

Thailand

The Coalition for the Rights of Refugees and Stateless Persons (CRSP) Submission to the UN Committee Against Torture

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INTRODUCTION

The Coalition for the Rights of Refugees and Stateless Persons (CRSP) was formed in 2016 to advocate for the human rights of refugees and stateless people in Thailand. CRSP comprises members from NGOs, INGOs, and individuals who believe in and support refugee and stateless rights. CRSP believes that refugees and stateless people should be able to access their fundamental human rights while living in host countries like Thailand. Refugees and stateless people should be protected under national legislation and be free from forced return to their country of origin. CRSP advocates for all refugees in Thailand, focusing on non-camp refugees.

This submission has been prepared by CRSP as part of our ongoing efforts to address the critical challenges faced by refugees, who are currently residing in Thailand. Despite Thailand's obligations under the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT),¹ as well as the recent implementation of the Prevention and Suppression of Torture and Enforced Disappearance Act B.E. 2565 (2022),² refugees in Thailand continue to suffer from widespread human rights abuses. The report also identifies the severe impacts of indefinite detention, including poor living conditions, ill-treatment, and lack of formal legal status that further exacerbates their vulnerability to exploitation, harassment, and abuse.

Our report highlights systemic issues in detention centres (IDCs), such as poor living conditions and ill-treatment, particularly affecting vulnerable groups like children, women, and the elderly and indefinite detention. It also emphasises the denial of basic rights, including access to healthcare and legal representation, as well as the heightened risk of exploitation and abuse due to the lack of formal legal status, transnational repression, and forced return.

In response to these concerns, CRSP urges the CAT to call on the Royal Thai Government (RTG) to take immediate steps to improve the protection and inclusion of refugees in Thailand, both within and outside immigration detention centres. CRSP advocates for legal reforms to safeguard the rights of refugees and highlights the importance of collaboration with civil society organisations (CSOs) to ensure that Thailand's policies align with international standards.

¹ Convention Against Torture and other Crule, Inhuman, or Degrading Treatment or Punishment (CAT), adopted December 10, 1984, acceded by Thailand October 2, 2007.

² Prevention and Suppression of Torture and Enforced Disappearance Act B.E.2565 (2022).

HUMAN RIGHTS VIOLATIONS AT THE IMMIGRATION DETENTION CENTRES

In 2020, Thailand had 22 immigration detention centres for people arrested for immigration offences and awaiting deportation. The Reception Centre for Mothers and Children (MC) in Bang Khen, Bangkok, is operated by the Immigration Bureau and is perceived as another form of detention since freedom of movement and access to services are limited. The Thai police reported that in 2021, more than 42,400 migrants (including refugees) had been detained for entering the country irregularly. As of November 2022,³ there are 233 refugees and migrants have been detained for more than one year. The majority of them are Rohingya and Uyghur ethnic minority.

Laws and policies related to immigration detention in Thailand include:

- 1. Immigration Act, BE 2522 (1979)
- 2. Immigration Order No.89/2562 (27 February 2019) regarding the Guidelines on the Admission, Detention, and Welfare of aliens
- 3. Immigration Order No.45/2567 (27 February 2024) regarding guidelines for considering bail for aliens awaiting deportation out of the Kingdom
- 4. Regulation of the Office of Prime Minister on the Screening of Aliens who Enter into the Kingdom and are Unable to Return to the Country of Origin B.E.2562 (2019) so-called National Screening Mechanism or NSM
- 5. Memorandum of Understanding on the Determination of Measures and Approaches Alternatives to Detention of Children in Immigration Detention Centres awaiting Deportation B.E. 2562 (2019) so-called MOU-ATD
- 6. Prevention and Suppression of Torture and Enforced Disappearance Act B.E. 2565 (2022)

CHALLENGES

Lack of Detention Accessibility

Access to IDCs is tightly regulated. Detainees are often unaware of their rights and procedures. Family members, legal representatives, and NGOs face challenges due to bureaucratic delays, limited visitation rights, and communication barriers. Family members without legal status are prohibited from visiting. Legal aid and medical services are often insufficient, with overcrowded conditions worsening accessibility. While some International Organisations, like UNHCR and IOM, can offer support, their access is limited and dependent on government approval.

