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MIRDEC 2025

MIRDEC 24th  
International Academic Conference  
Economics, Business and Contemporary Discussions in Social Science

## CONFERENCE PROCEEDINGS Istanbul 2025, Türkiye

Full Paper Series

Editors

John Marangos  
Irina Ana Drobot  
Jesus Gomez Velazquez

24-25 April 2025  
Nippon Hotel  
Istanbul, Türkiye

MIRDEC 24th -Istanbul 2025  
International Academic Conference on  
Economics, Business and Contemporary Discussions in Social Science  
24-25 April 2025, Istanbul, Türkiye  
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Thanks to all our participants for their academic and social contributions.

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Istanbul, Türkiye

**ANNA SKORSKA<sup>1</sup>**

## **HOW TO REACH WORK LIFE BALANCE? CHALLENGES AND OPPORTUNITIES**

### **Abstract**

This article presents the essence and importance of work-life balance, focusing on potential sources of conflict in different areas of human functioning. It analysis the relationship between working hours and the ability to maintain harmony across professional and personal domains Its aim was to assess satisfaction with selected aspects of life related to professional and non-professional responsibilities of Poles. The objective was realized through a diagnostic survey conducted in October 2024 among 1,067 working adults in Poland. The findings reveal that nearly half of respondents work 40 hours weekly, aligning with standard norms, but a substantial proportion report working over 50 hours, leading to increased risk of burnout, health problems, and strained family relations. Based on the results obtained, conclusions and recommendations addressed to employers were formulated.

**Keywords:** Work-life balance, working hours, family duties

**JEL Codes:** J21, J11, J81, I31

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### **Introduction**

Work and personal/family life are undoubtedly the two most important areas of human functioning. Eliminating or significantly reducing sources of conflict between different life spheres leads to balance, which is valued by individuals, managers, and entrepreneurs alike. In terms of time, balance is maintained when a person feels they spend an adequate amount of time both at work and with family or on other obligations. Time conflict arises when the time required by family competes with work time and vice versa (Skórska, 2021a). Key to maintaining balance is defining working hours and their flexibility according to employee needs, which enables the fulfillment of family duties, as stated in the ILO Convention concerning workers with family responsibilities (ILO, 1981). Observing equal employment treatment rules, especially for part-time workers, predominantly women, is also essential. Considering the above, the aim of this article is to assess satisfaction with selected aspects of life linked to professional and non-professional duties that influence life balance among Poles. This objective required an analysis of results from a 2024 study on a representative sample of 1,067 working individuals, allowing for the presentation of key conclusions and recommendations.

### **Literature Review**

The concept of work-life balance (WLB) originates from time management theory and pertains to the pursuit of harmony between professional and personal life. It gained popularity in the late 1970s and early 1980s in response to increasing social challenges such as workaholism, work-related illnesses, chronic stress, and professional burnout. These problems reduced work motivation, engagement, and efficiency. Over the decades, the concept has evolved, reflecting changes in socio-economic conditions and individual needs (Brough et al., 2020).

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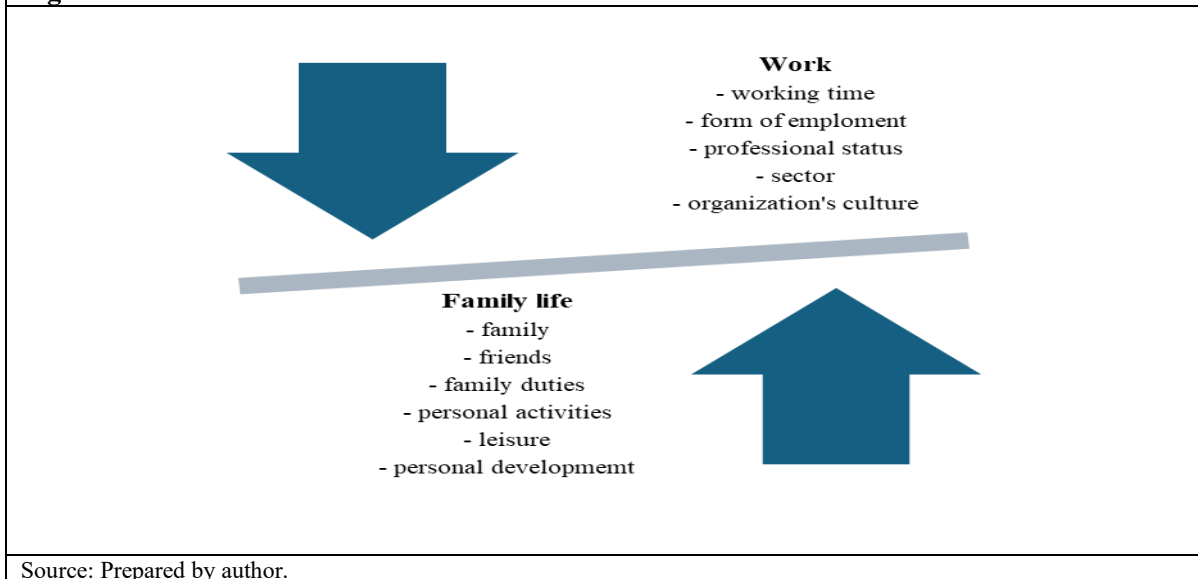
Awareness of the importance of shaping proper relationships between life domains, recognizing conflict causes, and solving issues related to multiple life roles is reflected in numerous terms and concepts: work-life conflict, life-work balance, integration of professional and family life, enrichment, and work-life facilitation (Carlson et al., 2009; Ferguson et al., 2012; Hammer et al., 2011; Maertz & Boyar, 2011; Carmeli, 2003).

Focusing on the link between working time and life balance, it's crucial to remember that individuals operate within a limited time budget shared between work, caregiving, rest, and leisure. Balancing these demands poses a challenge for everyone playing multiple roles—as an employee, parent, child, or partner. These role demands often clash, leading to conflict (Greenhaus & Beutell, 1985), due to finite resources like time and energy. In this context, work may disrupt personal life or, conversely, excessive family duties may negatively impact professional responsibilities (Skórska, 2023).

Work-life conflict can result from long working hours and their consequences (Grzywacz & Marks, 2000; Sturges & Guest, 2004; Voydanoff, 2004). Despite assumptions that longer hours lead to career success, they often result in neglect of family duties, lower productivity, and employee fatigue (Dembe et al., 2005; Johnson & Lipscomb, 2006). Unpredictable schedules, instability, and atypical hours (e.g., nights, weekends) also disrupt family life. When analyzing the causes of conflict between professional and personal life, it is worth emphasizing that many forms of flexible employment and the associated unpredictability of working hours, lack of stability, security, and living in constant stress and uncertainty, may also negatively impact family life. In this context, particular attention should be paid to work during atypical hours—such as evenings, nights, or weekends. The negative consequences of this conflict include increased tension, prolonged stress, job dissatisfaction, reduced efficiency, and burnout.

Conversely, family-work conflict may arise from excessive domestic responsibilities, unequal task division, and caregiving burdens. These pressures reduce productivity, raise absenteeism, and cause job dissatisfaction, frustration, and even depression (Kinnunen et al., 2006; Frone & Yardley, 1996; Aryee et al., 2005). Evolving family models and shared parenting roles mean these issues affect everyone, though unevenly by gender. Legal and institutional support (e.g., EU WLB Directive, parental leave, childcare access) helps mitigate these conflicts.

**Figure 1: Work-Life Conflicts**



Summing up, treating work and private life as separate leads to the feeling of working too much or living too little. Achieving balance requires viewing these spheres as complementary and equally important (Skórska, 2021), especially today, when boundaries between them are increasingly blurred.

### Methodology and Data Analysis

The study was conducted using a diagnostic survey in October 2024 on a representative sample of 1,067 Polish working adults, using CAPI (Computer Assisted Personal Interview). The sample's sociodemographic profile is presented in Table 1.

<b>Table 1. Sociodemographic Characteristics</b>			
Sociodemographic Characteristics		number	%
		respondents	
Gender	Woman	492	46.11
	Men	575	53.89
Age	18 – 24	61	5.72
	25-34	232	21.74
	35-44	312	29.24
	45-54	276	25.87
	55 and above	186	17.43
Education level	Primary or less	11	1.03
	Vocational	75	18.47
	Secondary	406	38.05
	Tertiary	575	53.89
Marital Status	Married	615	57.64
	Single	330	30.93
	Divorced	78	7.31
	Widowed	31	2.91
	Separated	13	1.22

Source: Author's own calculations based on research results.

The group of respondents was diverse. Among women, who accounted for over 46% of respondents, the highest proportion—nearly 50%—had attained higher education (compared to 46.4% of men), while 41% of women and 44.7% of men declared having completed secondary education. Individuals with vocational education represented just over 18% of both men and women, and only 1% held primary or lower education. The largest age group, regardless of gender, was 35–44 years (almost 30%), followed by those aged 45–54 (about 26%). The youngest respondents (aged 18–24) made up less than 6%, and the oldest group (55 and above) accounted for over 17%. More than half of the respondents (57.6%) were married, and nearly 31% were single.

In terms of employment form, the majority of respondents—around 89%, regardless of gender—were employed under a standard employment contract. Among them, a significantly higher percentage (82%) worked full-time compared to those employed part-time (7%). Approximately 3.5% worked under civil law contracts (contract of mandate or specific-task contract), and 6.5% were self-employed. These details are presented in Table 2.

**Table 2. Employment Form of Respondents**

Employment form	number	%
	respondents	
Full-time	872	81.72
Part-time	74	6.94
Self-employed	69	6.47
Civil contracts (contract of mandate or specific-task contract)	38	3.56
Farming	12	1.12
Other	2	0.19

Source: Author's own calculations based on research results.

### Working Time and Work Life Balance – Data Analysis

Working time is one of the fundamental labor law aspects, historically regulated by ILO Convention No. 1 (1919), which set daily working time at 8 hours and weekly at 48 hours. Today, working time regulations exist at international, national, sectoral, company, and individual levels (Lee et al., 2007; Eurofound, 2010; Męcina & Niedziela, 2020).

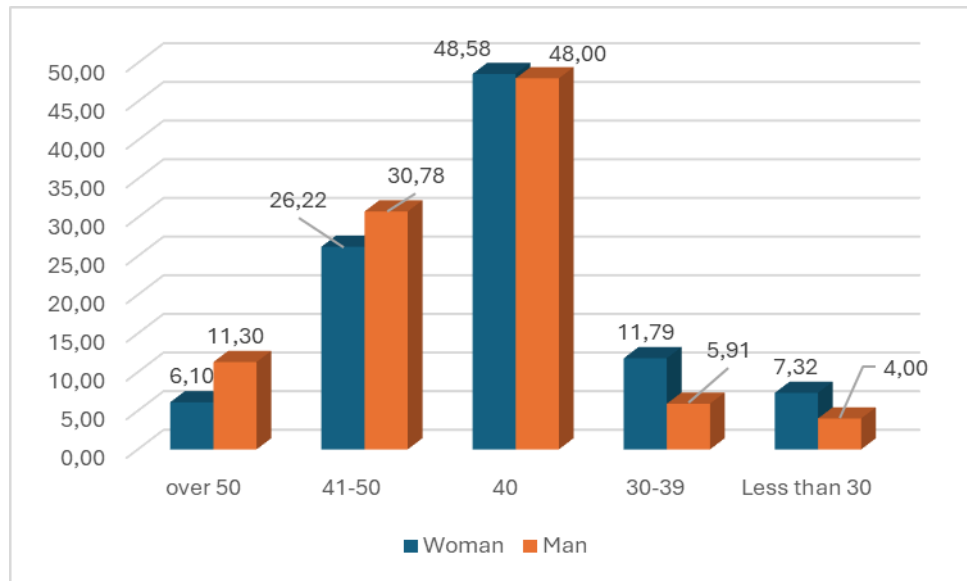
When analyzing the development of working time and its diversification, it is worth paying attention to the discrepancies between the legal regulations on standard working time and the actual number of hours worked. All the more so because this is one of the key factors determining the possibilities of combining professional work with other areas of life. Dutch and Danish workers had the shortest averages (30.6 and 33.6 hours), while Greeks worked the most (nearly 42 hours). In several EU countries, including Poland, the average working time exceeds 40 hours a week. Taking into account only full-time workers, the average working time in the EU reaches 41 hours, (44 in Greece and 38.4 in Denmark). In 2023, men worked about 40 hours weekly, while women worked 6 hours less on average. In countries with a long tradition of supporting work-life balance, such as Denmark or Germany, women worked an average of 31 hours per week, and in the Netherlands 25.7 hours.

When analysing working time and its impact on life balance, attention should be paid to the percentage of employees whose average working hours are significantly longer than average and those who work part-time. There is no doubt that working more than 50 hours a week makes it difficult, and in many cases impossible, to perform household or family duties, as well as to enjoy limited leisure time (Anxo, Karlsson, 2019).

In the conducted study, 48% of respondents, regardless of gender, indicated that they work an average of 40 hours per week, which aligns with the normative working time (Figure 2). Of concern is the small percentage of individuals working less than 30 hours per week—only 5.5%. Although the percentage of women in this group is slightly higher than that of men, potentially offering them greater opportunities to balance life, it is still significantly lower compared to women in Denmark or the Netherlands. On the other hand, a relatively high proportion of respondents, both women and men, working more than 40—and particularly more than 50—hours per week, points to a risk of conflict between professional and personal life. When such a situation persists over time, many employees become overworked, which may result in problems with concentration, health deterioration, and family conflicts. The number of employees experiencing burnout is increasing, while their efficiency, creativity, and engagement

decline, and absenteeism rises—posing an additional challenge for employers. Free time is a very important issue for employees; however, employers should not overlook that from a business perspective, it plays an equally crucial role (Skórska, 2022; Waworuntu, Kainde, Mandagi, 2022, Wijngaards, Kin, Burger, 2022).

**Figure 2. Average Working Time of the Respondents**

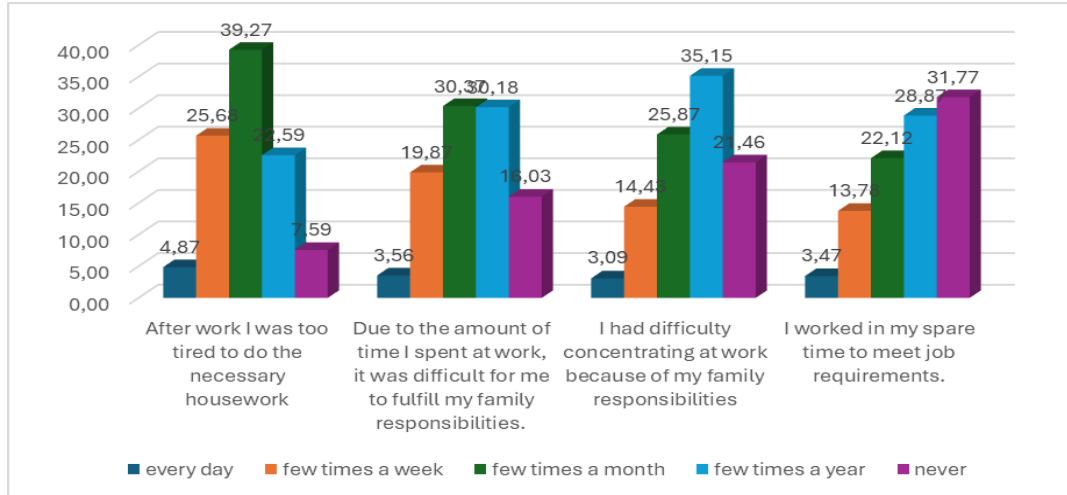


Source: Author's own calculations based on research results.

A key element in addressing the issue of work-life balance was a question concerning respondents' perceptions of the nature of work-life conflict and the frequency with which they experienced its effects. Analysis of the first cause of conflict—time spent at work—showed that for nearly 23% of respondents, it posed a barrier to fulfilling family responsibilities on a daily basis or several times a week, and for over 30% of respondents, this occurred several times a month. For nearly 16% of respondents, work never interfered with family life, as illustrated in Figure 3.

Conversely, an excess of domestic duties and a focus on family life negatively impacted professional work daily or several times a week for 17% of respondents, with women reporting this effect more frequently than men. These challenges were never experienced by almost 21% of respondents. Notably, over 40% of women indicated that they were too tired on a daily basis or several times a week to fulfill household responsibilities, while the percentage was slightly lower among men. On the other hand, nearly 8% of respondents stated that they were never too tired to perform household tasks.

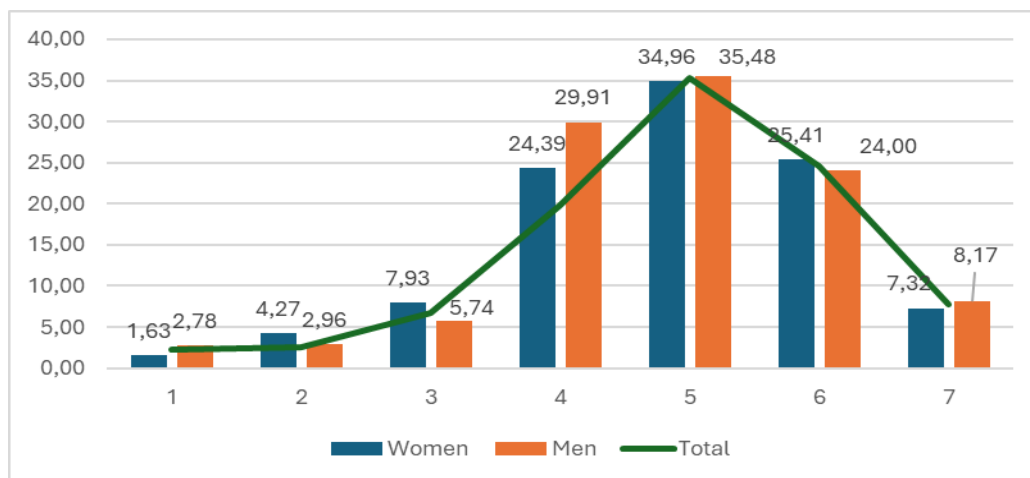
**Figure 3. Work-Life Conflict and Its Frequency**



Source: Author's own calculations based on research results.

