. 5 Law No. 3201).

### (2) Salary

If the insured is entitled to a salary because of the payment of the amount owed, it is obligatory for the insured to make a final return to the country, to have fully paid the accrued debt and to make a written request (art. 6 para. A Law No. 3201).

However, there is no legal provision regarding the requirement of a final return to the country in order for the salary to be added on to the deceased's right holders. Again, a final return to the country does not mean that going abroad again after returning to Turkey will be rendered impossible<sup>15</sup>. However, the salaries of those whom putting on salaries, those who will work abroad subject to the legislation of a foreign country and those who receive residence-based social insurance or social assistance allowance must be cut as of the date they start working again or start receiving the allowance<sup>16</sup>.

The owed salary can come in the form of a partial salary, or a full salary. In this context, partial salary means a salary for Turkish citizens working both in Turkey and abroad only in proportion to their working time in Turkey. However, to earn a partial salary the following requirements exist:

- The working period in Turkey and the number of premium payment days not being sufficient according to the Turkish legislation,
- An existing social security agreement between Turkey and the foreign country where the Turkish insured works and considering the periods during which the Turkish insured worked abroad and paid premiums pursuant to this agreement as premiums paid to Turkish insurance institutions.

<sup>15</sup> Çelebi (2017), p. 154

<sup>16</sup> See: Çelebi (2017), pp. 165–166

Partial salaries can be converted into full salaries upon the request of the Turkish insured or right holders and the full payment of the borrowing amounts can be accrued to them (art. 4 and art. 9 para. 1 Law No. 3201). Hence, it is possible for those who receive partial salaries abroad to convert their partial salaries in Turkey to full salaries<sup>17</sup>.

On the other hand, it is legally possible for persons receiving a salary to start working in Turkey as insured. In this case, the persons in question can continue their work in Turkey without cutting their salaries by paying social security support premium (art. 6 para. B Law No. 3201).

### 3. Refund of transferred premiums

Turkish citizens returning to Turkey without retiring abroad can transfer the insurance premiums they have paid in a foreign country to Turkey if there is a bilateral social security agreement. Accordingly, in the case of a transfer of premiums deposited to social security institutions in foreign countries on account of Turkish citizens to Turkey through international agreements:

- All transferred premiums to those who have paid the accrued debt by borrowing the entire period of the transferred premiums,
- The amount of the transferred premiums corresponding to the period they are borrowed to those who have also paid their accrued debt by borrowing a part of the periods related to the transferred premiums,

are returned to the insured or their right holders or heirs in Turkish Lira at the current exchange rate on the date of transfer (art. 10 Law No. 3201).

## II. Status of a Turkish citizen who is temporarily abroad

### 1. Persons who are temporarily abroad for work purposes

#### a) Those sent abroad by a public institute

Public officials in Turkey can be assigned to the foreign representations or units of the public institutes they are affiliated with. Their social security rights are determined according to the provisions of Law No. 5510. In this context, the social security rights of employees sent abroad by public institutes continue under the existing conditions in Turkey.

Likewise, the social security right of public officials sent abroad for training is protected in terms of long-term insurance branches during their stay abroad. In terms of health insurance, first, the country of residence is relevant, and if the country of residence does not provide health assistance, the relevant Turkish institute takes out the health insurance of these people<sup>18</sup>.

In contrast:

- Employees in foreign representations of public administrations and that have a permanent residence permit in the country where the representation is located

17 See: Çelebi (2017), pp. 162–163

18 See: Demirkaya (2020), p. 162

- or Turkish national contracted personnel that hold the citizenship of their country of residence, documenting that they are insured in the social security institution of the country of residence,
- Those who are insured within the scope of social insurance in the country of residence by their employers, in cases where the relevant legislation of the country where the representative office is located is required and within the framework of international social security agreements of contracted personnel employed in foreign representations of public administrations, are not considered as insured in Turkey (art. 6 para. 1/1 Law No. 5510).