³ https://idcoalition.org/publications/asia-pacific-briefing-paper-annex-country-profiles/

Detainees have limited communication options, such as mail, parcels, and restricted phone contracts with families. Some organisations provide meals, but there are restrictions. Bribery may be involved in accessing medicine or necessities, and there is a lack of communication between detainees and families across facilities.

A significant challenge is a lack of trust in the system. Complaint mechanisms are often ineffective, food and water are insufficient, and detainees face theft of cash and belongings. Informal fees are high, and there is fear of reprisal for both detainees and their families.

Poor Detention Conditions and Health Risks

Thailand's IDCs are overcrowded, and lack of privacy and extreme heat worsen detention conditions. These living conditions pose significant health risks to detainees. One major concern is the inadequate water supply, which has led to widespread skin rashes among detainees due to poor hygiene and sanitation. Additionally, smoking inside detention rooms has exacerbated respiratory and other health problems for non-smokers, further endangering detainees' well-being in already crowded and unsanitary conditions.

One of the CRSP Member Organisations reports that there is a severe shortage of healthcare in IDCs. The healthcare in detention is operated by the Public Disease Control Department, Ministry of Public Health, which often focuses on preventing disease outbreaks. A visiting doctor from the Public Disease Control Department only sees detainees once a week, and treatment is sometimes inadequate, consisting of a modest dosage of paracetamol for minor ailments. More critical medical conditions are still mainly neglected since detainees have difficulty receiving external healthcare services. The process of acquiring medical certificates for bail to receive external medical care is exceedingly complicated, leaving detainees with insufficient support for severe health conditions. For example, a detainee wants to apply for bail due to health concerns. This detainee must provide an actual medical certificate, including an official medical appointment, to apply for insurance. Copies cannot be used. It has an impact on the timing of treatment for serious illness. A medical check-up in detention requires a request from the authorities, which creates obstacles for refugees and asylum seekers who are unable to help themselves due to his or her illness and language barrier.

Despite the Ministry of Public Health being responsible for detainees' healthcare, the medical services remain critically insufficient. Mental health and well-being is often neglected in IDCs. Prolonged detention and the stressful conditions in IDCs contribute to a deterioration in mental health for many detainees. IOM plays a key role in providing mental health support, but a more formalised partnership between the government and CSOs is urgently needed to address these gaps.

The Order of the Immigration Bureau No.89/2562 (27 February 2019) regarding the Guidelines on the Admission, Detention, and Welfare of aliens has guaranteed the right to healthcare. For example, the Order of the Immigration Bureau states that IDCs must provide transportation with the officer to bring detainees to the nearest hospital.⁴ In practice, detainees must submit formal request forms before receiving treatment, and even then, the care provided is often minimal and inadequate for addressing serious health concerns. For detainees suffering from sexually transmitted diseases (STDs), stigma and inadequate medical care exacerbate their condition. The absence of infection control measures—such as detainees sharing razors—further endangers their health. Detainees with STDs require consistent medication to prevent worsening symptoms. Still, the lack of specialised medical professionals and limited access to proper care make it nearly impossible for them to receive treatment.

Some detainees have reported suffering from malnutrition during their time in detention, as the limited variety of food provided does not meet their nutritional needs, or in certain cases, halal food options are not available. For instance, detainees are frequently served papaya soup, and those with allergies to chicken have no alternative meal options. Lights in detention facilities are kept on throughout the night, disrupting the refugees' natural sleep cycles and contributing to mental and physical exhaustion.

Immigration Detention and Deportation Procedures

Thailand's immigration detention and deportation procedures lack explicit protections, especially for vulnerable migrants and refugees. Upon arrival, there is no vulnerability assessment. Although the Immigration Bureau set up the Reception Center for Mothers and Children (MC), children are sometimes placed in adult cells. Stateless individuals face barriers to fact-finding for their family roots in Thailand. Bail is available for UNHCR's refugees and asylum seekers. However, bail is a very high cost and requires a guarantor. Although there is Immigration Order No.45/2567 (27 February 2024) regarding guidelines for considering bail for aliens awaiting deportation out of the Kingdom. The rule is unclear and relies on the officer's discretion, leading to incompetent implementations such as re-detention. Furthermore, refugee families must report to immigration before deportation, with children sometimes placed in adult cells. The legal procedure for challenging deportation is unclear, especially for children.