The risk of conflicts in various areas of life, and, conversely, the skillful counteracting of them - influences the subjective assessment of WLB. The distribution of respondents' answers corresponds to their average working time, involvement in household and family duties and opportunities for development and rest. As the result, the highest percentage of respondents assessed their WLB at the level of 5 - 35%, regardless of gender. Women assessed their WLB slightly lower - 24% compared to men - 30%. The lowest scores (1-2) were given to 6% of women and 5.6% of men, as shown in Figure 4.

**Figure 4. Work Life Balance Assesment**



Source: Author's own calculations based on research results.



## Conclusions and Recommendations

The conducted study confirms the importance of maintaining a work-life balance for employees as well as the disruptive impact of long working hours. The consequences of a life balance disruption are experienced both by individuals and organizations. Striving for balance is crucial for both the physical and mental health of individuals, as disruptions in this balance can lead to various psychosomatic symptoms, anxiety disorders, or even depression. Living under constant stress and pressure may result in frustration and discomfort, which can become a cause of professional burnout. Furthermore, problems in private life that stem from professional obligations can lead to lower life satisfaction, emotional difficulties, or even addictions. In the long run, an inability to cope with one's responsibilities also affects organizational functioning. Employee absenteeism increases, leading to a loss of investment in human capital, decreased creativity and engagement at work, deteriorating relationships with clients and colleagues, and a drop in productivity.

In order to effectively support work-life balance, organizations should consider the possibility of making working time and its organization more flexible. Remote work, hybrid work, and shortened working hours are a response to the needs and expectations of employees and the organization's environment. However, it is worth remembering that in addition to excessively long working hours, the unpredictability of working hours, work at atypical times (e.g. weekends, night work), lack of a sense of stability, security, uncertainty, associated with flexible forms of employment are increasingly mentioned among the causes of work-family conflict. In addition, being permanently online additionally affects the blurring of the boundaries between different spheres of life. On the one hand, answering phone calls and emails outside of “standard” working hours is becoming a kind of “norm,” while on the other hand, browsing websites or social media during work can have a negative impact on the performance of professional duties and family relationships.

Employers should systematically analyze employee needs, which will allow for adjusting activities to their expectations. Companies can organize regular workshops, trainings and meetings devoted to stress management, dealing with burnout or building healthy work habits. Managers and organizational culture play a crucial role—whether it encourages overtime, respects personal time, or promotes flexibility and well-being—directly impacts employees’ capacity to reconcile professional and private responsibilities. On the other hand neglecting WLB may signal that the organization does not value employee wellbeing, resulting in higher turnover and lower engagement.

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URSZULA GRZEGA<sup>1</sup>

## THE USE OF CONSUMPTION MEASURES IN STUDIES OF THE STANDARD OF LIVING

### Abstract

The theoretical objective of this study is to present basic consumption indicators used in research on the standard of living. Additionally, the study aims to demonstrate the practical application of the food index in assessing the standard of living in the European Union between 2010 and 2022. The research is based on secondary sources of information (Eurostat).

The use of consumption indicators in studies on the standard of living allows for an analysis of the pace and direction of income distribution across different categories of needs. As a derivative of income, expenditures—along with their level, structure, and changes over time offer a relatively accurate reflection of how well specific needs are met, thereby providing a more comprehensive picture of living standards. One of the oldest consumption measures used to assess the standard of living of households is the food index. A thorough analysis of this index enables comparisons across time and geographical regions. The analysis of the food index, based on Eurostat data, revealed significant spatial disparities in living standards within the European Union. In 2022, Ireland, Luxembourg, and Austria ranked as the countries with the highest standard of living according to the food index, whereas Romania, Bulgaria, and the Baltic states recorded the lowest standard of living.

**Keywords:** Consumption expenditure, consumption indicator, standard of living

**JEL Codes:** E21, O10, O57

Grzega, U. (2025). The Use of Consumption Measures in Studies of the Standard of Living. In Conference Proceedings: Full Paper Series of MIRDEC 24th – Istanbul 2025 International Academic Conference on Economics, Business and Contemporary Discussions in Social Science, pp. (12-20). 24-25 April 2025. Istanbul, Türkiye. <https://www.mirdec.com/istanbul2025proceedings>.

### 1. Introduction

The methodology of measurement of standard of living includes the collection of instruments used to measure the level of needs satisfaction of population in total, of socio-economic groups or of particular households. As a result of those measurements, the specific numbers are obtained, which can take on the form of measures or indicators of standard of living. Those numbers express the changes in the level of subjects' needs satisfaction as regards the standard of living. It's done in various cross sections, including temporal and spatial cross sections. They enable the evaluation of, among others, the effectiveness of conducted socio-economic policy of the country and the ability of subjects to adjust to new conditions on the market (Grzega, 2012, p. 61).

The research on the standard of living is interdisciplinary in nature, integrating the expertise of economists, sociologists, statisticians, psychologists, political scientists, and professionals from various fields. The diversity and richness of methodological approaches make it impossible to comprehensively present all proposed frameworks, methodological solutions, and specific measures and indicators used in assessing living standards. This study focuses on consumption-based measures, which primarily reflect the material aspects of households' lives. The consumer approach to research on the standard of

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living of the population is one of several adopted and applied approaches in researching this phenomenon.

The theoretical objective of this study is to present basic consumption indicators used in research on the standard of living. Additionally, the study aims to demonstrate the practical application of the food index in assessing the standard of living in the European Union between 2010 and 2022. The research is based on secondary sources of information (Eurostat).

## 2. Measurement of the Standard of Living of the Population - Selected Elements

In the last half a century, there was a significant increase of interest in research on standard of living, living conditions and quality of life. Among causes of interest increase in the research concerning the conditions, standard and the quality of living we may find so called “new” targets of societies development, as well as globalization and internationalization processes, benchmarking popularity, new models of management, tendency to fact based policy and climate changes (Berger-Schmitt, Jankowitsch, 1999, pp.9-11).

The standard of living is associated with the extent to which human needs are satisfied, which results from the consumption of material goods and services and the use of benefits from the social and natural environment (Bywalec, 2017, p.49). Starting from this definition, it has to be taken into consideration that research on standard of living of population is in fact the analysis of human needs satisfaction. The needs are the core of the notion of “standard of living”. The groups of needs discussed here are especially: food, housing, health care, education, culture and recreation, financial security and social security (Luszniewicz, 1982 p. 12). The degree of experiencing and satisfaction out of above mentioned and other needs influences the diversity of standard of living in particular consumption entities.

The basic entities of research on standard of living are as follows:

- the population of country in total or other territorial communities,
- the households
- the individual consumer may also be the entity of research (Janoś-Kresło, Mróz, 2006, pp.108).

Depending on the research subject we can relate to research on the standard of living conducted in macro- and microeconomic scales (Grzega, 2015).

The measures of standard of living of population (residents of households) are presented as numerical assessment of the degree of basic needs satisfaction. The measures perform direct function informing clearly what they relate to. In the research on the standard of living, various types of indicators are used. As opposed to measures, they perform an indirect function, they connect the researched problem with a wider background. They enable the estimation of population's living conditions and the monitoring of trends in various areas of social life (McEwin, 1995). Many authors use those notions interchangeably as well as the author of the present study.

In general, three main aspects of research on standard of living can be distinguished. They are employed into the research on the socio-economic development of societies (Sirgy, Michalos, Ferriss, Easterlin, Patrick, Pavot, 2006; Johansson, 2002):

- economic,
- social,
- subjective.

In the first approach, the relationship between benefits and expenditures is most commonly analyzed (Dasgupta, 2001). Income and expenditures play a crucial role in this context, as they allow the studied phenomenon to be quantified. By converting various consumption goods and services into a common monetary unit, this method facilitates measurement. One key advantage of this approach is the relatively easy access to data, which can be sourced from numerous yet limited providers, simplifying the analytical process (Chan Yin Fah, 2010; Meyer & Sullivan, 2003). However, it is important to note that income is not an end in itself but rather a means to achieve a desired standard of living (Grasso & Canova, 2008). Despite its usefulness, this approach overlooks several important aspects of living standards, such as environmental conditions, healthcare, education, safety, and civil liberties.

The second approach, known as the social approach, is an objective measurement method that focuses on aspects of individuals' lives that can't be analyzed using economic indicators. These indicators are widely utilized in research and assessments of living standards, providing insights into social development and its changes over time (OECD, 2009, p.52). They reflect residents' living conditions and help identify various social issues (Noll, 2004, pp.185-212). For these indicators to be effective, they must be sensitive to specific phenomena, available over time, easy to interpret, and clearly understandable. Additionally, they should be linked to both economic and subjective indicators (McEwin, 1995). In the broadest sense, social indicators serve as tools for ongoing observation and analysis of social changes. Beyond supporting socio-economic policymaking, they also play a role in monitoring the effectiveness of political programs (Michalos, 2003, pp.239-274).

The third approach to studying living standards is based on subjective indicators, which focus on individual consumer experiences and overall life satisfaction. These experiences are expressed through personal opinions, providing valuable insights into different aspects of living standards and quality of life (Veenhoven, 1996). Subjective indicators hold the same level of relevance as economic and social indicators (Noll, 2004, pp.151-181). However, they have certain limitations, as they are highly dependent on respondents' personal characteristics, aspirations, and individual perceptions of specific issues.

Theoretical studies, research experience and economic and social practice indicate that analyses and assessments of people's standard of living (especially international comparisons) can be conducted in three dimensions. These are (Bywalec, 2022):

- the economic dimension of the standard of living, which is expressed by the amount of tangible assets of households,
- the financial dimension of the standard of living, which is expressed by the amount of current income flowing to households in a given time,
- the consumer dimension of the standard of living, which can be expressed in value - in monetary units or in a natural way, i.e. in physical units.

The standard of living of a population can be assessed using a variety of measures, which, in broad terms, can be categorized as either objective or subjective. Among the objective measures, a distinction can be made between value-based indicators (expressed in monetary terms) and quantity-based indicators (expressed in natural units). Value-based measures reflect the expenditures incurred by both individuals (e.g., income spent) and the government (e.g., public spending on collective consumption) to achieve a certain standard of living. In contrast, quantity-based measures assess the outcomes or benefits in terms of the actual fulfillment of lower- and higher-order needs. While value-based measures help determine the cost of attaining a specific standard of living, quantity-based measures evaluate the extent to which various needs are met. These two types of indicators are not mutually exclusive; rather, they should be used in a complementary manner to provide a more comprehensive assessment (Grzega, 2012, p.81, Grzega, 2018).

### 3. The Consumption Measures in the Assessing on Standard of Living

Research utilizing consumption indicators can be conducted using various data sources. These include macroeconomic data from national accounts, household budget surveys, and direct survey-based research. One of the fundamental consumption indicators used to assess a country's standard of living is the global consumption indicator. This value-based measure expresses the consumption of both food-related and non-food-related goods and services in a single currency, such as the Euro. The interpretation of this indicator depends on the chosen price system and the scope of consumption considered. It may encompass the value of goods and services financed by household disposable income and/or those funded by public sources, such as education, healthcare, and cultural services.

A main limitation of this indicator is the difficulty in accurately estimating the value of services provided free of charge or at a subsidized cost. Additionally, it does not account for deferred income, such as savings, household stock levels, or durable consumer goods. This measure represents only average values and does not provide insights into the composition of consumed goods and services. Other drawbacks include its limited sensitivity to sudden socio-economic shifts and the delayed reflection of changes over time. Despite these limitations, the global consumption indicator has notable advantages. It offers a comprehensive perspective by incorporating multiple influencing factors, simplifies calculations, and enables international comparisons. Given its broad applicability, this indicator allows for the classification of countries based on specific criteria, such as different stages of consumption development.

In analyzing and assessing the degree of needs satisfaction, indicators related to the level, dynamics, and structure of individual consumption—both in nominal and real terms, at macro and micro scales—are most commonly used. For example, the volume, rate of change, and structure of household consumption serve as key indicators for an objective evaluation of a population's standard of living, at least from a material perspective.

In Eurostat methodology, there is used an actual individual consumption indicator. It covers all of the goods and services consumed by the population, irrespective of the financing source (private or public). The part paid from the available income, realized in the framework of individual consumption is defined, in Eurostat research, as household final consumption expenditures. This category includes all of the expenditures made by the household sector. The remaining part consists of expenditures of government and non-government organizations, among others, the expenditures for health care and education (Eurostat, 2025). The use of individual consumption indicators helps identify trends and patterns in the distribution of household income across different categories of needs. Since expenditures are a direct outcome of income, their level, structure, and evolution over time provide a relatively accurate picture of how well consumption needs are met. A detailed analysis of these indicators allows for meaningful comparisons across both time and geographical regions.

One of the oldest consumption indicators used to assess the standard of living is the food index, also known as Engel's coefficient. This measure plays a crucial role in evaluating living conditions across populations and households by indicating the proportion of total expenditures allocated to food. Over 150 years ago, Engel observed that poorer societies tend to spend a larger share of their income on food. According to Engel's law, as income rises, the percentage of income spent on food decreases. An increase in the food index typically signals a decline in the ability to meet basic needs, suggesting a worsening standard of living (Bywalec, 2010, p. 117). Conversely, a lower food index indicates that only a small portion of income is spent on food, which is generally associated with greater societal wealth. Therefore, analyzing changes in this measure over time is valuable—if the share of food expenditures within total expenditures declines, it reflects an improvement in the standard of living (Grzega, 2012, p. 170).

Another important measure for assessing the standard of living is the expenditures free choice indicator, which represents the share of discretionary expenditures within total expenditures. Discretionary expenditures refer to spending beyond basic household needs—these expenses are not essential for daily functioning, and forgoing them does not directly impact health, survival, or social participation. However, a high and increasing value of this indicator generally reflects an improving standard of living. It is important to note that the classification of expenditures as basic or discretionary is often subjective and can vary depending on different expenditure subcategories. The key criterion for distinguishing between these two types of spending is whether a given expenditure is considered conventionally indispensable within a specific socio-economic context. However, this classification presents two main challenges: first, it is highly subjective, making comparisons between different population groups difficult; second, it is challenging to apply using publicly available data sources (Grzega, 2018).

To assess the degree of needs satisfaction, quantitative consumption indicators are commonly used. These indicators are expressed in natural units, such as pieces or kilograms, allowing for an objective estimation of need fulfillment based on recommendations from physiologists and other experts. They help evaluate the adequacy of consumption in key areas like food and housing. Positive and standardized quantitative and qualitative changes in natural consumption indicate an improvement in the standard of living.

Summarizing this part, it can be stated that consumption is an adequate indicator of actual standard of living. The structure of consumption expenditures is the result of the extent of available income of households and the wealth of the country measured with the level of GDP per resident (Szulce, Walkowiak-Markiewicz, 2017).

#### **4. The Food Index in EU in the Years 2010-2022**

The food index presented in the following part expresses the percentage share of expenditures for food and non-alcoholic beverages in total expenditures in the whole household sector. It is calculated from the available income, in actual prices.

The significant information enabling the evaluation of standard of living on the basis of food index is information about the income conditions in households (according to 1st Engel's law- the higher the level of income, the lower the share of food expenditures in total expenditures). It results from Eurostat data, that between 2010-2022 in the whole EU there was an increase of gross available income in household sector (Eurostat, 2025). Certainly, the situation was diverse, depending on the year of analysis and on the country, but this is not the aim of the present detailed reflections.

Analyzing the data from Table 1, it is visible that the share of food expenditures in total EU expenditures equaled 13% in 2010 and 13.6% in 2022. However, there are some countries which exceed this level and conversely. It is easy to notice that countries on the south and east of Europe exceed, for the EU-27, the mean share of food expenditures and non-alcoholic beverages. The highest share of food expenditures in 2022 is noted in Romania (25%) and Bulgaria (20.8%). The lowest share of food expenditures in 2022 is noted in Ireland (8.6%) and Luxembourg (9.3%). In Poland, in the years 2010-2018 there is a constant decrease of share of food expenditures (a decrease from 2.8 percentage points). However, in the covid year there was an increase to the level of 19.1%, after which food expenditure fell again, finally reaching the level of 18.5% in 2022. Generally, a food-index in Poland is still significantly higher than the mean EU values (in 2022 the difference equaled almost 4.9 percentage points). The high value of food index can be found as well in Romania, Bulgaria, Latvia, Lithuania, Estonia, Slovakia, Croatia, Portugal, Hungary and Greece. Among the countries, which accessed the Union after 1st May 2004, only in two cases the share of food expenditures in total expenditures is close to the mean EU level and it is Cyprus and Malta's level (13 and 13.3%). Whereas in the member states



of so called “old Union”, the countries in which the share of food expenditures exceeds the mean values for the EU are as follows: Portugal, Greece and Italy. In general, much higher values of the food index, in comparison to EU mean, for “new” Union members indicate a lower standard of living of the residents of those countries.