The social security of teachers and religious officials working abroad is provided by the social assistance provided in accordance with the provisions of Law No. 168<sup>19</sup>.

b) Workers who are taken abroad, sent abroad or go abroad through their own means

If there is an existing bilateral social security agreement, and if there is no corresponding provision in this agreement, Article 10 of the Law No. 5510 is applied regarding those who are temporarily taken abroad for the purpose of working as a worker by a Turkish employer who took a job abroad, that is, the social insurance rights and obligations of the insured and the employer continue during the working period abroad<sup>20</sup>.

In the absence of a bilateral social security agreement, the provisions of the Turkish social security legislation shall be valid. However, these people can only benefit from the short-term insurance branches and the provisions of the general health insurance, while the long-term insurance branches are guaranteed only under the provisions of the voluntary insurance<sup>21</sup>.

Those who are sent abroad on temporary duty are subject to the provisions of the Turkish social security legislation, whether there is a bilateral social security agreement or not<sup>22</sup>.

Turkish citizens going abroad to work for a temporary period must participate in the social security legislation of the country in which they reside. However, if there is a special arrangement for them in the bilateral social security agreement, the provisions of such agreement are valid<sup>23</sup>.

c) Self-employed persons in Turkey who go abroad for work

Self-employed persons in Turkey temporarily staying abroad continue to be subject to insurance rights and obligations (art. 10 para. 1 Law No. 5510), and their insurance is cancelled in Turkey<sup>24</sup>. However, Turkish self-employed persons

19 Official Gazette 23.12.1960 no. 10688; See in detail: Güzel/Okur/Caniklioglu (2020), p. 874

20 Sözer (2019), p. 97

21 Sözer (2019), pp. 96–97

22 Güzel/Okur/Caniklioglu (2020), p. 133

23 Demirkaya (2020), p. 174

24 See: Demirkaya (2020), p. 159 fn. 571

who temporarily reside abroad will be able to benefit from optional insurance provisions (art. 50 Law No. 5510), provided that the necessary conditions are met<sup>25</sup>.

## **D. Social Security Status of Turkish Citizens Not Working Abroad**

### *I. Status of a Turkish citizen abroad for family reasons*

Being abroad for family reasons, means the situation where the dependents of a person going abroad accompany that person.

Practices regarding the social security of family members may vary depending on factors such as the existence of a bilateral social security agreement and the provision in this agreement, a possible permanent or temporary residence in the country in question, and the insurance status<sup>26</sup>. However, apart from bilateral social security agreements, there are also some practices arising from Turkish legislation that should be considered.

Thus, general health insurance ends on the date the general health insured transfers the place of residence out of Turkey, without prejudice to the provisions of the social security agreements. However, the general health insurance status of the dependents of the general health insurance holders residing in the country continues if the right to receive income and salary continues for those who are still obliged to pay premiums and those who move their residence abroad are among those who receive income or salary<sup>27</sup>.

On the other hand, workers and public officials with general health insurance who are sent abroad by their employers on permanent duty and their dependents have the right to receive health services abroad (art. 66 para. 1/b Law No. 5510). Besides, health services of general health insurance holders and their dependents who are Turkish citizens and who are in the Turkish Republic of Northern Cyprus for any reason are also covered (art. 66 para. 1/d Law No 5510).

### *II. Status of Turkish citizens who resident abroad*

Turkish citizens that are abroad for the purpose of residence are those who do not work in the foreign country they are in and generally receive income or salary. There is no specific regulation in Turkish legislation regarding their social security rights and practices. However, by comparison, it can be concluded that the individuals in question can receive salary or income from the Turkish social security system, benefit from health services and request service debt.

On the other hand, Turkish citizens who transfer their residence abroad can receive the income and salaries they are entitled to in Turkey in the foreign country where they reside. Thus, permanently residing abroad, without prejudice to the provisions of the international social security agreement, can request the transfer

25 Demirkaya (2020), p. 202

26 Demirkaya (2020), p. 204

27 See: Demirkaya (2020), p. 205 fn. 657

of their income or salaries to foreign accounts, provided that their written requests and expenses are met.