The RTG heavily relies on bail to implement Alternatives to Detention (ATD). The current bail system operates independently from the bail provisions outlined in the Criminal Procedure Code.⁵ Immigration policies have the authority to designate detention

⁴ Order of the Immigration Bureau No.45/2567 (2024) regarding the Guidelines on the Admission, Detention, and Welfare of Aliens.

⁵ Immigration Act.B.E.2522 (1979) Sec. 54; Thailand Criminal Procedure Code B.E.2477 (1934), Sec. 106-119bis.

locations and set bail criteria under Section 54 of the 1979 Immigration Act.⁶ This has led to arbitrary and often excessive and disproportionate bail amounts, such as the standard 50,000 baht,⁷ which is inconsistent with the principles outlined in the Criminal Procedure Code of Thailand, which clearly defines bail limits based on the severity of the offence as specified in the regulations set by the President of the Supreme Court.⁸

The bail amount is particularly unfair compared to the often minor charges detainees face. This inequitable system imposes a significant financial burden on detainees, many of whom are asylum seekers or refugees with limited financial resources. There is also a troubling lack of clarity and consistency in bail durations. Even detainees from the same country with similar asylum claims often experience varying bail outcomes, leading to unequal treatment.

Detainees are only eligible for bail under specific conditions, such as refugee status or health concerns. Refugees in the IDC often need help securing Thai guarantors, as most do not have personal connections in Thailand. This has led to the use of a single guarantor for multiple detainees, which creates a monopoly system that opens up corruption and exploitation practices. Guarantors often exploit detainees by demanding personal gain or bargaining power with related individuals or NGOs. The relationship between guarantors and immigration officials is frequently rife with corrupt practices, particularly in cases involving the release of "close cases"—individuals denied refugee status by UNHCR. These UNHCR close cases required double the price of the bail surety.

VULNERABLE GROUPS IN DETENTION

Refugee and Asylum-Seeker Children

Refugee and asylum-seeker children in Thailand continue to be subjected to arrest and detention. In most cases, children will be transferred to the Reception Centre for Mothers and Children (MC). Living conditions at MC are substandard. There is a lack of access to formal education, inadequate nutrition, medical care, and unhealthy environment for child development. When the child falls ill, they are isolated from others without receiving appropriate medical attention.

⁶ Order of the Immigration Bureau No. 85/2565 (2022) regarding the Consideration of Bail for Aliens Awaiting Deportation under Section 54 of the Immigration Act B.E. 2522 (1979) and the Criteria for Bail dated April 28, B.E. 2559 (2016).

⁷ Order of the Immigration Bureau No. 88/2544 (2001) regarding Guidelines for Considering Bail for Aliens Awaiting Deportation. "Insurance by depositing cash or bank guarantee for aliens who are prohibited persons awaiting deportation demand an insurance fee of not less than 50,000 baht".

⁸ Recommendations of the President of the Supreme Court regarding the central standard list of security for temporary release of suspects or defendants, B.E. 2547, and regulations regarding temporary release security in criminal cases.

https://nanjc.coj.go.th/th/content/category/detail/id/22/iid/226554> accessed by 18 October 2024.

RTG has introduced a Memorandum of Understanding on the Determination of Measures and Approaches Alternatives to Detention of Children in Immigration Detention Centres awaiting Deportation B.E. 2562 (MOU-ATD) since 2019. The MOU-ATD provides a framework to protect children in immigration detention from the point of reception to repatriation. However, refugee and asylum-seeker children continue to be held for extended periods in the Reception Centre for Mothers and Children (MC) with their mother while separated from their father.

Refugee and asylum-seeker children can be bailed out under section 54 of the Immigration Act with their mother to the government shelter and community without legal status. For community placement, a bail surety of 50,000 THB and a guarantor are required for the child's mother. Fathers are usually not considered for release as primary caregivers, thus resulting in family separation as well as imposing pressure on mothers who find themselves as single heads of households, where the father remains detained. Female-headed households may not be the cultural norm of certain groups of migrants, which can present challenges for the mother, the child, and the father. Rohingya and Myanmar Muslim children were treated discriminately and were not allowed to be placed in the community. Only government shelters are permitted to receive them for alternative care.