**Table 1. Food Index in Households Sector in EU**

GEO/YEAR	2010	2012	2014	2016	2018	2020	2022	2022/ 2010 pp.
EU-27	13.0	13.1	13.2	13.1	13.1	14.8	13.6	0.6
Austria	9.9	9.9	10.0	9.8	9.7	11.4	10.0	0.1
Belgium	12.8	12.6	12.8	13.0	12.7	14.2	12.2	-0.6
Bulgaria	19.6	18.5	19.2	19.6	19.1	20.7	20.8	1.2
Croatia	18.4	18.7	19.0	18.7	18.3	20.8	18.1	-0.3
Cyprus	11.3	11.7	12.4	12.2	11.5	1.4	13.0	1.7
Czechia	14.0	15.2	16.1	15.8	15.3	17.1	15.8	1.8
Denmark	11.3	11.5	11.5	11.5	11.4	12.2	11.8	0.5
Estonia	19.8	19.6	20.9	20.2	19.6	21.2	19.1	-0.7
Finland	12.1	12.3	12.5	11.9	11.6	12.7	12.2	0.1
France	13.0	13.4	13.4	13.4	13.1	14.9	13.3	0.3
Germany	10.3	10.0	10.5	10.6	10.7	11.9	11.5	1.2
Greece	15.3	16.3	15.8	15.5	15.5	19.1	16.2	0.9
Hungary	16.5	17.3	17.9	17.4	17.5	18.8	16.7	0.2
Ireland	9.8	10.5	9.7	9.3	9.1	10.4	8.6	-1.2
Italy	14.4	14.2	14.3	14.3	14.2	16.5	14.4	0.0
Latvia	20.3	20.1	19.6	17.9	18.0	19.9	19.7	-0.6
Lithuania	23.9	24.0	23.0	22.2	20.7	21.8	19.2	4.7
Luxembourg	8.7	8.4	8.4	9.1	8.8	10.2	9.3	0.6
Malta	15.2	14.8	14.8	13.9	12.7	15.3	13.3	-1.9
Netherlands	10.9	11.4	11.4	11.5	11.3	13.2	11.7	0.8
Poland	20.2	19.2	17.8	17.8	17.4	19.1	18.5	-1.7
Portugal	15.9	17.4	17.3	16.9	6.3	18.7	17.3	1.4
Romania	27.2	29.8	27.1	25.7	25.9	25.0	25.0	-2.2
Slovakia	15.2	15.9	15.1	15.2	16.6	19.8	18.3	3.1
Slovenia	14.3	15.2	15.0	14.7	14.0	15.9	14.0	-0.3
Spain	12.6	13.0	13.2	12.8	12.5	15.8	13.0	0.4
Sweden	12.1	12.3	12.3	12.5	12.5	13.3	12.8	0.7

Source: (Eurostat, 2025).

<https://ec.europa.eu/eurostat/databrowser/view/tec00134/default/table?lang=en> (27.03.2025).

In the years 2010-2022 the food index decreased in nine member states. The rest countries recorded stabilisation or an increase of this value. The highest increase was noted in Lithuania and Slovakia. It is worth adding that in 2020-2022, the increase in the share of food expenditure in total expenditure was caused by the COVID-19 pandemic. Changes in the level and structure of consumer expenditure of EU households often resulted from supply constraints. This was particularly true for categories such as restaurants, hotels, entertainment, fitness, where the decrease in expenditure was caused by long periods of ban on conducting business activity. The phenomenon of limiting expenditure concerned the vast majority of households in the European Union. The decrease in the share of food expenditure experienced by households was therefore most often due to the decrease in the share of expenditure in the area of recreation, tourism and transport. (Konieniowska Rutecka-Góra, Swacha-Lech, Waliszewski 2023, p. 24). Another issue is that an increase in the share of expenditure does not necessarily mean an increase in the value of a given group of expenditure. And finally, the third issue may be related to the deterioration in the income situation of some households that lost their source of income during the pandemic.

Summarizing, on the basis of analysis of food indices, we may reach the conclusion that the standard of living of European Union population is significantly spatially diverse. It presumably results from the general socio-economic development of countries. Particular countries differ as regards the possession of funds, infrastructure, social and environmental conditions, which define the possibilities and the degree of needs satisfaction. It causes that even the countries neighboring directly with each other differ significantly as regards the needs satisfaction of their residents. Countries with the highest standard of living in 2022, measured with the food index, are Ireland, Luxembourg and Austria, while Romania, Bulgaria and Baltic countries are the countries with the lowest standard of living of their residents.

## **Conclusions**

The study of the standard of living serves both cognitive and practical purposes. The cognitive goal focuses on understanding the extent to which the needs of a given population are met, allowing for comparisons across different time periods, social groups, and geographic regions. This deepens our understanding of the nature, trends, development patterns, sources, and socio-economic interconnections of the standard of living. The practical goal involves applying research findings to inform social and economic decision-making. Through systematic analysis, researchers can diagnose the standard of living at a specific point in time, assess its historical evolution, and use this knowledge as a foundation for evaluating broader socio-economic changes. Perhaps most importantly, these research results prove valuable in planning and forecasting socio-economic development (Bywalec, 2022).

Over the past few decades, significant advancements have been made in methodologies for measuring the standard of living. Improvements in measurement accuracy have provided greater insight into various aspects of living conditions and their determinants. Researchers now commonly use a mix of objective and subjective indicators, including partial and composite measures, value-based and quantitative metrics. While new tools such as anthropometric measures, energy consumption indicators, and other alternative methods have emerged, traditional, long-established measures remain widely used. Consumption indicators, despite their limitations and the skepticism sometimes surrounding official statistics, continue to play a important role in assessing needs satisfaction. Their primary strength lies in their objectivity, as well as their long-standing research tradition, standardized methodology, and consistent data collection, which enable long-term and large-scale analyses. Their simplicity and reliability make them accessible and easy to interpret. However, it is important to recognize that consumption indicators primarily capture the material aspects of living standards and do not provide a complete picture of overall well-being. Therefore, to obtain a more comprehensive evaluation, they

should be supplemented with non-economic indicators of both objective social conditions and subjective well-being.

The analysis of the food index, based on Eurostat data, revealed significant spatial disparities in living standards within the European Union. In 2022, Ireland, Luxembourg, and Austria ranked as the countries with the highest standard of living according to the food index, whereas Romania, Bulgaria, and the Baltic states recorded the lowest standard of living.

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ISTVÁN JUHÁSZ<sup>1</sup>

## MOTIVATION OF WORKFORCE IN RUSSIAN AND CHINESE ORGANIZATIONS, USING HOFSTEDÉ'S DIMENSIONS

### Abstract

In response to this fact, many Western companies are now expanding and establishing subsidiaries in China and Russia. Adapting to local values is a consideration for foreign managers (and other employees) when entering foreign markets and cultures. An important aspect is how to motivate employees. Due to cultural differences, how to motivate employees varies widely from country to country. Hofstede analyzed a large database of employee value scores for more than 70 countries collected by IBM between 1967 and 1973; Hofstede's work since 2001 has included scores for 74 countries and regions, replicating and this is an extension of the study. In addition, employees in China and Russia are examined from all angles based on Hofstede's dimensions. In each category of power distance, individualism, masculinity, uncertainty avoidance, and long-term orientation, it is shown how much Chinese and Russian employees scored on each dimension, and based on these values, employee culture, attitudes toward work, and motivation can be characterized. Using Hofstede's five dimensions, we would like to present an interesting study of employee motivation in Chinese and Russian organizations to understand the differences between these two countries and their employees.

**Keywords:** Chinese, Russian, Hofstede's dimensions, motivation

**JEL Codes:** A13, M14

Juhász, I. (2025). Motivation of Workforce in Russian and Chinese Organizations, Using Hofstede's Dimensions. In Conference Proceedings: Full Paper Series of MIRDEC 24th – Istanbul 2025 International Academic Conference on Economics, Business and Contemporary Discussions in Social Science, pp. (21-30). 24-25 April 2025. Istanbul, Türkiye. <https://www.mirdec.com/istanbul2025proceedings>.

### Introduction

Today, Republic of China has a fast growing economy, which is still in a developing phase. According to this fact, nowadays many Western companies have been expanding, and establishing subsidiaries in China (and in Russia too). When expanding to foreign markets and foreign cultures, adaptation of the local values is something, which needs to be considered by foreign managers (and other employees). A vital aspect is how to motivate employees. The way employees want to be motivated may differ a lot from one country to another due to cultural differences (Lemoine and Jansson, 2010).

Next, have a look at some new interesting researches about the motivation of workforce in Chinese and Russian Organizations. This choice of theme is very topical. The paper introduces the 5 dimensions of Hofstede to understand the differences of these two nations and their workforce.

After introducing the researches, the paper gives some conclusions.

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## **The Five Dimensions of Hofstede**

On the webpage of Hofstede (Hofstede, 2012) the followings are written about Hofstede and his model: Geert Hofstede analyzed a large data base of employee values, the scores were collected by IBM between 1967 and 1973 covering more than 70 countries, from which he first used the 40 largest only, and afterwards he extended the analysis to 50 countries and 3 regions. In the editions of Hofstede's work since 2001, scores are listed for 74 countries and regions, partly based on replications and extensions of the IBM study on different international populations.

Subsequent studies validating the earlier results have included commercial airline pilots and students in 23 countries, civil service managers in 14 countries, “up-market” consumers in 15 countries and “elites” in 19 countries.

From the initial results, and later additions, Hofstede developed a model that identifies four primary Dimensions to assist in differentiating cultures: Power Distance - PDI, Individualism - IDV, Masculinity - MAS, and Uncertainty Avoidance - UAI.

Geert Hofstede added a fifth Dimension after conducting an additional international study with a survey instrument developed with Chinese employees and managers. That Dimension, based on Confucian dynamism, is Long-Term Orientation - LTO and has been applied to 23 countries.

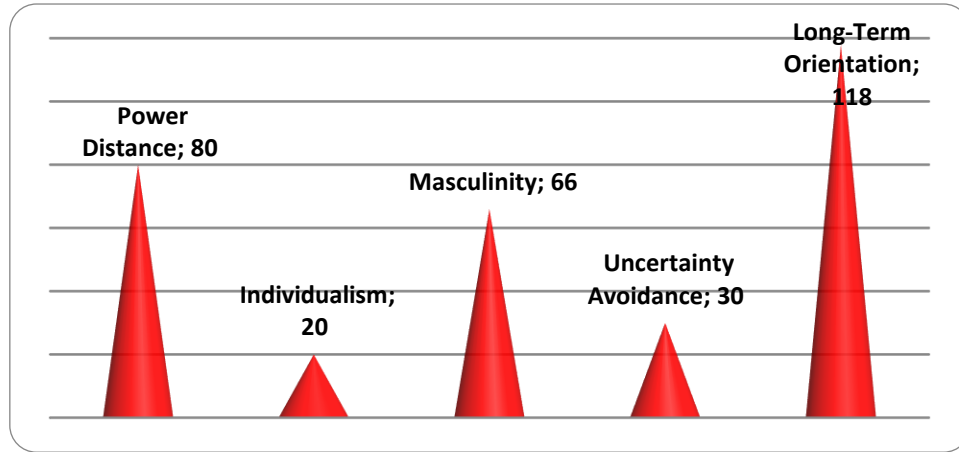
## **Hofstede's Dimensions in China and Russia**

### *Hofstede's Dimensions in China*

Geert Hofstede's analysis for China has Long-term Orientation (LTO), the highest-ranking factor (118), which is true for all Asian cultures. This Dimension indicates society's time perspective and attitude of persevering; which overcome obstacles either with the help of time, or with the help of will and strength. The Chinese rank is lower than any other Asian country's in the rank of Individualism (IDV). It may be partly attributed -compared to Individualism- to the high level of emphasis on a Collectivist society ruled by Communism.

Low Individualism ranking is manifested in a close and committed “group”, depending on the fact whether it is a family, extended family, or extended relationships. Loyalty in a collectivist culture is the most important. Society provides strong relationships where everyone takes responsibility for the favoured members of their group (Hofstede, 2012). The scores are in Figure 1.

**Figure 1. Hofstede's Dimensions in China**



Source: Own elaboration based on Hofstede (Hofstede, 2012).

### *Hofstede's Dimensions in Russia*

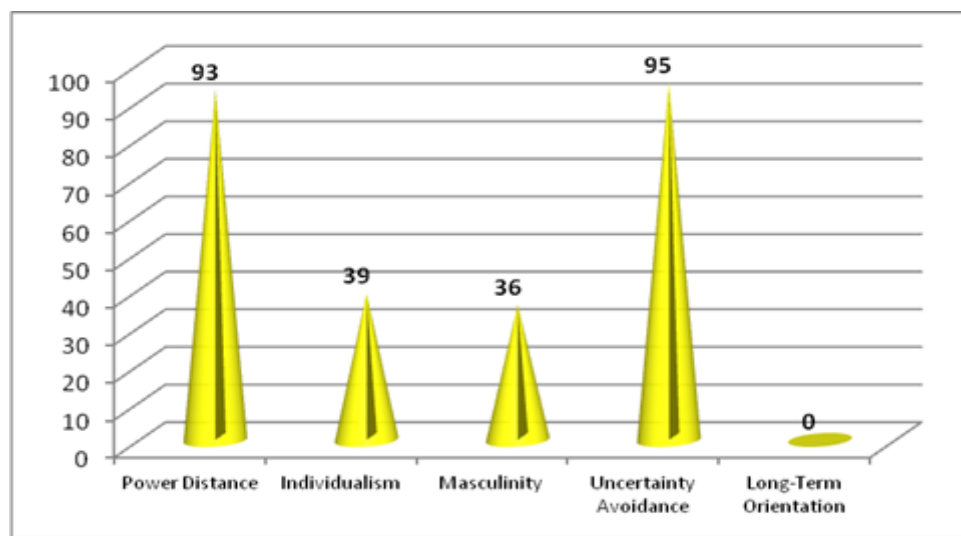
On the webpage of Hofstede (Hofstede, 2012) the next is written about Russia and the Russians. Russia, scoring 93 in Power Distance Dimension (PDI), is among the 10% of the most power distant societies in the world. This is underlined by the fact that the largest country in the world is extremely centralized: 2/3 of all foreign investments go into Moscow where also 80% of all financial potential is concentrated. The huge discrepancy between the less and the most powerful people leads to a great importance of status symbols. Behaviour has to reflect and represent the status roles in all areas of business interactions: being visits, negotiations or cooperation; the approach should be top-down and provide clear mandates for any task.

The fundamental issue addressed by this dimension is the degree of interdependence a society maintains among its members. It has to do with whether people's self-image is defined in terms of "I" or "We". In Individualist societies, people are supposed to look after themselves and only after their direct family. In Collectivist societies, people belong to 'in groups' that take care of them in exchange for loyalty. Russia has Individualism (IDV), with a ranking of 39 compared to a world average of 43. If the Russians plan to go out with their friends, they would literally say "We with friends" instead of "I and my friends", even if they talk about brothers and sisters or cousins, so a lower score of 39 even can be manifested in the language. Family, friends and not seldom the neighbourhood are extremely important to get along with everyday life's challenges. Relationships are crucial in obtaining information, getting introduced or in successful negotiations. They need to be personal, authentic and trustful before one can focus on tasks and build on a careful, rather implicit communication style to the recipient. (Hofstede, 2012).

A low score on the Masculinity Dimension (MAS) means that it is not the dominant values in society. Russia's relatively low score of 36 may be surprising regarding its preference of status symbols, but in Russia these are related to the high Power Distance. At second glance one can see, that the Russians at their workplaces as well as when meeting a stranger rather understate their personal achievements, contributions or capacities. They talk modestly about themselves and scientists, researchers or doctors are most often expected to live on a very modest standard of living. Dominant behaviour might be accepted when it comes from the boss, but is not appreciated among peers (Hofstede, 2012).

The dimension Uncertainty Avoidance has to do with the way how a society deals with the fact that future can never be known: should we try to control future or just let it happen? Scoring 95 (UAI) the Russians feel very much threatened by ambiguous situations, as well as they have established one of the most complex bureaucracies in the world. Presentations are either not prepared, e.g. when negotiations are being started and the focus is on the relationship building, or extremely detailed and well prepared. Also detailed planning and briefing is very common. Russian people prefer to have context and background information. As long as the Russians interact with people considered to be strangers, they appear very formal and distant. At the same time formality is used as a sign of respect (Hofstede, 2012).

**Figure 2. Hofstede's Dimensions in Russia**



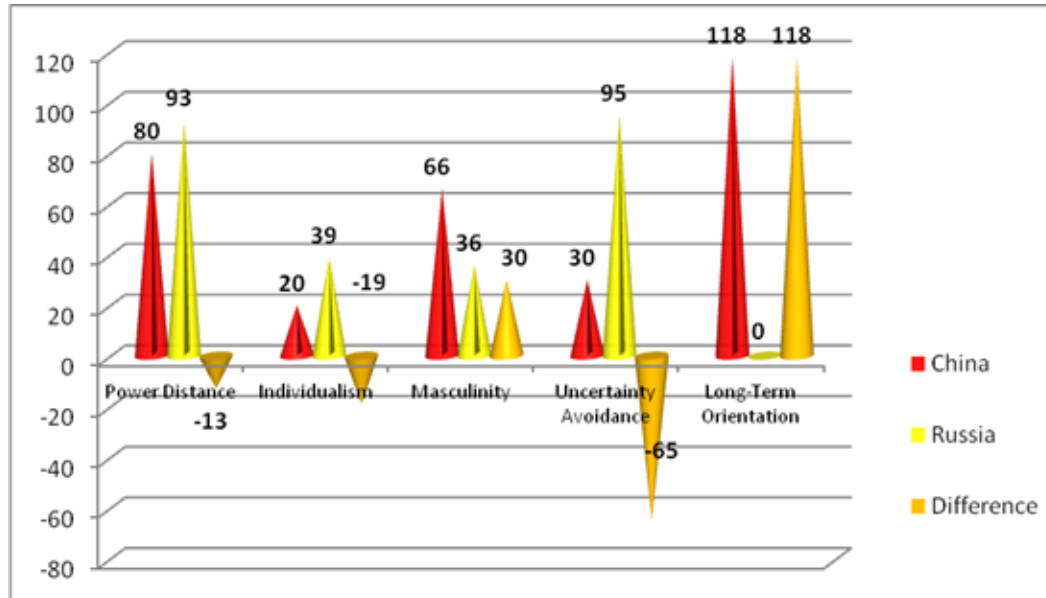
Source: Own elaboration based on Hofstede (Hofstede, 2012).