On the contrary, the rights of Turkish citizens who transfer their residence to a country abroad, arising from social security legislation, disappear in some cases. For instance, short-term and long-term insurance are terminated one day before the date of inclusion in the social security system of that country, because they reside in any foreign country (art. 9 para. 1/b-7 Law No. 5510).

Similarly, the voluntary insurance of Turkish citizens who were optionally insured while they were in Turkey, without prejudice to the provisions of the social security agreement, ends as soon as they start residing in a country abroad.

### *III. Status of a Turkish citizen staying abroad for family reasons*

Law No. 1416 mainly deals with the status of Turkish citizens staying abroad for educational reasons. Turkish citizens going abroad for educational reasons on their own means are required to have a comprehensive private health insurance against the treatment expenses and possible risks during their stay abroad. At the same time, it is possible to apply the legal provisions on foreign service debt.

Students who are sent abroad with official scholarships under Law No. 1416 must also take out health insurance. The student's institution pays the insurance fees and health expenses not covered by the health insurance. Likewise, the treatment costs of spouses and children of those sent abroad within the scope of the said law are covered by the relevant institutions (art. 13 para. 2 Law No. 1416).

Nevertheless, students can make service debt in Turkey for the periods they spend abroad as official students. Accordingly, education periods spent abroad for doctoral education or specialization in medicine without being insured can be borrowed upon written request by themselves or their right holders (art. 41 para. 1/d and j Law No. 5510). In this case, the insurance premiums must be paid within one month from the date of notification of the debt. It is necessary to reapply for borrowing that will not be paid within a month (art. 41 paras 1 and 2 Law No. 5510).

### *IV. Status of a Turkish citizen staying abroad for touristic purposes*

Turkish citizens, staying abroad for reasons such as travel, or a family visit, are abroad for touristic purposes. The social insurance rights of those who continue to work or receive salary/income in Turkey while they are abroad continue without interruption during this period. However, the salary or income of those who receive income or salary from these people is cut if they stay abroad for more than six months.

Health care costs incurred by the beneficiaries of general health insurance and their dependents while they are abroad for touristic purposes are not covered by the Social Security Institution, except in the case of being in the Turkish Republic of Northern Cyprus. Covering the said health care costs depends on the existence

of a bilateral social security agreement and the presence of a special provision in this agreement<sup>28</sup>.

#### *V. Status of Turkish citizens staying abroad for sports purposes*

In the Turkish social security legislation, there is no special provision regulating the social security right of Turkish citizens staying abroad for sports purposes such as competitions, matches, tournaments or camps. In this context, private insurances made by insurance companies in Turkey are gaining importance. Thusly, it is seen that protection against health risks is provided especially through private international travel health insurance policies for professional athletes. It should be stated that non-professional athletes enjoy far from adequate protection.

#### **E. Evaluation and Conclusion**

In the face of the increasing number of Turkish citizens staying abroad, social security rights related to their future have been gaining importance. In this regard, a step forward has been through the means of bilateral social security agreements. The increase of bilateral social security agreements signed by Turkey is indicative of the positive developments in question.

Turkish citizens returning to Turkey without earning the right to retire abroad or who want to evaluate their previous work in Turkey can service debt. In this regard, service debt was initially evaluated by the foreign currency coming to Turkey, but later the foreign currency borrowing method was abandoned.

Social security rights of Turkish citizens abroad started to gain importance, because of Turkey being a labour exporting country early on. Thus, with Turkish workers starting to work abroad, the idea of providing them with social security when they returned to Turkey came to the fore. In this regard, bilateral social security agreements have made an important contribution.

Today, the social security rights of Turkish citizens abroad have started to be important in terms of the workers taken from Turkey by Turkish contractors who take jobs. Hereupon, the existence of a bilateral social security agreement reinforces the social security provided. It cannot be said that full and sufficient social security is provided for those working in countries where there is no bilateral social security agreement. In this respect, it is expected that social developments related to this will take place in the future and that social security ought to be strengthened.

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