Coordination between the Immigration Bureau and the Department of Children and Youth, as well as resource capacity, remains a challenge to effectively implement MOU-ATD, resulting in children being deprived of their liberty for a certain period. Refugee and asylum-seeker children are facing re-detention during repatriation and deportation processes when the families report to Immigration for deportation, and children are sometimes placed in adult cells for two weeks. Legal clarity is lacking, particularly in challenging challenging and procedures for minors.

Elderly Refugees and Asylum Seekers

Elderly detainees in IDCs in Thailand face severe challenges, including inadequate healthcare, lack of accessibility for mobility issues, overcrowded and uncomfortable conditions, poor nutrition, and isolation. IDCs in Thailand are not equipped to meet their physical and mental health needs, and elderly detainees often struggle to access legal assistance, leading to prolonged detention and increased psychological stress. Bail is not automatically granted for them based on their age.

According to one of the CRSP members, a 61-year-old female refugee had been detained in the IDC for six months. The process for bail was delayed reportedly due to national security concerns and data discrepancies, despite her being elderly and reporting that her health condition was worsening.

Refugees from Myanmar

Refugees from Myanmar, including Rohingya, are facing discriminatory treatment and can be held in detention for more extended periods compared to the other groups. They are resulting from the security policy that looks at Myanmar refugees as a threat to national security and international relations. This issue arises primarily due to the complicated process required for their release. Myanmar refugees must obtain a certificate from the Ministry of Foreign Affairs before being granted bail. The Ministry of Foreign Affairs certificate is challenging due to diplomatic and procedural obstacles that create prolonged detention.

For Rohingya refugees, CRSP recognised the discriminative approach under the security policy and perceived them as a group that is vulnerable to national security and international relations. They often faced indefinite detention in Thailand since ATD measures, including bail, are not permitted for adult Rohingya refugees. More than a hundred Rohingya children remain at the Reception Center for Mothers and Children (MC), and ATD is only granted for the government shelter.

The forced return along the Thai-Myanmar border is also currently ongoing. In April 2024, Thai soldiers organised for the transit of approximately 200 refugees via multiple truckloads to an area designated as a "Temporary Safety Area (TSA)"—makeshift locations controlled by the Royal Thai Army under the Standard Operation Procedure issued by the National Security and Peace Order to keep incoming Myanmar refugees. This TSA, "Nong Wua Dang Farm", accommodates 658 refugees and is about three miles from the second Thai-Myanmar Friendship Bridge along the Moei River, separating Thailand and Myanmar. After Myanmar refugees arrived at another TSA site known as "Tha Sai Rujira," four to five Thai troops escorted them in batches into the waist-deep water of the Moei River, forcing them to cross by foot back to Myanmar's Karen State, which is an active armed conflict zone.

Myanmar deportees are also at risk of conscription for military services by Myanmar Military Junta. According to Radio News Asia, Junta officials abducted 23 of 150 deportees and 48 of more than 120 others released from Ranong detention on July 30 and Aug. 7, respectively.¹⁰

These forced return practices violated the principle of non-refoulement, which is indicated under the Convention Against Torture and Section 13 of Thailand's Prevention and Suppression of Torture and Enforced Disappearance Act B.E. 2565 (2022).

⁹ https://www.fortifyrights.org/tha-inv-2024-05-17/

 $^{^{10}} https://www.rfa.org/english/news/myanmar/myanmar-thailand-deportation-forced-recruitment-10182024105223.html\\$

Uyghur Refugees

48 Uyghur refugees have been detained in IDC for a decade. These men, some first detained as children, are not allowed to contact anyone outside the IDC. This means they have no contact with their families and friends, no access to a lawyer and can see a doctor only when they get severely ill. This has contributed to the decline of their physical and mental health.

In the past ten years, five Uyghur refugees have died in Thai immigration detention centres (IDCs). Last year, two of them, both fathers in their 40s, died soon after being brought to hospital. Both men died without the chance to see their children before their deaths. In 2024, RTG provided medical checks for them after the death of Uyghur refugees in 2023. However, indefinite detention and the lack of prospect for resettlement for more than ten years has brutally deprived them of their lives, their families, their opportunities and their human dignity.