### Comparing China to Russia in Hofstede's Dimensions

We can see in Figure 3., that the most important differences of the 5 dimensions are in Uncertainty Avoidance (65) and Masculinity (30). I think that the differences in Power Distance (13) and Individualism (19) are not very high. Long-Term Orientation could not be understood as in this case we have not got data about Russia.



**Figure 3. Comparing China to Russia in Hofstede's Dimensions**



Source: Own elaboration based on Hofstede (Hofstede, 2012).

Carl F. Fey edited this publication: Opening the black box of motivation: A cross-cultural comparison of Sweden and Russia in 2002 (Fey, 2005). In this publication, we can read a lot of interesting results about this analysis and I would like to complete the other author's opinion about China.

Russia was not included in Hofstede's original study (just later). However, Elenkov (1997) has subsequently conducted a study based on managers in Russia. Elenkov results are: Power distance 89, Individualism 40 Masculinity 50 Uncertainty avoidance 87. These results show that the Russians are group oriented (Vlachoutsicos, 2001) and prefer avoiding uncertainty. Both might be expected, given the social security imprinted by the Communist system and the surprises dealt to Russia in the past. Russians report medium masculinity and appear to have a fairly high power distance (the extent to which a society accepts that power in institutions and organizations is distributed unequally), reflecting the large social gap that exists between workers and managers in Russia (Fey and Denison, 2003). Further understanding of Russian character is offered by the famous 19th century Russian historian Kliuchevskii. He describes a set of stereotypical Russian behaviours, including resourcefulness, patience under adversity, deprivation, and spurts of energy, combined with a tendency to dissemble and an inconsistency in seeing things through. He also describes the Russians as circumspect, cautious, and ambiguous with a preference for looking back instead of forward. Finally he argues that Russians prefer working in groups and monitoring results rather than setting goals (Kliuchevskii, 1990).

#### *Power Distance*

Of course we must acknowledge that Russians are in a period of transformation and that to some degree includes a slow transformation of values. After the period of totalitarianism in Russia, it is not surprising to realize Russia has high scores on the power distance index. For several hundred years, the Russians lived in strong regime. Prior to Communism, the Tzars, orthodox Church, and landowners used to have tight control. Russian leaders were traditionally comfortable and even preferred acting unilaterally, (Elenkov, 1998) a sign of Russia's large power distance (Fey, 2005).

The Hofstede analysis for Russia suggests a large power distanced society. This is indicated from the fact that Russia is in its midst of change. The traditional caste systems have been outlawed, although the large power distance score indicates that these attitudes have still remained. Russia's Power Distance score was very high for culture, with a ranking of 93 (the sixth highest ranking Hofstede Dimension) compared to a world average of 56.5. This Power Distance score for Russia indicates a high level of inequality of power and wealth within the society. This condition is not necessarily subverted upon the population, but rather accepted by the population as a cultural norm.

China has a high degree of power distance (Hofstede, 1984). A high degree of power distance indicates a very strong hierarchical order, where the power is concentrated to a few people on the top of the hierarchy. Promotions of an employee may therefore, not only result in a bigger salary, but probably also in more power on the employees. This may have an effect on how Eastern employees become motivated by career opportunities or promotions. If this is not considered by the managers, this may result in a gap of misunderstanding regarding motivation of the Eastern employees (Lemoine and Jansson, 2010).

#### *Individualism / Collectivism*

Individual accomplishment in Russia has historically been closely associated with achieving the objectives of social collectivism. Further, it is well-known that the basic building blocks of Communist society were the group. Traditionally, individuals in Russia who tried to appear better than the group were viewed with suspicion and contempt as individualistic traits were considered destructive to group harmony (Elenkov, 1998). Thus, it is not surprising that after many years of Communism, the Russians continue to score low on individualism (Fey, 2005).

The Chinese business culture is mostly impregnated by the collectivistic way of thinking. These values will be even clearer while studying how Chinese people behave or act while meeting other people. In the Chinese business culture people are described as a social group, more than an individual. A person is seen as a part of a society or cultural environment (Hofstede, 1984).

#### *Femininity / Masculinity*

Comparing to the world average (51), Russia has the eleventh lowest ranking (36) of Masculinity on the Hofstede Dimension. After living for many years in a society, where one had little ability to influence one's future, it is not surprising that the Russians scored low on Hofstede's masculinity dimension (Fey, 2005).

China is highly ranked on the masculine scale (Hofstede, 1996). The same argument as for collectivism can be used, there were no direct questions regarding masculinity, and since it was not mentioned, it may suggest that the degree of masculinity do not affect the way the studied companies do business. A conclusion coming from the above may be that either this cultural difference may not have any practical impact on the organizations' view on different cultures; or it may suggest that China is becoming less masculine. Either way, there were no indications that the degree of masculinity would contribute to a gap between Western managers and Eastern employees and their views regarding motivation (Lemoine and Jansson, 2010).

#### *Uncertainty Avoidance*

The Russians scored high on uncertainty avoidance explaining why a Communist system was attractive to many Russians. The wish for the increased security about their future was commonly mentioned in

interviews for the current study and suggested by other authors (Elenkov, 1997) thus indicating a high degree of uncertainty avoidance.

An analysis may show that the power distance within the Chinese organization is high since the description of authoritarian management fits with Hofstede's description of a society with high power distance; people without power in a society accept and expect that only few people in the society have the power (Hofstede, 1984). With only a few people having power, promotions could mean highly increased power for the promoted people, this can be something important to bear in mind when trying to motivate Chinese employees. Not thinking "outside of the box" indicates that there is a high degree of uncertainty avoidance among the Chinese employees as well. An unwillingness to think innovative fits also with how Hofstede (1984) describes uncertainty avoidance; a person belonging to a society with a high degree of uncertainty avoidance is less likely to take risks. They also generally favor adhering to societal rules or the behavior of those nearby. Due to considerable uncertainty avoidance, managers ought to reconsider using challenges to motivate their Chinese staff (Lemoine and Jansson, 2010).

#### *Long / Short Term Orientation*

This fifth dimension was found in a study among students in 23 countries around the world, using a questionnaire designed by Chinese scholars. It dealt with Virtue regardless of Truth. Values associated with Long Term Orientation are thrift and perseverance; values associated with Short Term Orientation are respect of tradition, fulfilling social obligations, and protecting one's face. Both the positively and the negatively rated values of this dimension are found in the teachings of Confucius, the most influential Chinese philosopher who lived around 500 B.C.; however, the dimension also applies to countries without a Confucian heritage (Hofstede, 2012). Hofstede found that China has the highest long-term orientation among the Asian cultures.

A deeper understanding of Russian characteristics is provided by Kliuchevskii (1987), who describes a set of stereotypical Russian modes of behaviour. Being resourceful and cautious, the Russians face adversity and deprivation. They have learned how to stay calm and find creative solutions to situations that would lead to crisis for the average American. Living in the present, they tend to focus more on what is going on around them rather than on the larger picture or the long-term ramifications of their actions. Hence, they are very good at monitoring current conditions, but not as good at developing and working steadily for long-term goals. They like breaking larger projects into smaller parts. Ambiguous situations are familiar for them, and they are good at taking whatever uncertainty exists and twisting things so that the situation portrays the picture they find most useful. They can also be hard workers, but intense activity is normally followed by idle periods. The group, says Kliuchevskii, is the traditional building block of the society, which means the Russians prefer working together in groups rather than individually (Fey, Nordahl and Zätterström, 1999).

#### **Chinese or Russian Workforce? (Conclusion)**

Chinese or Russian Workforce? If I were a boss of an international company, would I choose a Russian or a Chinese employee for a job? This is a good question. But what is the answer? It is very hard to give a good answer for this question. Why? Because it depends on a lot of circumstances. For example: on the project, conditions of work, working alone or in a team, place of project, etc., and last but not least on the personality and the nationality of the employees and their workplace.

In all probability, a Chinese employee will be in my company thrift and perseverance, (Chinese people gave the most Long-Term Orientation answers of the questionnaire of Hofstede (score 118). The Chinese nation is one of the most collectivist nations of the world, so the employer-employee relationship is perceived in moral terms, like a family link (Heidrich, 2006). Chinese management is a

management of groups and not the management of individuals, so I should take it into account. Managers are expected to be decisive and assertive.

And what about their motivation? They are motivated to learn how to do things, and they have a big motivation to provide college or university degrees, because it means they enter into higher status groups. For them it is very important to maintain harmony and to avoid direct confrontations in the workplace. China is rather a masculine nation, so Chinese men are assertive, ambitious and tough and they live in order to work. In Chinese organizations, there is a very strong hierarchical order, where the power is concentrated to a few people on the top of the hierarchy (Heidrich, 2006). If I wanted to motivate my Chinese colleagues, I should not only give them a bigger salary, but probably also more power on the employees. They stress on equity, performance among colleagues. He/she also usually prefers following the rules of the society or the pattern of people around him/her. Because of a high degree of uncertainty avoidance, managers should think twice of using challenges as a way to motivate their Chinese employees (Lemoine and Jansson, 2010). In Henley and Nyaw's (Henley and Nyaw, 1987), it is suggested Chinese workers had placed great emphasis on material incentives such as wage increases and bonuses over non-material stimuli such as recognition or a "model worker" award.

According to Terence Jackson (1998), Chinese workforce will be motivated by the following things: rule enforcement, external rewards, internalised motivation, intrinsic motivation.

And what about the Russian workforce?

Fey said (2005) Russian managers, arguably at a lower level of the needs hierarchy, were best motivated by salary level and provision of bonus. And it is less important for Russians who have been faced with much inequity in the past and have developed mechanisms to cope with similar situation.

A study - from Linz in 2004 - about a generational difference in response patterns regarding the relative importance of the 11 job motivators used in Russia. Younger respondents placed a higher value than did older respondents on the opportunity to develop skills and abilities, getting a promotion or better job, and the chance to accomplish something worthwhile. Younger respondents placed a lower value on the amount of pay received, the amount of security associated with the job, the respect received from co-workers, and the friendliness of co-workers than did older respondents. Both generations agreed that payment was at the top of the ranking of these job motivators in terms of relative importance, and praise from supervisor was at the bottom of the ranking (Linz, 2004).

A study said that most Russians preferred statesman-type leaders, who were task-oriented democrats, showed that Russians not only preferred directive leaders but they also felt that effective leaders should prioritize task accomplishment over relationship building. This means that as long as the task is in focus, the Russians perceive the leader as quite effective even if he is not authoritarian in personal style. This is contrary to Russian traditions, which have primarily seen authoritarian leaders (military-man was ranked only third). Based on the results of this study, it appears that Russian leadership preferences are coming closer to, but not identical to, those which we would expect to find in the USA or Western Europe (Fey, Adaeva and Vitkovskaia, 2001).

In an other study we can read: therefore, we believe that Senior Local Middle Managers (SLMM) may be more strongly motivated by having friendly relationships with colleagues, support from peers, and less competition than those in the other three subgroups (Astkhova, Dubois and Hogue, 2010).

So, the question is: Chinese or Russian Workforce? I do not know the right answer, but I know the United States and Europe have to count for the young, hard-working, creative crowd of Chinese and

Russian workforce in the future. And if they want to employ these employees, they had better to know the cultures of these nations.

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**CARMEN LAZAR<sup>1</sup>**

## **COMPARISON BETWEEN DIRECTIVE 33/2013/EU AND 1346/2024/EU LAYING DOWN STANDARDS FOR THE RECEPTION OF APPLICANTS FOR INTERNATIONAL PROTECTION**

### **Abstract**

Within the immigration policy of the European Union, the directives laying down standards for the reception of the applicants for a form of international protection (especially the asylum) play a key role, because it is about the welfare of the people who are in need and come in the European Union for non-economic reasons. So, at the European level the necessity was felt to unify the standards of life or at least to establish a minimum for all the States, on one hand in order for the Union not to risk condemnations from the European Court of Human Rights for inhuman or degrading treatments (because the bad conditions of life were considered as such), on the other hand in order for the States who offer better conditions not to be flooded by the asylum applicants, which is not equitable. Thus, each State must offer the minimum established by the European legal acts, even if for this it must be helped by the Union. Initially there was the Directive 9/2003/EU, repealed later by the Directive 33/2013, which in turn was repealed by the Directive 1346/2024 but is still in force, because the last directive applies only from June 2026. We intend to compare the two last directives, in order to see if the adoption of the last one constitutes or not a progress.

**Keywords:** Directive, immigration policy, standards, asylum, applicants

**JEL Codes:** K37

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### **1. Introduction**

The immigration policy of the European Union comprises a series of normative acts which are destined to establish the state which is responsible for the processing of an asylum application and to unify the entry and the stay of the foreigners on the territory of the Union, the conditions in which the international protection (the most important form being the asylum, this is why we will use only this term for all the forms) is granted, the treatment of the applicants for international protection, some of these being already presented by us. Some of them were regulations, others were directives, but at the present time the Directive 2024/1346 is the only directive left in this matter, which means that the Union law moves towards more uniformity in this field. For those who are not jurists specialized in the Union law, the regulations impose uniform rules for all the Member States and do not need implementation by national laws, while the directives are instruments of harmonization, imposing only the lowest common denominator, thus respecting the national traditions and practices, and must be implemented through national laws. Or, concerning the minimum standards for the conditions of reception of the applicants - the objective of the directives which we deal with -, the economic situation of the States is very different, so it was not possible to standardize the conditions, unlike the formal guarantees and the procedures,

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even if the preamble of the directives states that the aim is to ensure the equal treatment of the applicants and comparable living conditions throughout the Union (Balza, 2024: 209).

The directives which lay down the minimum standards for the conditions of reception of the applicants are very important, because it is about the well-being of the applicants, the bad conditions of life being considered by the European Court of Human Rights as equating an inhuman or degrading treatment. And, if some States offer lower conditions than the others and under the necessary minimum, this is perceived as not being equitable, contrary to the solidarity and the fair sharing of responsibility and, moreover, encourage the secondary movements which the entire asylum system fights. On the other hand, the lowest common denominator is of a nature to water down the rights, both substantive and procedural, of the applicants (Tsourdi, De Bruycker, 2022: 7 and 47), even if, in practice, as these authors showed, many Member States assured a high level of protection of the applicants' rights (Tsourdi, De Bruycker, 2022: 6 and 54).

The acts in question are the Directive 33/2013/EU<sup>2</sup> and 1346/2024/EU<sup>3</sup>, another directive - 9/2003/EU<sup>4</sup>- being repealed by the first of the former mentioned; it is to say that the Directive 33/2013 contains itself many differences in comparison with the Directive 9/2003 (see for these differences Pop, 2022: 93), illustrating, as other European normative acts, the reform of the entire Common European Asylum System, reform triggered after the Treaty of Lisbon (Pop, 2022: 90; Eyselein, Sanders, Stefani, 2019: 3-4). The first is still in force because of the delayed application of the second. A comparison between them is necessary, in order to see if the second constitutes a progress in relation to the first and if the adoption of a new one was necessary instead of a modification of the first.

## 2. Content of the Two Directives

Of course, there are differences of structure (in the manner in which the directives are structured) and wording of the provisions, but we are not interested in them and, sometimes, they do not change the essence of the problem. So, we will mention only the differences in the real content of the two acts.

A first difference appears in the part defining the notions used by these acts, more precisely in the definition of the family members: if the former directive does not say what it is understood by unmarried minor - case in which reference must be made to the national law of that minor -, the new directive specifies that a minor will be considered as unmarried if the marriage could not take place in the host State having regard to the legal age of the marriage. This provision is favourable to the minor applicants, but it is contrary to the international law, which requires that the personal status be governed by the national law of the person in question. For the rest, the two directives are identical and consistent with other normative acts of the Union in the field of migration: by family members are understood the spouse or the unmarried partner, if the law of the host State treats the partners as spouses, the unmarried minor or unmarried dependent adult children of the applicant or of his/her spouse/partner, born in or out wedlock, the father, mother or other adult responsible for the unmarried minor children, including an adult sibling by the new directive, which is normal.

The notion of representative for the unaccompanied minors is taken in the new directive with the same content, unfortunately erroneous: this person assists and represents the minor. Or, as we showed in a previous article, the assistance and the representation are not only different but also incompatible, because the first supposes that the minor concludes himself the legal acts but with the approval or the help of the representative, while the representation supposes that the legal acts of the minor will be

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<sup>2</sup> Published in the Official Journal of the European Union L 180 of 29<sup>th</sup> of June 2013.

<sup>3</sup> Published in the Official Journal of the European Union L of 22<sup>th</sup> of May 2024.

<sup>4</sup> Published in the Official Journal of the European Union L 31 of 6<sup>th</sup> of February 2023.



concluded by the representative in the name of the minor. In the national legislations it is expressly provided the age below which the minor is represented and above which he is only assisted. It would have been better for the directives to refer to the national laws in this respect.

The clause of more favourable provisions is kept. It allows to the Member State to apply more favourable conditions of reception for the applicants for asylum, if their law is not incompatible with the directives. Both directives provide for the right for the States to require a medical screening on grounds of public health. What can this mean? That an applicant will not be received if he has a disease which endangers the public health? The answer is not obvious.

The provision referring to the information given to the applicants on the reception conditions is essentially the same, but with more useful details added by the new directive such as information on the organizations or groups which provide help and assistance to the applicants, on the possibility of translation of the information, on the means adapted to the unaccompanied minors etc.; moreover, the term-limit within which the information must be given is shorter than before (3 days from the lodging of the application, 15 days before). The information must be given in a language that the applicant understands or he is supposed to understand, which is very important: without it the access to the rights granted by the directive would be illusory and the efficiency of the directive would be eroded (Bucur-Ioan, 2012: 137-138). Also, the provision of the document which allows the applicants to stay in the respective State is essentially the same (the term-limit differs, being of 3 days in the former directive, while not being provided for at all in the new), but this time the new directive eliminates some exceptions from the old directive in this respect: it was about the applicants who are in detention or whose applications were made at the border or within a procedure to decide the right to enter the territory, in the former directive the States having not had the obligation to grant these applicants the documents mentioned above. The new does not anymore provide nothing about this, which must be interpreted that the applicants who are in the mentioned situations have the right, they too, to the necessary documents. Another difference concerns the issuance of a travel document: while in the former directive the States might issue one if the applicant needed to be present in another State for serious humanitarian reasons, the new provides that the issuance is possible *only* (so, a limitation for the States) for serious humanitarian reasons *or other imperative reasons* and *that the validity of the document is limited to the purpose and the duration necessary for the reason invoked* (another limitation for the States).

Regarding the reception conditions, the new directive specifies that the States are free to organize and manage their systems, in accordance, of course, with it. This supposes also the allocation or re-allocation of the applicants to the places of accommodation, the States being obliged to take into account the family unity and the specific needs, if any, of the applicants. In the former directive the State could decide on the residence of an applicant in a specific place<sup>5</sup> for reasons of public interest, public order or effective processing and monitoring of the application, while in the second it is about the public order or the risk of absconding created by the applicant. In such a case (the obligation of an applicant to reside in a specific place), the material conditions granted to the applicant may be subjected by the host State to the compliance with this obligation. Moreover, the second directive adds: the possibility for the States to institute for the applicants the obligation to report, at a specified time or at reasonable intervals, on the compliance with the obligation of residence; the possibility for the States to give the applicants permission to leave temporarily the specific residence; the obligation for the States to ensure the judicial review, *ex officio* or at the request of the applicant, against a decision of assignment to a specific residence, a decision instituting the obligation to report, a decision refusing the permission to

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<sup>5</sup> If this place is a transit area, a closed and restricted perimeter within which the movements are limited and overseen and which cannot be left voluntarily, it constitutes a detention (see the Decision of the ECJ "FMS and FNZ" 924/19 and "SA and SA Junior" 925/19 of 14 May 2020, on the site europa.eu). Even if one may say that the person can leave the territory of that Member State for a third-State, so she is not really detained, the Court stated that the fact of leaving would deprive her of the right to apply or to maintain the application for asylum.

temporarily leave the specific residence. In both directives the State can restrain the territorial area of movement of the applicants, but with the specification that the sphere of the private life and the access to all the benefits granted by the directives must be respected, and, in the second one, that the reason may be only the effective and efficient processing of the applications, taking into account also the capacities of the areas concerned; moreover, the second provides that the access to the substantial and procedural rights granted by it to the applicants be ensured within the area concerned. For this case, both directives provide the possibility that the applicants be allowed by the States to leave temporarily the area in which they have been allocated, but the second is more detailed, providing that the reasons must be familial or medical and be urgent and serious and providing that the decision refusing the permission to temporarily leave the area must be subjected to judicial review (appeal or other remedy).

Both directives allow the States to detain an applicant not as a punishment, but as an administrative measure for certain reasons, which are essentially the same: the determination of the identity or the nationality of the person, the determination of the elements on which the application is based and which cannot be obtained without detention, the protection of the public order or the national security<sup>6</sup>, the decision on the right to enter the territory, the removal of the person according to a return decision, if there are reasons to believe that the person makes the application only to delay or frustrate the enforcement of the return decision, the transfer of the person to the responsible State for the examination of the application, if there is a risk of absconding or a threat to the public order or to the national security; to ensure compliance with the obligation of an applicant to reside at a specific place, if there is a risk of absconding (only in the second directive)<sup>7</sup>. In any case the measure may not be taken only for the reason that the person is an applicant for asylum, on the ground of her nationality (in the new directive), for the reason of the lack of the accommodation places for foreigners<sup>8</sup> or for the reason that the applicant is unable to support himself<sup>9</sup>. Moreover, the measure of the detention may be taken only if there is not an alternative measure, less coercive, such the regular reporting to the authorities, the deposit of a financial guarantee, the obligation to reside at a specific place. The second directive adds the obligation for the States to take into account any visible signs, behaviour or statement which indicates that the applicant subject to the detention has specific reception needs, in order to establish if the detention can continue or not.

Both directives provide procedural guarantees for the detained applicants. The detention must last only as long as the grounds mentioned above apply and for a period as short as possible. The decision taken by an administrative authority must be judicially reviewed at the request of the person or *ex officio*<sup>10</sup> and the review must take place as soon as possible and must last as shortly as possible (the second directive provides for precise time-limits). Also, the detention must be judicially reviewed at reasonable intervals of time, *ex officio* or at request, especially when, in a case of a prolonged duration, new circumstances arise or new information come and may affect the lawfulness of the measure; the second directive provides, moreover, that for the unaccompanied minors the review must take place *ex officio* at regular intervals (not specified, however). If the decision has been declared unlawful, the detention must

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<sup>6</sup> The Court of Justice stated that the illegal stay is not in itself a threat to the national security or to the public order, so it cannot justify the measure of the detention (see the Decision "M.A." 7/22 of 30 June 2022, on the site europa.eu).

<sup>7</sup> This is why we consider incomprehensible the affirmation of an author according to which the first directive did not specify the conditions for the detention, which was matter for divergent interpretations! (Bucur-Ioan, 2021: 138).

<sup>8</sup> See the Decision of the ECJ "VL" 36/20 of 25 June 2020, on the site europa.eu.

<sup>9</sup> See the Decision of the ECJ "FMS and FNZ" 924/19 and "SA and SA Junior" 925/19 cit.

<sup>10</sup> This term implies also the possibility of the judicial authority to take into account a ground of illegality which has not been invoked by the applicant (see the Decision of the ECJ "Secretary of State for Justice/C. and B." 704/20 and "X./Secretary of State for Justice" 39/21 of 8 November 2022, on the site europa.eu).

immediately end<sup>11</sup>; the same if the time-limits provided for the review of the measure have not been respected. For the judicial review of such a measure the applicants must have access to legal assistance in principle free of charge, but the States might and may restrict the free character to some cases: in the first directive the right was restricted to those who lacked sufficient resources or had recourse to special legal services and the States might provide that the applicants whose financial situation has improved or who gave false information on it must reimburse totally or partially the costs; in the second directive, apart from the applicants who lack sufficient resources and to those who have recourse to special legal services, the free assistance may be refused also to those who have recourse to non-governmental organizations accredited for applicants for asylum and to those whose appeal has no or little chance of success. The States might and may provide that the treatment of the applicants for asylum in this matter is not more favourable than that of their nationals.

In both directives there are detailed provisions regarding the detained applicants, provisions which are absolutely identical. In this respect, the applicants must be kept, if possible, in special facilities and not in prisons and, if it is not possible, they must be kept separately from the ordinary prisoners. In the case in which this also is not possible, they must be separated from other third-country nationals, who had not lodged an application for international protection. In any case the States must ensure the application of the provisions of the directives concerning the material conditions of detention. So, the applicants have the right to an open-air space and to communicate, in conditions of privacy, with the representative of the United Nations High Commissioner for Refugees (UNCHR), with other non-governmental organizations which activate in this field, with family members and legal advisers or counsellors, even if restrictions may be imposed for reasons of public order, security or administrative management of the facility (but not for the communication with the UNCHR). A special provision is dedicated in both directives to the vulnerable applicants or applicants with special needs, but there are also some differences. First, the health - physical and mental - of the persons detained must be the concern of the host State, which must assure monitoring and support; the second directive adds that, if the health of the person does not allow the detention, this last shall not be ordered. Second, if in the former directive the minors could be detained only as a measure of last resort (but we saw that this was the rule also for adults!) and even exceptional for the unaccompanied minors (and, as far as possible, they had to be kept in special facilities appropriate to them), the States having had to keep the unaccompanied minors separately from adults (if this was the case) and to make efforts to place the minors in general in accommodation suitable for them, in the new directive this becomes the rule, so also for the unaccompanied minors<sup>12</sup>; the exceptions are only the cases in which the primary care-giver of the minor is detained, he too<sup>13</sup>, and that in which the detention is a mean of safeguarding the unaccompanied minor, in both cases the detention having to be as short as possible. Moreover, the detention of the families with minors must, as a rule, take place in special facilities, appropriate for them. Of course, the best interest of the minors must be taken in consideration by the States all the time, in both directives. The detained minors have the right to engage in leisure activities, including play and recreational activities, but the second directive adds the right to education, excepting the case in which the detention is too

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<sup>11</sup> The Court of Justice has stated that the unlawfulness of a first decision ordering the detention does not affect the lawfulness of a second decision with the same object, based on another legal ground, even if between the two decisions a certain amount of time has passed and the person has not been released within it; for this reason the State is not anymore obliged to release the person (see Decision "Bouskoura" 387/24 of 14 October 2024, on the site europa.eu).

<sup>12</sup> An author stresses, however, that, considering the fact that this is about a directive, the States have more freedom and flexibility in implementing this provision (de Lima, Díaz Arce: 2024: 10).

<sup>13</sup> Although some (scholars, non-governmental organizations, United Nations officials) consider that it is contrary to the children's rights and to their's best interest invoked by the European acts (de Lima, Díaz Arce: 2024: 10-11). Also, the European Court of Human Rights has condemned more Member States for the detention of children based on their or their's parents status of migrants (refugees or not) (see in de Lima, Díaz Arce: 2024: 4-8).

short for the education to count<sup>14</sup>. In both directives the families must be detained separately, with the assurance of the privacy. Also, both provide that the females must be kept separately from males, excepting the case in which they are family members and consent to be together and excepting the spaces for leisure, recreational or social activities and that of provision of meals. There is the possibility of derogation for the States in the cases in which the applicant is at the border or in a transit area, but the categories of persons for which the derogations apply are slightly different in the new directive from the first: in this last it was about the right of the minors to leisure, recreational or play activities, the conditions of detention of the families and the females, while in the new one it is about the unaccompanied minors (the detention in special facilities, as a rule), the conditions of detention of the families and the females.

Both directives provide the obligation for the States to protect the family unity when they assure housing for an applicant. This means that the applicant will receive the same dwelling for him and his family, if he wants this.

A provision is dedicated in both directives to the education of the minors - children of the applicants or applicants themselves. The right to education is a right of the minors (excepting the case in which a measure of expulsion was taken against the applicants) and the time-limit within which it is granted starts since the lodging of the application, not since its making (which is not normal). But there are some slight differences between the two normative acts: in the former the education was provided in accommodation centres (and we can wonder why, because the minors do not necessarily lodge in such centres) and might be confined to State system (which means the curriculum? it is not clear), while in the second it will be provided within the general education system, which is more normal; exceptionally and only for a month, the education may be provided out of the general education system. Then, the access to education had to be assured no later than 3 months from the date of the lodging of the application, while at the present time the time-limit is of 2 months. The second directive has a paragraph which does not exist in the former, referring to the fact that the specific needs - including those of health - of the children must be taken into account and the education must be of the same quality and integrated with that of the States' nationals (we can wonder what this means!); the States will make efforts to ensure the continuity of the education, excepting the case in which a measure of expulsion was taken against the applicant. In both directives it is provided that the access to secondary education will not be blocked only for the fact that a minor became an adult, but they do not speak about the higher education or the education of the young adults. The States ensure preparatory classes or language courses, if necessary. Also, if the specific situation of a minor does not allow the provision of the education as established, the States must find other arrangements, according to their laws or practice.

Concerning the employment of the applicants, in both directives the States must ensure the access to the labour market within a time-limit, which differs from the first directive to the second (9 months in the former directive, 6 months in the new) from the lodging/registration (the first term is used by the former directive, the second by the new) of the application, if a decision on the application has not yet been taken<sup>15</sup> and the delay is not attributable to the applicant<sup>16</sup>; this is done in the conditions provided for by their national laws, but these conditions must not impede the effective access. A second difference is

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<sup>14</sup> The same author considers that the new directive (as the former, we would add) does not provide for precise guidelines for the detained minors, which leads to more freedom and autonomy of the States in this respect (de Lima, Díaz Arce: 2024: 10).

<sup>15</sup> And irrespective of the fact that a decision of transfer of the applicant in the responsible State has been adopted (see the Decision of the ECJ "K.S. and M.H.K." 322/19 and "R.A.T. and D.S." 385/19 of 14 January 2021, on the site europa.eu). According to this decision, the applicant has the right to work until the transfer is effected.

<sup>16</sup> This is not the fault of the applicant if he lodged an appeal against the decision which refuses him the asylum or if he does not lodge an application in the State of first entry (see the Decision of the ECJ "K.S. and M.H.K." 322/19 and "R.A.T. and D.S." 385/19 cit.).

that, in the second directive, if a State has recourse to the accelerated procedure for examining the application (provided for in another normative act of the Union), the access to the labour market will not be granted or it will be withdrawn; this means that the States are obliged not to grant the access or to withdraw it. We can wonder why it is not a right, but merely an obligation. In our opinion it is so because there is also a European interest in question, not only a national one; the access of the third-country nationals competes with that of the nationals of other Member States, so it restricts the chances of those last to find jobs. A third (slight) difference is that, for reasons of labour market policies (including the unemployment youth levels in the actual directive, which is meaningless), if in the former directive the States might give priority to the Union citizens and nationals of the States parties to the EEA Agreement<sup>17</sup>, in the actual directive the priority may be given also to stateless persons residing in the host State and after a procedure of verification if a vacancy at an employer can or not be filled with a person from one of the categories mentioned. Finally, a fourth difference is that in the new directive the access to the labour market is withdrawn for the applicant who has been notified a decision of transfer in the responsible State for the examination of the application. More important, the actual directive contains detailed provisions regarding the equal treatment of the applicants for asylum, when they have the right to work, with the nationals of the host State (and, we can add, with other Member States' nationals and nationals of the States parties to EEA Agreement), concerning the following aspects: terms of employment, the minimum working age and working conditions (including pay and dismissal, working hours, leave and holidays, as well as health and safety requirements at the workplace), freedom of association and affiliation and membership of an organization representing workers or employers or of any organization whose members are engaged in a specific occupation (including the benefits conferred by such organizations), education and vocational training, recognition of diplomas, certificates and other titles of qualification, access to appropriate schemes for the assessment, validation and recognition of skills or experience. However, by exception to all this, the States may exclude the applicants from the management of the public bodies and from holding an office governed by public law (we can observe the fact that this is not really an exception from the affiliation and membership mentioned above, because these have nothing to do with the public bodies!), as from grants and loans related to education and vocational training, the payment of fees for the access to university or post-secondary education, education and vocational training which is not provided within the framework of an existing employment contract. Also, the States may exclude the applicants, *for at least 3 months from the date of the application* ("at least" seems illogical, it would normally have been "at most", otherwise the exclusion might be without limit of time), from the recognition of the titles of qualification and from the schemes of assessment, validation and recognition of skills or experience. The equal treatment applies also to the social security, but here too the States may except those benefits which are not dependent on period of employment or contributions; on the other hand, this right does not give a right to reside if the applicant has lost his right to remain on the territory of the Union (which goes without saying). Both directives provide that the access to the labour market may not be restricted during an appeal against a decision to reject the application, if the appeal has suspensive effect, so the applicant has the right to remain on the territory until a decision on the appeal is notified.

Concerning the vocational training, it was not a right in the former directive, but only a possibility for the States, while in the new directive it is a right. In both directives this possibility/right existed, respectively exists irrespective of the access of the applicants to the labour market, excepting in the former directive the vocational training related to an employment contract. The new directive does not anymore say anything about this aspect. In exchange, it introduces a right to language courses or to civic education courses, also irrespective of the access to the labour market, but the States may require to the applicants who have sufficient means to cover totally or partially the costs of the courses.

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<sup>17</sup> European Economic Area, which comprises the European Union and the States members of European Association of Free Trade (Norway, Liechtenstein, Switzerland).

The aspect of the material conditions assured to the applicants in the host State was and is of high importance for the immigration policy of the Union, given what we said at the beginning. As a general rule, the access to the material conditions must be granted as soon as possible from the making<sup>18</sup> of the application, including the applications made at the border or in transit areas and excluding those for diplomatic or territorial asylum made at the consular/diplomatic representations of the States, and as long as they are allowed to remain on the territory<sup>19</sup>. The conditions must assure an adequate standard of living (not defined), at the level assured for their nationals; the States may derogate from this level (in the sense that they may assure a lower one) if a part of the living is assured in kind or if the national level is higher than that prescribed by the directives. It is allowed to the States, in both directives, to assure the material conditions only to those who do not have sufficient resources and to ask for the refund of the costs if they find later that the applicants had sufficient resources at the time when the basic needs were covered; the new directive adds the necessity for the States to respect the principle of proportionality, the individual circumstances, the personal dignity and integrity and the special needs when they assess the existence of the sufficient resources of an applicant.