Furthermore, two Uyghur men were arrested in 2015 as suspects in the Erawan Shrine bombing in Bangkok under the National Council for Peace and Order (NCPO) order No. 3/2558. Bilal Mohammed and Yusufu Mieraili¹¹ were detained without warrants and were not informed of the charges in a language they understood. Initially, they were held at the Nakhon Chaisri Temporary Remand Facility, and they were later transferred to the Thung Song Hong Temporary Remand Facility in 2019, where they remain the only detainees. Their case is still pending at the Bangkok South Criminal Court, with approximately 170 prosecution witnesses yet to be called, including one who has reportedly died. Their prolonged detention for nearly nine years is deemed arbitrary and a violation of the Convention Against Torture (CAT) and the International Covenant on Civil and Political Rights (ICCPR), as well as principles regarding the separation of detainees.

During the pre-trial stage, Bilal Mohammed's lawyer filed a motion alleging that he suffered torture and ill-treatment while detained, including techniques such as waterboarding and threats to coerce a confession. The Ministry of Justice's Department of Corrections investigated these claims but did not conduct an examination that met international standards. In 2022, both detainees reported poor living conditions, including a lack of contact with relatives and inadequate dietary provisions that did not comply with their Muslim faith. By 2024, their health had significantly deteriorated, with both appearing in court in wheelchairs. Despite ongoing issues, the court ordered the facility to provide meals that align with their beliefs, and Thailand's Justice Minister visited them to check on their well-being.

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¹¹ https://www.benarnews.org/english/news/thai/testimony-begins-11222022133521.html

TRANSNATIONAL REPRESSION AND RISK OF FORCED RETURN

CHALLENGES

Thailand has long been a key destination for refugees and asylum seekers fleeing conflict and persecution, particularly from Myanmar. However, despite hosting tens of thousands of refugees along its border, notably in camps near Mae Sot, Thailand has yet to ratify the 1951 Refugee Convention and its 1967 Protocol.¹² This absence of a formal legal framework leaves refugees in a precarious situation, facing the constant threat of arrest, detention, deportation, and exploitation. On 22 September 2023, Thailand introduced the National Screening Mechanism (NSM)¹³ to provide a 'protected person' status for certain refugees. However, this mechanism is flawed, as it excludes individuals deemed to be national security threats, those holding migrant worker cards, commonly known as 'pink cards', and those already protected under other legal provisions. This exclusion effectively undermines the protective intent of the NSM, leaving a significant number of refugees, including political dissidents and human rights defenders, at continued risk of deportation or forced return.

The principle of non-refoulement, a cornerstone of international human rights law under both the Convention Against Torture (CAT)¹⁴ and the International Covenant on Civil and Political Rights (ICCPR) prohibits the return of individuals to a country where they face a real risk of torture, persecution, or other severe human rights violations. Thailand, as a state party to CAT, is obligated to uphold this principle. Yet, in practice, many refugees continue to face deportation, including those fleeing military repression in Myanmar, without adequate legal protections or due process. Reports from Myanmar refugees highlight that they are regularly subjected to police harassment, extortion, and arbitrary detention, with many forced to pay bribes to avoid being deported. According to the Prevention and Suppression of Torture and Enforced Disappearance Act B.E.2565 (2022) section 13, "No government organisations or public officials shall expel, deport, or extradite a person to another state where there are substantial grounds for believing that the person would be in danger of torture, cruel, inhuman, or degrading treatment, or enforced disappearance". This vulnerability is exacerbated by the fact that these refugees have no formal legal status, leaving them with limited access to basic services such as healthcare, education, and employment and perpetuating their marginalisation within Thai society.

¹² https://www.unhcr.org/media/states-parties-including-reservations-and-declarations-1951-refugee-convention.

¹³ Regulation of the Office of the Prime Minister on the Screening of Aliens who Enter the Kingdom and are Unable to Return to their Country of Origin B.E.2562 (2019).

¹⁴ CAT. Art.3.

Thailand's cooperation with neighbouring countries, including Myanmar, raises serious concerns about transnational repression. CRSP has documented cases of Myanmar dissidents being forcibly returned. For instance, in April 2023, three members of Myanmar's opposition, Saw Phyo Lay, Htet Nay Win, and Thiha, were arrested in Mae Sot, Thailand, and handed over to Myanmar's Border Guard Force (BGF), which is aligned with the junta. The men were reportedly targeted by BGF forces, and at least one of them was shot when attempting to escape after the handover. Their arrest and deportation violated the principle of non-refoulement, which prohibits returning individuals to a country where they face significant risk of irreparable harm, as well as instances of collaboration between Thai authorities and Myanmar's military junta. Such actions not only violate Thailand's international obligations under CAT but also exacerbate the climate of fear and insecurity for refugees. Without stronger legal protections and adherence to the principle of non-refoulement, refugees in Thailand remain vulnerable to continued human rights violations, including detention, forced returns, and threats to their physical safety.