Both directives provide that the material conditions may be assured in financial allowances, vouchers or in kind, for example the housing; this last must be premises at the border or in a transit area, accommodation centres, private houses, flats, hotels etc., on the condition that they assure an adequate standard of living<sup>20</sup>. Only exceptionally the States may have recourse to another forms (when an assessment of the needs of the applicant imposes it or when the housing capacities are temporarily exhausted or unavailable), but for a period as short as possible; if in the former directive only the basic needs had to be covered, in the new directive it is provided that the access to health care and a standard of living in accordance with the Union law and the international law must be assured. Irrespective of the form chosen, the premises must assure the protection of the family life, the communication with the representative of the UNCHR, family members, legal advisers or counsellors, non-governmental organizations and the access of all these at the premise; this access may be restricted only for reasons of security of the premise or of the applicants. If the housing is assured in the form of premises at the border/in a transit area or in accommodation centres, the States are obliged to take into account the gender and age-specific concerns and the situation of the vulnerable persons, as they must prevent the assault (including harassment and sexual assault) and violence (while the former directive referred only to gender-based violence, the new one refers also to the violence based on racist or religious motive). For the dependent applicants with special reception needs, whose family members or relatives live legally on the territory of the host State and are responsible for them, this last must assure their accommodation together with their family members or relatives. The transfer of the applicants from one housing facility to another may take place only when is necessary. The personnel working in the accommodation centres must be adequately trained and be bound by the rule of confidentiality. The

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<sup>18</sup> The term "making" is not the same as "lodging" or "registration". Or, the directives do not specifies its meaning, which is of a nature to create confusions (Silga, 2018: 100). According to the proposal of the Commission for a new Regulation establishing a common procedure for international protection, "the making" means the expression of the will to apply before the officials of the competent authority.

<sup>19</sup> See also the Decision of the ECJ "Changu" 352/23 of 12 September 2024, on the site europa.eu. Although it may seem logical that the right to remain is illustrated by a document emanating from the State, this interpretation - given by the States themselves - is of a nature to undermine the access of the applicants to the rights conferred by the directive, the applicants being, moreover, assimilated to the illegally staying foreigners within the period of time before the issuance of a document (Silga, 2018: 103). If we agree with this point of view, we must admit that being allowed to remain stems, in the absence of a document not yet issued, from the fact that the State did not take against the applicant a measure of removal. Besides, such a measure is not legally possible as long as an application has been made.

<sup>20</sup> Some consider that the former directive did not give procedural standards on the reception conditions and that, in the cases in which it did this, it did not impose the monitoring by the States of the application of the standards, especially in the accommodations run by private actors, but even in centres run by the public bodies (Mugnaini, 2017: 54).

applicants may be involved in the management of the centres, both for the material and non-material aspects of life, through advisory boards or councils.

In the new directive the States may allow the applicants to perform voluntary work outside the accommodation centres, according to their national laws. We may wonder why this provision appears in the article related to accommodation, because it has nothing to do with this aspect.

In both directives there is an article dedicated to the health care for the applicants, but the new directive is more detailed (even if sometimes the details are not necessary). The States must ensure at least the emergency care and the essential treatment of illnesses, including the mental ones, and to take into account the applicants with special needs; here the new directive specifies that these applicants must benefit, when necessary, from rehabilitation or assistive medical devices. The new directive makes in plus reference to generalists and specialists physicians, to the adequate quality of the care, to the sexual and reproductive health if this is necessary in addressing a serious physical condition; it specifies, without necessity, that the access to the health care is irrespective of the fact that the applicants are present in the State in which they must be or in another (the old directive did not say anything about this, which may be interpreted as meaning the same thing as that expressly provided in the new one). The new directive provides that the minors - unaccompanied or children of the applicants - will benefit from the same type of health care as that assured for the minor nationals of the host State; moreover, if a minor receives a necessary treatment, this last must continue also after the minor becomes adult.

An interesting provision in the new directive, non-existing in the older directive (despite that it would have had to figure also there), is that which states that in the case of the transfer of an applicant from the State in question in the responsible State for the examination of the application on its merits, the applicant will not benefit from the reception conditions, mentioned above, of the State in question, from the moment the transfer is notified to him<sup>21</sup>, excepting those imposed by the Union and international law (we can think that it is about the conditions which assure a decent life); moreover, the decision of transfer or a separate decision must mention this fact. In a precedent presentation we shown that the applicants who moves without permission from the State with which the application has been lodged in a second State, in the course of the procedure for the determination of the responsible State, loses the right to the reception conditions mentioned in the actual directives. Some scholars question this rule, arguing that is doubtful that it can serve as an incentive to prevent the secondary moves or to persuade the applicant to return to the first country (Tsourdi, De Bruycker, 2022: 47).

The material reception conditions may be reduced or, exceptionally withdrawn, by the host State, in certain circumstances which partially differ in the new directive in comparison with the previous. This possibility has been criticised by some scholars as being unacceptable, because it might lead to low levels for the standard of living of the applicants, below an adequate one prescribed by the directive itself (Vellutti, 2016: 203). Thus, in the previous directive the reduction or, exceptionally, withdrawal could be taken if an applicant abandoned his place of residence without informing the State or without permission (if it was the case), if he failed to comply with certain duties (as that to report, to inform or to appear for personal interviews), if he lodged a subsequent application after a decision on a previous application has been taken (although not specified, it is logical that the decision may not be but a rejection one), after a previous application was explicitly withdrawn by the applicant or, following its implicit withdrawal (which is defined in other European acts), the competent authority has rejected it, if the applicant did not lodge an application as soon as possible after entering the territory of the host State, if he concealed his material means and, so, unduly benefitted from the material conditions. It was also

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<sup>21</sup> This provision overturns the jurisprudence of the Court of Justice which, although pronounced under the Directive 2003/9, was valid also under the Directive 2013/33 and which decided that the conditions of reception apply to the applicant for asylum until the transfer is effected (see the Decision "Cimade and GISTI" 179/11 of 27 September 2012, on the site europa.eu).

possible to reinstall the grant of the material conditions in the first two cases, if the applicant was traced or voluntarily reported to the authorities and the disappearance was justified. Anyway, access to the health care and a dignified standard of living had to be assured<sup>22</sup>. In the second directive the reduction or the withdrawal refers in principle to the daily allowance; for the other material conditions, the withdrawal is possible only if the applicant behaves in a violent or threatening manner or breaches seriously or repeatedly the rules in the accommodation centres. The reduction or withdrawal of the daily allowance may intervene if: the applicant abandons the specific place of residence or the geographical area in which he has the right to move freely or he absconds; he does not cooperate with the authorities or does not comply with the procedural requirements imposed by them; he lodges a subsequent application as shown above; he concealed his material means and, so, unduly benefitted from the material conditions; he does not participate in the compulsory integration measures, excepting when this is not in his control. In the two first cases and in the last case, if the situation has ceased to exist, the material conditions may be reinstated, totally or partially. This directive provides, too, that the access to health care and a standard of living in accordance with the Union and international law is assured. In both directives the decision may be taken only individually (that is in regard only to the applicant in question, not also to his family), impartially and objectively, duly motivated, taking into account the particular situation of the applicant (especially if he has special needs) and the principle of proportionality. What is curious is the fact that in the previous directive the provision related to this aspect referred also to the possibility for the States to decide sanctions for the applicants who seriously breached the rules in the accommodation centres or acted in a violent manner, the decision having to respect the requirements mentioned above; or, this aspect has nothing to do with the problem of the reduction or withdrawal of the material conditions<sup>23</sup>. In exchange, the new directive, as we saw, integrates this aspect into the problem, the sanction being, thus, the withdrawal of the material conditions.

The decisions of granting<sup>24</sup>, withdrawal or reduction of the material benefits must be subjected to appeal or other similar remedy before a judicial authority, in fact and in law, and the States must ensure free legal assistance and representation by professionals, at least at the level necessary to assure effective access to justice (preparation of the appeal - added expressly by the new directive, but implicitly comprised in the old, in our opinion -, preparation of the procedural documents and participation in the hearing). The States may, however, restrict the free legal assistance to those who lack material means and, in the old directive, to special legal services, as well as in the cases in which the remedy has not tangible prospect of success<sup>25</sup>; the new directive adds in this last respect that the decision by which free legal assistance is refused on this ground by a non-judicial authority must be subjected to appeal itself, before a judicial authority, the applicant having the right to free legal assistance for this. They may provide that the treatment of the applicants are not more favourable than that of their nationals in matter of legal costs and fees. Also, they may ask for the reimbursement, totally or partially, of the cost of the legal assistance if the material situation of the applicants in question has improved or it is found out that they gave false information on their lack of means. The second directive specifies, moreover, that, if the access to free legal assistance is governed by the rules which are also applicable to domestic claims of

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<sup>22</sup> See also the Decision of the ECJ "Changu" 352/23 cit.

<sup>23</sup> Besides, the Court of Justice has stated that the sanctions could not consist in the reduction or the withdrawal of the material conditions if this fact deprived him of accommodation, food and clothing, putting the applicant in the situation not to cope with the most elementary needs (see the Decision "Minister of Internal Affairs/TO" 422/21 of 1 August 2022, on the site europa.eu; Decision "Haqbin" 233/2018 of 12 November 2019, on the site europa.eu). According to the second decision cited, if it is about an unaccompanied minor, the States must take also into account the best interest of the minor.

<sup>24</sup> We may wonder why a decision of granting of benefits could be attacked, because the applicant himself has not an interest to this! But then by who else?!

<sup>25</sup> The new directive adds, as a criterion of appreciation: "in particular when the appeal is at the second level or higher".



the same nature, these rules must not render this access impossible or excessively difficult (principle of effectivity).

Both directives deal with the problem of the applicants having special needs (or vulnerable, as the previous directive called them), dedicating to them a separate chapter. By applicants with special needs it is understood, in both normative acts: the minors (unaccompanied or children of the applicants), disabled people, elderly people, pregnant women, single parents with minor children, victims of human trafficking, persons with serious illnesses, persons with mental disorders, including post-traumatic stress disorders (added by the new directive), lesbian, gay, bisexual, trans and intersex persons (all added by the new directive), persons who have been subjected to torture, rape or other serious forms of psychological, physical or sexual violence, such as victims of female genital mutilation, victims of gender-based violence (added by the new directive), of child or forced marriage (added by the new directive) and the persons subjected to violence committed with a sexual, gender, racist or religious motive (added by the new directive). Some of these categories are dealt with separately. Both directives state that the States must assess the applicants, in order to find out these special needs, but the new directive imposes a certain time-limit after the lodging of the application, while the old said only "as soon as possible"; the new directive adds that this assessment is based on visible signs or on the statements of the applicant or of his parents or on his behaviour; of course, if the special needs become apparent at a later stage of the asylum procedure, they shall also be taken into account. Generally speaking, the applicants with special needs will receive adequate support throughout the duration of the procedure for asylum. The new directive adds that the assessment must be made by personnel trained with this aim.

For the minors accompanying adult applicants the best interest of the child is the rule in both directives (in fact, in all the Union acts), this implying aspects such as: the possibilities of the reunification with his family (if it is the case, we should add), his well-being and social development, security and safety considerations (related to the human trafficking, in particular), his views in accordance with his age and maturity. The States must assure the access to leisure activities and to open-air spaces, in the premises and accommodation centres, to rehabilitation services in some cases (abuse, neglect, exploitation, torture or cruel, inhuman and degrading treatment, armed conflicts), to mental health care and adequate counselling. Also, the States must assure that the minors<sup>26</sup> lodge with their families (parents, unmarried minor siblings or other adults responsible for them), if it is in their interest. The new directive adds that the persons working with minors, including those designated as minors' representatives for the asylum procedure<sup>27</sup>, should not have a record of child-related crimes or offences or of other offences which might lead to a doubt concerning their ability to work with the minors and must be trained with this aim.

For the unaccompanied minors the States must designate, within a certain time-limit in the new directive and as soon as possible in the old one, after the minors lodged an application, a person<sup>28</sup> who act as their representative, as we saw above; this person must have the necessary expertise and act in the interest of the minor; under the new directive it is possible also, if there are a disproportionate number of applications made by unaccompanied minors, that a person represents more minors and that the term-limit mentioned be prolonged. The minors must be placed with adult relatives, in a foster family, in accommodation centres with special provisions for minors or in other accommodation suitable for

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<sup>26</sup> Illogically, the new directive speaks about minor children of the applicants or the minor applicants (emphasis added by us), although a minor cannot be applicant himself but he is unaccompanied (otherwise he is comprised in the parents application). Or, if he is unaccompanied, by definition he has no parents and no adult responsible for him in the host State!

<sup>27</sup> Normally the minors who are children of the applicants should not have other representative than their parent(s), so we may wonder what this reference has to do in this provision!

<sup>28</sup> Who may be natural or legal. In the second case it must appoint a natural person to act effectively as representative.

minors; if the minors are 16 years old or above, they may be placed in accommodation centres for adults, if it is in their interest. The siblings must be kept together. The States must trace the adult family members, including abroad, in the country of origin of the minors, ensuring the confidentiality of the information if this could jeopardize the minor's or his family's life in the country of origin.

There is also, in both directives, a provision regarding the victims of torture and violence; even if the second directive is more detailed, essentially the provision is the same in the two normative acts. Thus, the applicants who have been subjected to torture, rape or violence of any kind (sexual, physical, psychical) and of any motive (sexual, gender, racist or religious) have the right to appropriate medical and psychological care, including, in the second directive, rehabilitation services and counselling. The personnel who works with those persons must be trained with this aim.

Both directives comprise a chapter dedicated to actions to improve the efficiency of the reception system, but we shall not deal with it.

The new directive states that some of its provisions must be implemented by the 21<sup>th</sup> of June 2026, leaving thus open the question as to which is the term-limit for the other provisions. According to the treaties the States must be given a time-limit for the implementation of a directive, this cannot be applied immediately. So, this is a curious provision. The former directive contained a similar one. Another curious provision in both directives is that referring to the respect of the time-limit for the implementation of the previous directive (that is the Directive 9/2003, respectively 33/2013). But these time-limits has already expired by the time a new directive has been adopted (2005 for the first, 2015 for the second)!

### **3. Conclusions**

The conditions of reception still vary significantly from one State to another, the result being an uneven access to the socio-economic rights of the applicants (Silga, 2018: 88). According to some scholars, the discrepancies between the States are not caused only by their economic and social differences, but also by the directives themselves<sup>29</sup>, which create more categories of asylum seekers<sup>30</sup>, contrary to their aim (Silga, 2018: 90 and 113), because they must take into account also the migration management objectives. The author cited above goes so far as to say that the underlying motive for this situation - the unequal treatment - is to discourage other migrants to come to Europe (Silga, 2018: 90 and 114).

According to an author (Bucur-Ioan, 2021: 140), the former directive constituted an important instrument for the reception of the asylum applicants, but whose efficiency depended also on the way in which the States applied and apply (because it is still in force) it. According to another author, although the new directive aims to a further move to standardize the rules applicable throughout the Union, because it is believed that the differences between the States are a strong incentive for the secondary moves of the applicants (in other words, their preferences for some States rather than for another), on one hand it is not sure that it succeeds and on the other hand this harmonization does not necessarily increase the standard, sometimes it lowers it (Peers, 2024: 40). However, under many aspects of content the new directive constitutes a progress in comparison with the former, even if the structural changes are not necessarily justified or do not lead to a better structure of the normative act. But the changes - substantive or structural - did not justify, in our opinion, the adoption of a new directive, because they could very well be integrated in the former directive through the means of amendments. The Union legislator proceeded in the same way when it adopted the Directive 33/2013, when the former Directive 9/2003 could very well be only modified. The justification for this course of action is that, if the changes

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<sup>29</sup> The reference was made to the Directive 33/2013, but it applies also to the new one.

<sup>30</sup> For example those who lodge a second application, those who are in detention etc.

are integrated in the existing act through amendments, the act loses its clarity and intelligibility, which is not true; the clarity depends of the structure of the act and of the wording of the provisions. On the contrary, too many normative acts succeeding one another create a dense and, so, rather unintelligible legislation.

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**IRINA ANA DROBOT<sup>1</sup>**

## **THE PRESENT MOMENT ENLIGHTENMENT AND THE IMPERFECTION OF LIFE IN VIRGINIA WOOLF'S WORKS: SIMILARITIES WITH ZEN BUDDHISM**

### **Abstract**

The purpose of the present paper is to analyse the way in which Virginia Woolf considers that the meaning of life and happiness lie in the present moment. We can notice how she deals with the transient nature of life in her works, in a similar way in which Japanese Zen Buddhism does. The present paper deals, among other examples, with the way in which Woolf considers in the essay *A Room of One's Own* that "The beauty of the world which is so soon to perish, has two edges, one of laughter, one of anguish, cutting the heart asunder," and the similarities with the Japanese wabi-sabi, referring to accepting the imperfections of life. It is striking how we can connect the two visions, of Virginia Woolf and of the Japanese Zen Buddhist philosophy, showing how Western and Eastern cultures may not, in fact, be that different. Woolf refers to moments of being, which are moments of revelation, or of enlightenment, and which have to do with everyday life, in a manner which is strikingly similar with the Zen Buddhist enlightenment.

**Keywords:** Moments of revelation, wabi-sabi, transience

**JEL Codes:** Z10, Z11, Z13

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### **Introduction**

Writers can present, in their works, various instances of experiences which are intuitive observations and reflections related to psychology and philosophy. The writers may not be aware of the theoretical knowledge, or, even if they are aware of it, they manage to present these notions by suggesting them in the feelings and thoughts of the characters. Writers rely, in such cases, strongly on their capacity for empathy, which is transferred to the characters they create. These characters will resonate with emotional and reflective experiences of the readers, since they are universal experiences present universally across human nature.

Philosophy is a larger part of our everyday lives than we may realize at first sight. When we speak about philosophy, we may think about it offering landmarks of dilemmas specific to human nature. Philosophy reflects human psychology, as we all have, at some point in our lives, concerns over what happiness (Lobel, 2017) is, whether it can be long-lasting or only lasting for some moments, or over the ephemerality of life (Heine, 2020) and of the world themselves. All these issues can be understood based on an interconnection of disciplines, of philosophy and psychology. We can find these reflections suggested by two quotations that are circulating on websites and on social media, and which belong to Virginia Woolf. This invites a netnographic approach, based on participant observation (Kulavuz-Onal, 2015), as the author of the present paper has been a witness to the sharing of quotations from Woolf analyzed in this paper. The very presence of these quotations in the online medium suggests that, through this medium, it is assumed that they will resonate with many users, who can identify similar experiences,

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feelings, and reflections in their own lives. Online social media and the online medium in general relies on immediate, instinctive, emotional reactions of the users when it comes to spreading certain ideas and sharing certain posts, or giving likes and comments. It is interesting to notice that online social media includes all domains of activity, not just entertainment, and that there can be a niche for each and everyone of us. It is also interesting how high culture can become appealing on social media, next to other instances of sensational news, fake AI-generated images of reality and interpretations of it, or fake facts, as well as entertainment in general. Woolf's work is, thus, made known or remembered based on reflections which can be relevant at all times. This can help fight against the prejudice that Woolf's works are boring, concerned with interior reality, not having the action and excitement expected from novels, and having nothing happen across plenty of pages. Woolf's works are presented, on the internet, from a fresh perspective, one that impacts readers by the help of technology. We can remember the practice of writing down passages and quotations from novels and other writings in our diaries or in various notebooks. These passages would be considered to be relevant to us, emotionally and based on the way we think about life and the world. Nowadays, such a function is taken over by online social media and popular Internet sites. The works of Virginia Woolf become less obscured, abstract, and more engaging. Users will become curious to read Woolf's works, since they realize that her works are not that much removed from their understanding. At the same time, based on quotations outside the initial context, readers may get the wrong idea about the meaning of these quotation. However, this is not the case with Woolf's selected quotations present in this paper. This is due to the fact that these quotations, taken away from the context, do not acquire a different meaning function of the present-day context of the readers. These quotations remain true to what they refer to at all times, as they do not rely on allusions and references to the present-day ideological, social, and cultural context. The quotations from Woolf are simply applicable to everyday life experience in general for any reader. The quotations rely on universal understandings and perceptions of the everyday life experience.

## Materials and Methods

One of the quotations proposed for analysis in this paper, from *A Room of One's Own*, circulating online is the following: "The beauty of the world which is so soon to perish, has two edges, one of laughter, one of anguish, cutting the heart asunder" (Woolf, 2014). Here we notice that the beauty is associated with ephemerality, with the idea that it cannot last for long. Further on, we are told about the changing moods, from laughter to anguish. Everything seems subject to change, from this example. Such an idea may lead knowledgeable readers, based on reader-response criticism (Mart, 2019), to rely on their background knowledge in order to draw parallels with this idea and Zen Buddhism (Suzuki, 1991). Other Asian culture philosophies rely on Taoism and I-Ching (Lui, 2005), which set forth the idea that change is a defining feature of this world and of our lives. I-Ching is the basis for Taoism, the first being an oracle which presents the persons consulting it with general tendencies for the future actions, as well as with warnings which need, however, to be deciphered.

The importance of the present moment is visible in the keywords of change and ephemerality. In addition, we can see how the next quote, from the novel *To the Lighthouse* by Woolf (1992), considered for analysis in the present paper completes and reinforces these ideas: "What is the meaning of life? That was all; a simple question — one that tended to close in on one with years. The great revelation had never come. The great revelation perhaps never did come. Instead, there were little daily miracles, illuminations, matches struck unexpectedly in the dark; here was one." The ephemeral is visible in the idea of "were little daily miracles, illuminations, matches struck unexpectedly in the dark" (Woolf, 1992). Happiness, meaning, and illumination become interconnected experiences. The reader-response approach (Mart, 2019) includes not only background knowledge based on which the readers can resonate with the text, seeing it as a familiar experience. They also rely on their emotional connection with the text, on their emotional reaction to it. In fact, interpretation of any text based on background knowledge

and emotional resonance with the text pave the way towards readers' finding in a text a familiar, relatable experience.

We can also relate the importance of the present moment from Zen Buddhism with the moments of being in Woolf's (1972) acceptance. The equivalence between the two concepts relies on the way in which we can notice the moments of being present in the quotation taken over from *To the Lighthouse*, based on which "there were little daily miracles, illuminations, matches struck unexpectedly in the dark; here was one" (Woolf, 1992). Indeed, her moments of being are the equivalent of moments of revelation, or of moments of enlightenment, present in the works of the British Romantic poets (Drobot, 2014; Gunes, 1999). What is more, these moments of being may rely on a high focus on the present moment, leading to an increased awareness of it, as well as of a high awareness of the interconnection of various aspects of this life, and, not to forget, to the perception of the world surrounding us being part of us, of our environments and ourselves being one, and, therefore, not separated. We can see the lack of separation between subject and object, between person and surroundings, in the experience of Septimus Warren Smith in Woolf's (1992) novel *Mrs Dalloway*, as he has a very strong, emotional relationship with the surrounding nature. He goes as far as to experience the sensation that he is one with his surroundings, or one with nature, resulting in moments of enlightenment, or revelation, which readers can understand as moments when the character feels at his ease, in a familiar environment, as well as when he experiences moments of well-being. At the same time, such moments bring momentary, or temporary, happiness.

We can relate as readers to the concept of ephemerality in philosophical thinking, which relies on the meaning in Greek of something lasting for only one day. The concept has been connected to the human condition. Both Rilke and Freud believed ephemerality could be understood as valuable (Razinsk, 2015). We can, indeed, relate the idea of valuable and ephemeral to the scarcity of a certain such aspect. This is what we find explained in Freud's (1915) work titled *On Transience*: "Transience value is scarcity value in time. Limitation in the possibility of an enjoyment raises the value of the enjoyment." This idea of transience is applied, in the quotations by Woolf, and implied, to be present in various moments which can be related to happiness. Happiness becomes, for Woolf, readers understand by suggestion, a transitory, ephemeral state, not a lasting, stable one.

According to Nail (2025), for Woolf, her philosophy, although she was a writer and was not associated officially with movements in philosophy, was a philosophy of what made her be a writer, which was related to her moments of being, or special, "exceptional moments." For Nail (2025), it was precisely the moments of being which made Woolf a philosopher, as based on these moments "Woolf gives us access to a world in motion and process; where all of nature and matter flows, ripples, and quivers." We notice here the parallels with the world as subjected to change, present in Asian cultures, based on Zen Buddhism, I-Ching and Taoism. Buddha claimed that "Change is a constant of this world" (Barlingay, 1977). We can also find the idea in Western philosophy, when Heraclitus claims that "The only constant in life is change" (Giesecke, 2015). Indeed, based on Woolf's moments of being we have access to changing impressions and perceptions about the world. The moments of being and the way they portray happiness as momentary are such examples of the world being in a continuous process of change,

Nail (2025) presents us with the idea of what Woolf meant by moments of being: "In these moments the anthropocentric division between humans and nature dissolves into metastable patterns-without essences or vital forces. Matter becomes dynamic, and what originally appeared solid is perceived as woven, porous, and fluid." We can notice in these cases how the usual perception is challenged.

Moments of being could be related to the idea of scarcity, meaning that such moments are rare, not only ephemeral. The transient nature of life makes the present moment all the more valuable as it does not last for long.

With respect to the quotation regarding the one selected from the essay *A Room of One's Own*, we can consider the way it relies on the concept of wabi-sabi in Japanese culture and philosophy (Juniper, 2011), which is related to the imperfection of life. Laughter and anguish, which are presented as the key concepts of life, and which are ephemeral, meaning that they can change in time, suggest such an approach. Laughter can be considered positive, while anguish can be considered negative, which elements, together, suggest an imperfect side to life. Anguish, especially, suggests imperfection, and all the more so as it is combined with laughter, a positive aspect of life. Laughter may be connected to happiness in life while, at the same time, laughter can be ironic, or we may laugh even in the face of negative happenings.

Based on Stoic Simple (2025), we can consider Asian cultures in relation to Western cultures in their proposal and acceptance of happiness. Stoicism (Sellars, 2014) as a school of philosophical thought believed that detachment from reality and its external events, together with self-control, could bring happiness. This can sound in line with the idea of Zen Buddhism that suffering is a part of life, that everything is ephemeral and we are going to lose everything, and that we need to accept this. In addition, based on the same conception of Zen Buddhism, Stoicism believed that we need to accept our fate, since everything happening in our lives is predetermined, or that there was a deterministic belief on the universe. In addition, living in a state of harmony with the World, or the universe, as well as with nature, was an ideal of Stoicism. Taoism tells us to adapt to the conditions and not to fight against them, as well as to wait for favourable conditions to succeed.

What we need to come to terms with in the case of Woolf's two quotations is the idea of change, together with the both negative and positive aspects of life, in the quotation from *A Room of One's Own* and the idea of life being composed of "little daily miracles," in the quotation from *To the Lighthouse*. We need to accept that this world is not perfect and, in addition, that everything positive, just like everything negative, is ephemeral. Change appears, in Woolf's reflections in these quotations, to be a main aspect of the world.

This idea can make sense to her readers, who are familiar with her works, as she is preoccupied with the idea of memory, the past, and the perception of time by her characters. In her works, she moves from past to present, connecting the changing identities of her characters. The very awareness of the distinction between past and present events, or past and present selves shows that the idea of change and ephemerality is central to the works by Woolf.

Readers of Woolf's works have, therefore, a complex and deeper perspective regarding what she means by ephemerality and the imperfection of the world, ideas which we find in the two quotations analysed in the present paper. Woolf relies, in her works, on the idea of interior world, of interior reality, of the characters. She relies on subjective experience, not on objective one, and this implies that meaning is not the one created by the conventions of the society, but by each and every individual. This is why subjective impressions are tied to the ideas of change, of ephemerality, since impressions can change at any time. In addition, impressions are not rational, but emotional, as they are a result of our interacting with the world. We can rely on the emotional reaction we all have to our surroundings at all times, according to environmental psychology, for further insights and explanations. Once Woolf gives rise to the subjective perspective of understanding the world, she gives way to a variable perspective, as our feelings can change in time and trigger a change in how we view the world. The passage from laughter to anguish (Woolf, 1992) suggests such an approach. The world becomes less stable, while all the more varied, as we see it through subjective perspectives and not through objective ones, built to remain stable in time, by society conventions. In this way, society could build up the idea that happiness means having a family and living in these conditions. Modernism (Mahaffey, 2007) starts challenging the traditional perspective on the world, starting with the idea of truth and objectivity, which, once challenged, paves the way to instability, and, therefore, ephemerality and change. Questioning the traditional state of

affairs, which suggests stability, based on the efforts to align with the conventional views of the individual leads to instability and to faster rates of change, suggesting ephemerality. The high degree of awareness of the presence of change and ephemerality on our lives is triggered by the way in which Modernism challenges the traditional view of the world. Questioning leads to states of change and ephemerality. Woolf presents change and ephemerality as the result of subjective perspectives on the world, as well as of challenging the traditional mindset, while Zen Buddhism relies on the idea of us coming to terms with change based on loss as a traditional worldview, and as an objective one, based on the suggestion that this is the universal truth about our world.

Since one of the features of the human being is self-reflection, we can relate the questioning mood of the age of Modernism, of which Woolf is one of the representative personalities, as a natural state of the human nature. Human beings could be understood as finding it hard to stick to traditional worldviews., which may ensure stability, but which are rigid, a rigidity which could be perceived as unnatural. Woolf arrives at the perceptions and ideas about the world and about life posed by Zen Buddhism, Taoism and I-Ching or Asian philosophies based on questioning what had previously been regarded as an unchanging and stable worldview. The Western world, therefore, had tried not to accept the idea that everything is ephemeral, subjected to change, and that eventually we were going to lose everything in this life. The loss can be related to the idea of change, as well as to the death of the loved person, and to the idea of no longer having certain possessions due to various reasons. The passage of time could be one such reason. Indeed, Woolf does deal with the idea of the passage of time in her works. Readers can recall the way in which, in the novel *To the Lighthouse*, the characters lose Mrs Ramsay and her presence which was related to her being the Angel in the House (Ruddick, 1977), a feminine, motherly figure which could bring emotional stability and harmony to the characters. At the same time, artist Lily Briscoe holds an ambiguous view of Mrs Ramsay, as Mrs Ramsay tries to do matchmaking for Lily, in order to make her get married. The idea of marriage is hard to accept for Lily, as it is hard to accept for a variety of characters in Woolf's works, such as Clarissa and Sally in the novel *Mrs Dalloway*, and, especially, Rachel Vinrace in the novel *The Voyage Out* (Woolf, 2018), whose death is attributed to her impossibility to escape marriage in the society of her time. Marriage is related, for these characters, to the idea of lack of personal freedom, and, ultimately, of giving up themselves, of who they are. In these cases, characters resist change, and find it hard to accept that their freedom is transient, or ephemeral. Characters such as Lily Briscoe change this, refusing to marry. Rachel also refuses, by symbolically dying in the end, even if the death was a coincident and an accident, as she catches a virus while on her trip. Clarissa and Sally adapt to the conditions, making readers recall Taoist philosophy. Woolf shows that change and ephemerality are issues we can find it hard to come to terms with. Asian culture philosophies propose a more detached perspective, while Western cultures mindsets believe that we should take action in order to change our lives and make them as we want. Asian cultures suggest that change is not always up to us and under our control. Western culture mindset is not at peace with one way of acting towards change and transience.

It is, after all, based on a psychological perspective, for us to feel resistance and anxiety towards change. One of the reasons is that not changing anything brings for us a familiar and secure sense of routine, and, by extension, of stability. Modernism as a mindset made us break free from stability. In addition, Modernism was associated with the break of stability and the chaos of the consequences of the war. The world was changing, and the questioning mood accompanied and reflected this change. It was a means of adapting to the external circumstances. The acceptance of change preached by Asian culture philosophies could be the equivalent of adaptation to the changes beyond our control. Woolf adapts to the Modernist mindset by changing the structure of the novels and of the chronological way of telling stories which was the only possibility until then. The changes she makes are not easily accepted by the readers, until our own times these days. Accepting change is, therefore, a difficult, long-lasting process. At the same time, accepting change is the only way to move on. What Freud described as the process of mourning can be related to a way of dealing with change and eventually accepting it. Mourning also



shows that suffering is, indeed, a large part of human nature and of life, and we have no other choice but to accept it. Zen Buddhism shows us that accepting that suffering, in connection to change and loss, is the only way to go on.

The Western and Asian cultures philosophies reflect the psychological struggles which are natural for human beings when dealing with the process of change, The passage of time can be one cause of this change and, after all, this theme is present to a high degree in Woolf's works.

Western and Eastern cultures reflect philosophical ideas which can help us deal with difficult moments in our lives. Their concerns are universal, and suggest that they are part of human nature and, therefore, unavoidable. Transience, or ephemerality, is, after all, a defining part of our own lives. It is also a part of the world around us, as we witness the people we love disappearing and also other aspects of the surrounding world.

As these are all universal concerns, the quotations chosen for sharing in the online medium from Woolf's works mentioned and analysed in this paper show that different cultures, through their philosophical, psychological, and religious systems, as the Asian systems of Zen Buddhism, Taoism and I-Ching can be perceived by Western culture members, can rely on explaining and putting forth the very essence of human nature. Different cultures, through their systems of thought and beliefs, express common concerns specific to human nature and psychology. These systems of thought and belief can help us control our reactions to change, ephemerality, loss, and suffering.

## Results

Woolf and her works have in common with Zen Buddhism the idea of the present moment when it comes to moment of illumination, revelation, of enlightenment, or moments of heightened awareness. These moments make us aware of the high intensity of focusing on the present moment/ It may sound surprising that we can see Woolf from this perspective, since she is associated usually with moments of contemplation of the past. Readers associate her with return to the pasts in her works and definitely not with the present moment. However, this paper allows readers to look at her work from an entirely different perspective, starting from the two quotations analyzed in this paper.

## Discussion and Conclusions

The moments of being are also moments of enlightenment, or revelation. These are moments when the focus is on the present moments and of a strong connection with and awareness of it. Related to the theme of the passage of time we can find, in the works of Woolf, the importance placed on the present moment. The focus on the present moment is also prompted by the feeling that the world around the characters is chaotic and makes no sense.

Woolf, with her moments of looking back into the past, and then returning back to the present moment, may confuse readers into making them think that she relies on the past more than on the present. This appears not to be the truth when we look at Woolf's work from the perspective of the present moment, which, surprisingly, is also there in her works. The moments of being, enlightenment, or revelation show this, while we can also identify the importance of the present moment in the two quotations analysed in this paper, from *A Room of One's Own* and *To the Lighthouse*. The present, as much as the past, is part of Woolf's concerns in her works. It may be part of a misunderstanding to ascribe Woolf to the past and concerns with the past, when in fact she is also concerned with the present, and this paper is a proof in this sense.

Woolf and her works are complex, and need to be considered as such. In addition, Woolf's works are not simply about disrupting conventions, shocking, and confusing the reader. They are also works speaking to the readers' inner concerns and supporting him or her in moments of difficulty. Philosophical reflections related to the importance of the present moment, once we are aware of ephemerality and change are such moments.

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## ANALYSIS OF OPERATING, FINANCIAL AND TOTAL LEVERAGE DEGREES OF INSURANCE COMPANIES TRADED IN BIST 100

### Abstract

This study presents the methodological framework of an ongoing research. The aim of this study is to determine the operating, financial and total leverage levels of insurance companies traded in BIST 100 and to examine the impact of the 6 February 2023 earthquakes in Turkey on the leverage levels of companies. In leverage analysis, three degrees of leverage are analysed. These are operating leverage (DOL), financial leverage (DFL) and total leverage (DTL). In this context, it is planned to analyze the DOL, DFL and DTL degrees of the companies by obtaining the financial statements of the insurance companies subject to the research for the period 2022-2023 from their official websites. In addition, it is planned to analyze whether the leverage levels of the companies differ according to the pre- and post-earthquake period with the difference test. It is estimated that the fact of earthquake will create an instinct to secure assets with the concern of similar losses and thus affect the demand for insurance policies. In this context, it is thought that the study will contribute to the literature in terms of measuring the effects of earthquake on the insurance sector.