NATIONAL SCREENING MECHANISM

The RTG's Regulation of the Office of the Prime Minister on the Screening and the Protection of Aliens who Enter into the Kingdom and are Unable to Return to the Country of Origin B.E.2562 (National Screening Mechanism: NSM) was promulgated on 24 December 2019. The NSM aims to identify people who need protection and support in Thailand because they cannot return to their country and need international protection. In September 2024, over 200 individuals submitted applications, seven were granted the Protected Persons Status, ¹⁶ one case has been denied the Protected Persons Status, and the rest of the applications are still in the screening process. It should be noted that most refugees who applied for NSM hold bail before entering the process. As a result, this initial group does not risk to arrest and detention. However, people who don't have bail are at risk of arrest and detention when entering the process.

CHALLENGES

While the NSM is not an asylum law, it has the potential to facilitate improved access to basic rights, notably freedom of movement, access to education, and healthcare for protected persons. Several priority challenges have been identified in the NSM system. First, access to procedures is centralised in Bangkok, with no reception or referral processes for individuals arriving at land borders. Those with irregular stays can apply to the NSM but are subject to immigration detention due to their lack of legal status. Bail, requiring a surety and guarantor, is the primary alternative to detention, with no other

¹⁵ https://www.hrw.org/news/2023/04/12/thailand-myanmar-activists-forcibly-returned

¹⁶ https://www.unhcr.org/media/general-debate-statements-thailand-2024-executive-committee-session

options developed for adult detainees. Furthermore, no clear legal status is defined for those receiving protected person status in the NSM.

Additional gaps include the lack of a Protection Framework for the NSM, which is critical for supporting cases of vulnerable groups to access rights and services. The NSM does not consider the right-to-work needed. In addition, inadequate human and material resources are allocated for NSM implementation, and organisations like UN agencies and CSOs have been approached to provide support with interpreters, capacity building, and technical resources.

RECOMMENDATIONS TO THE ROYAL THAI GOVERNMENT

- 1. Reduce and End the Use of Immigration Detention and ensure equal access to Alternatives to Detention measures for all refugees and asylum-seekers by eliminating requirements, conditions, and discriminatory manners that could delay the release of refugees and asylum-seekers from detention facilities.
- 2. **Issue Legal Status:** secure a clear legal status for all refugees and asylum-seekers to prevent arbitrary arrest and detention while facilitating access to healthcare, education, and self-reliance.
- 3. **Uphold the Principle of Non-refoulement:** End the forced return to all refugees and asylum-seekers, guarantee the principle of non-refoulement, and ensure that all refugees and asylum-seekers will be truly protected from forced return under the national policy and practices.
- 4. Improve Detention Conditions and Oversight: Collaborate with international and civil society organisations to monitor and improve detention conditions, ensuring that Immigration Detention Centers (IDCs) comply with international human rights standards. Expedite refugee processing for individuals facing prolonged detention, including Uyghurs and Rohingya refugees.
- 5. Provide Clean Water, Adequate Healthcare, and Communication Resources: Ensure access to clean drinking water for all detainees without charge and allow detainees regular medical services, and set up an emergency support system, private communication with their relatives, legal representatives, and relevant agencies. Legal visits should occur privately unless there are legitimate safety or security concerns.
- 6. **Establish a Confidential Complaint Mechanism:** Create a secure, confidential internal complaint system that allows detainees to report grievances, mistreatment, or abuse without fear of retaliation. Ensure that complaints are handled efficiently and transparently.
- 7. Strengthen Inter-Ministerial Coordination and Local Protection Solutions: Enhance collaboration between relevant ministries and civil society organisations to integrate vulnerable groups into state services, such as healthcare and education, while developing local solutions under the NSM and MOU-ATD. Avoid overreliance on third-country resettlement or repatriation by promoting burden-sharing within Thailand through permits that allow refugees and asylum-seekers to be part of the national development.