**Keywords:** Operating leverage, financial leverage, total leverage, insurance companies, 6 February 2023 earthquakes

**JEL Codes:** G22, M10

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### 1. Introduction

One of the important actors of financial markets is the insurance sector. The insurance sector plays a critical role in risk management and economic stabilization. Therefore, the development of the insurance sector in Türkiye is important for investors in terms of providing confidence, and for the government in terms of covering economic losses in the face of natural disasters and alleviating the burden of the government.

Insurance is one of the leading sectors affected by all side effects that occur before and after the earthquake. The Marmara earthquake in Türkiye in 1999 caused 20 billion dollars of damage, of which only 1 billion dollars could be covered (Yiyin, 2022). Following the earthquake, Natural Disaster Insurance Institution was established in 2000. Natural Disaster Insurance Institution has made approximately 36 billion dollars in damage payments since its establishment until 2023, 96 percent of which was due to the February 6, 2023 earthquakes. The February 6 earthquakes caused \$104 billion in damage, of which Natural Disaster Insurance Institution covered \$35 billion (Bloomberght, 2025; AA, 2025). In a worse scenario, it is estimated that the cost of a possible Marmara earthquake for Türkiye will be 320 billion dollars (Ekonomim, 2025).

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Considering the past events and the possible damages that may occur in the future, the financial performance of the insurance sector in Turkey gains importance. In addition, the insurance sector creates resources for the financial sector by generating premium revenues and prevents losses that may occur in the national economy as a result of damage. Therefore, it is important to determine the financial performance of insurance companies in terms of evaluating the sector from a macro perspective and formulating policies (Elitaş et al., 2012). Considering all, this study is important in terms of investigating how the earthquake disaster can affect the financial structure of insurance companies. Moreover, by focusing on the post-earthquake period, the study aims to provide insights for decision makers, investors and policy makers on risk management strategies and the resilience of financial systems in the face of natural disasters.

The purpose of this study is to determine the operating, financial and total leverage levels of insurance companies traded in BIST 100 and to examine the impact of the earthquakes that occurred in Turkey on 6 February 2023 on these leverage levels. In this context, the second section summarizes the literature by reviewing previous studies on the subject. The third section includes a methodology section with formulas on how to analyze the leverage of companies. In the fourth and final section, the general evaluation of the study is made and the road map of the ongoing study is given.

## **2. Literature Review**

A review of the literature reveals that the financial performance of insurance companies traded in the BIST100 has been measured using different methods and techniques.

Erdoğan and Aydın (2024) analyzed the financial performance of insurance companies traded in BIST100 using CRITIC and MARCOS models. As a result of the study covering the 2019-2022 period, it was determined that the company with the best financial performance among the companies within the scope of the research was Anadolu Hayat Emeklilik, while the company with the worst performance was Agesa Sigorta.

Işıkçelik et al. (2023) analyzed the financial performance of life insurance companies in their study. In this study, the performances of life insurance companies between 2012 and 2021 were analyzed by financial ratio analysis. As a result of the analysis, it is determined that the capital adequacy performance of life insurance companies is good.

Akbulut and Aydoğan (2023) analyzed the financial performance of insurance companies operating in the Life/Pension branch for the period 2010-2021. As a result of the study, in which financial performances were analyzed according to SV, SAW and ARAS methods, it was determined that the best financial performance of the sector was in 2019 and the worst performance was in 2011.

Gülcemal et al. (2023) analyzed the financial performance of insurance companies traded in BIST100 using CRITIC and COCOSO methods. Ten ratios were selected to measure the financial performance of the companies between 2020 and 2021, and as a result of the analysis, it was determined that Türkiye Sigorta was the best in terms of financial performance in both years, while Ray Sigorta ranked last in terms of financial performance.

Önder and Kavak (2019) analyzed whether there is a relationship between corporate governance and financial performance of insurance companies traded in BIST100. The study covers the period between 2008 and 2017 and the return on equity ratio is used to measure financial performance. As a result of the analysis, it was determined that there is a significant relationship between corporate governance and financial performance of insurance companies.

Tayyar et al. (2018) analyzed the financial performance of four insurance companies in BIST by using the RIM method. As a result of the analysis conducted by covering the period between 2015-2017, it was determined that the company with the best financial performance was Ray Sigorta.

Bayramoğlu and Başarır (2016) comparatively analyzed the financial performance of insurance companies traded in BIST100. In the study, the financial statements of insurance companies between 2011-2014 were examined and their financial performances were analyzed using the TOPSIS method. As a result of the study, four insurance companies were found to be financially successful and two were found to be unsuccessful during the period covered.

There is no study in the literature that measures whether the financial performance of insurance companies differs according to the February 6, 2023 earthquakes. Therefore, it is thought that the study will contribute to the literature in this respect.

### 3. Methodology

Within the scope of the research, it is planned to use earnings before interest and tax, net income and net sales revenue data obtained from the financial statements of 6 insurance companies traded in BIST 100 for the year 2022-2023 to calculate leverage analysis. The financial statements of the insurance companies used for the analysis in the research are planned to be obtained from the official websites of the relevant companies. The 6 insurance companies and their codes are presented in Table 1 below.

**Table 1. Insurance Companies Covered by the Study**

<b>Code</b>	<b>Insurance Company</b>
ANSGR	ANADOLU SİGORTA
RAYSG	RAY SİGORTA
ANHYT	ANADOLU HAYAT EMEKLİLİK
AKGRT	AK SİGORTA
TURSG	TÜRKİYE SİGORTA
AGESA	AGESA HAYAT EMEKLİLİK

Source: Prepared by authors.

In leverage analysis, three degrees of leverage are calculated. These are operating leverage (DOL), financial leverage (DFL) and total leverage (DTL) (Beyazgül et al., 2022). Fixed costs are included in operating expenses. Therefore, it is possible to talk about the degree of operating leverage since fixed costs will be covered even if no production is made. Operating leverage relates fixed costs to variable costs to determine the extent to which fixed costs should be accepted. The main objective of operating leverage analysis is to determine the increase in profitability for increases in production beyond a certain level of production. It is possible to calculate the degree of DOL, which shows the percentage change in earnings before interest and taxes that would result from a 1% change in sales at a given sales level, as follows (Aydın et al., 2018).

$$DOL = \frac{\text{Percentage Change in Profit Before Interest and Taxes}}{\text{Percentage change in sales}}$$

Financial leverage (DFL) analyzes the relationship between net income and earnings before interest and taxes. Therefore, it shows what percentage change a 1% change in earnings before interest and taxes will cause on net income. The degree of financial leverage (DFL) can be calculated with the following formula (Beyazgül et al., 2022).

$$DFL = \frac{\text{Percentage Change in Net Profit}}{\text{Percentage Change in Profit Before Interest and Taxes}}$$

Total leverage (DTL) analyzes the effect of the change in the sales of an enterprise on the profitability of the enterprise. Total leverage can be calculated by multiplying the operating leverage by the financial leverage as shown in the formula below (Karadeniz, 2012).

$$DTL = \frac{\text{Percentage Change in Profit Before Interest and Taxes}}{\text{Percentage change in sales}} \times \frac{\text{Percentage Change in Net Profit}}{\text{Percentage Change in Profit Before Interest and Taxes}}$$

The DTL rating is composed of DOL and DFL ratings, and the higher it is, the higher the risk rating of the transactions. Businesses with high operating risk can reduce their risks by using less foreign resources in financing compared to businesses with low operating leverage. On the other hand, it is possible for enterprises with low operating leverage to increase their profitability by using more foreign resources in financing (Beyazgül et al., 2022).

#### 4. Conclusion

The purpose of the study is guided by the idea that the recent earthquake disaster will increase the interest in insurance in Türkiye, which in turn will affect the degree of leverage of companies. For this purpose, it is planned to calculate the DOL, DFL and DTL ratings of 6 insurance companies traded in BIST 100 for the years 2022-2023 and to interpret the performance of insurance companies comparatively. In addition, in order to determine the impact of the February 6, 2023 Kahramanmaraş earthquakes on the operating, financial and total leverage of insurance companies, it is planned to take the average of DOL, DFL and DTL degrees for the pre-earthquake period of 2022 and the post-earthquake period of 2023 and then investigate whether there is a statistically significant difference between these two periods in terms of leverage degrees.

The normality test is planned to be applied in order to decide whether the difference test will be performed with parametric or non-parametric method and the dependent samples t test or Wilcoxon Signed Rank test will be used according to the result of the normality test.

This study presents the methodological framework of an ongoing research. Findings and conclusions will be reported and recommendations will be developed with the analyses to be made in the following process.

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## MEDIATION ACTIVITIES IN LANGUAGE LEARNING: STUDENTS' PERSPECTIVES ON CHALLENGES AND OPPORTUNITIES OF USING WIKI SITES

### Abstract

The paper addresses the issues of deployment of wiki technology for mediation activities in English learning at university. The research design used a mixed methods methodology to explore students' perceptions quantitatively and qualitatively. The quantitative stage was aimed at investigating the degree of students' acceptance of Google wiki sites for language learning. It showed students' readiness and willingness to use wiki for studies. Wiki sites were reported to be easy to accept from students' perspectives. The findings informed a further design and actual deployment of the sites for different teaching purposes to teach mediation activities. In the study mediation was viewed through the lens of the Common European Framework of References for languages (the CEFR). Mediation activities were presented by three scales: mediating a text, mediating concepts, mediating communication. The research described three cycles of wiki deployment for different teaching purposes: academic English, general English and English for specific purposes. The author designed the tasks to be shared on the sites to involve students in mediation activities. The students were then interviewed about their experiences of using wiki sites for mediation activities. Overall, 25 students participated in semi structured interviews after the wiki deployment. The data was analyzed using thematic analysis which resulted in presenting three thematic maps that described mediation descriptors from each scale. The study findings revealed the advantage and disadvantages of using wiki for mediation activities. The main benefits are the following: free access to other works, ease of creating and editing content, flexibility and open nature of wiki sites. On the other hand, there are some barriers to consider, such as security issues, problems of synchronous editing, delays and misunderstanding as a result of asynchronous format of communication. In general, benefits outweighed the challenges. In addition, the study resulted in identifying the factors affecting wiki-mediated learning which include technological, psychological and educational aspects. The further research can be directed towards exploring the interplay between educational psychology and technology and deployment of wiki sites to train particular mediation activities taking into account the research findings.

**Keywords:** English teaching and learning, mediation activities, the CEFR, mixed methods approach, technology enhanced learning

**JEL Codes:** Z00, Z10

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### Introduction

The concept of mediation is not new for language learning. Mediation is viewed as a key skill for learning languages because it can happen in any context where people generate or process information. Being revised and updated in 2018, the Common European Framework of References for Languages (CEFR) describes new approaches with the focus on the mediation and interaction of learners as social

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agents (CEFR/CV 2018). As a multifaceted phenomenon, mediation is presented as the fourth mode of communication and a key factor in the language learning process. Mediation activities include mediation of texts, concepts, and communication with the illustrative descriptors for the teacher to choose from according to the relevance of the local context, learners' needs, and the required level of language proficiency. (CEFR/CV 2018). With the new updates to the CEFR, there arises a need to explore how language teaching and learning, which are guided by new strategies, can be mediated through technology. This research describes the deployment of a wiki site as a "learning platform" (Passey 2011) to enhance involvement of students in mediation activities.

## **Methodology and Methods**

The research used a mixed methods approach to explore students' perceptions of using wiki sites for mediation activities in language learning at university. Mixed methods research is the third paradigm in educational research which aims at describing and developing the tools that are closer to professional contexts (Johnson& Onwuegbuzie 2004). The paper describes an embedded mixed method design in which one data set (quantitative) provides a supportive role in the research which is based primarily on the other (qualitative) data set. At a quantitative stage TAM (Technology acceptance model) is used to measure students' acceptance of wiki technology for learning (Davis et al. 1989). This step served as a pre-intervention phase before designing the site and its deployment. The quantitative data analysis resulted in identifying a high level of acceptance of wiki technology among the students. Most students showed a high degree of agreement concerning the usefulness and ease of wiki sites for studies. The findings from the quantitative stage informed the actual deployment of the Google wiki sites for teaching the English language to 2nd year undergraduates at two Russian universities. Wiki sites were blended with traditional offline teaching and used as an additional platform for providing more tasks for mediation activities After the course completion, students were interviewed to gather qualitative data about mediation activities. The CEFR informed all the stages of the research process. It provided me with the theoretical underpinnings for the research: the concept of mediation and mediation activities with their illustrative descriptors and scales. It advocated to use an action research approach which "implies purposeful, collaborative tasks in the classroom, whose primary focus is not language." (CEFR, 2018, p.27). The idea of action research is "to bridge the gap" between new descriptors for mediation activities and practical application of teaching strategies using wiki sites (Somekh 1995, p.340). It was important for me to understand better how mediation activities can be designed and deployed using wiki sites and how they are perceived by students. Action research is cyclical by nature, including several stages of development. It develops through a spiral of cycles which include planning, implementing, observing and reflecting. The cycles start again considering the necessary changes to introduce at the next cycle (Kemmis & McTaggart 2007). Three cycles of wiki deployment were used in the study . Each cycle means creation of a new wiki site with the purpose of using mediation activities for different teaching aims and different aspects of the English language learning. The research site was based in two universities located in Russia: The Higher School of Economics (HSE) and Minin University of Nizhny Novgorod. With each cycle the site was changed by embedding more tasks for mediation activities for English learning. At the beginning of each cycle, the students were given clear instructions during class activities about the purpose of the site, the tasks to be done via wiki and the technical recommendations on how to get an access through a Google account. In some cases, I gave individual consultations if some students experienced uncertainty or problems with access, uploading or editing the materials. Mediation activities included the tasks to practice mediating text, concepts and communication. For example, working with video or in a writing groups was aimed at text mediation when students were expected to take notes or describe graphs. Such activities as designing a glossary or peer review of the essays were designed to train mediating concepts. The asynchronous nature of wiki learning and teaching did not allow to use many tasks for mediating communication which requires real communication in speech to solve disagreement or any misunderstanding.

### *The participants*

The participants in the study were students who studied economics, management, IT, art, and design. Overall, more than 100 students were involved in mediation activities via wiki sites over the period of academic years 2019-2020 and 2020-2021. The sample represents a rather homogeneous group of learners in terms of age, cultural background, and a study level. The main difference is the curriculum and the students' language proficiency. The students (number=42) were from three programmes: Management (number=13), IT (number=15) and Economics (number=14). They took part in a quantitative survey of the general acceptance of a wiki site and their perceptions before the intervention. After the deployment of the wiki site for mediation activities, the students from both universities were invited to take part in interviews to share their experiences. Some students were also invited to answer questionnaires in the final stages of the data gathering process. Participation was voluntary and those who agreed to take part signed a participation consent form. At the qualitative stage, a total of 25 students from both universities were recruited and interviewed.

### *Gathering and analysing qualitative data*

As the part of the mixed-methods approach, I conducted semi-structured interviews and questionnaires with a sample of the participants (N=25) who took part in the mediation activities on the wiki sites. This stage started with semi-structured, face-to face in-depth interviews which were conducted online. However, closer to the completion of the data-gathering process, semi-structured questionnaires with a reduced number of questions were sent to the participants of the third cycle of wiki deployment. Along with the data saturation gathered after the first and the second cycles, I modified the form of data collection, and the number of questions was reduced to be more focused on the mediation activities. Such an emergent design is a typical feature of the qualitative research process (Cresswell, 2014).

The students from the three cycles of wiki deployment were invited to participate in the study. They took part on a voluntarily basis when the exams were over to avoid any imbalance of power between me, acting as a teacher-researcher, and the students who agreed to participate in interviews; the period after the exam session was chosen deliberately to avoid any "power imbalance" between the data collector and the participants (Creswell, 2014, p.98). Overall, there were 14 active students from both universities, 7 students from the middle level of engagement and 4 students with a low level of participation. Such a varied pattern of participation in mediation activities helped avoid any bias towards the mediation activities and allowed data to be gathered about a wide range of experiences and perspectives.

The collected data was analysed thematic analysis which is considered to be a "foundational method for qualitative analysis" (Braun& Clarke, 2006). The aim was not only to identify themes that would unpack the meanings of students' experiences of mediation activities, but also to explore the findings from the quantitative stage related to students' general perceptions of the wiki deployment. The CEFR was used as a theoretical lens to view the data through the descriptors to unpack the meaning of the mediation activities. The collected data were categorised using three types of mediation activities: mediating text, concepts and communication.

The data set for mediation of text were quite voluminous: the table with the initial codes took 10 pages for all the descriptors. Overall, the largest number of codes (27) were identified for mediation of the text. They were grouped together under three overarching themes: visualization, convenience, and text production/reception. The greatest feedback was received about processing text and expressing personal response to creative texts.

The data for mediating concepts were centred around benefits and barriers for group activity. The greatest feedback was received concerning collaboration to construct meaning and facilitating collaborative interaction with peers. The least represented activity was encouraging conceptual talk because of the asynchronous format of the wiki site which does not afford direct talk about concepts. Overall, the participants mentioned convenience, an access to shared knowledge and the sense of community as the main advantages, whereas asynchronous format without direct discussion was reported to be a barrier to collaboration in a group.

Mediating communication is presented by three descriptors: facilitating pluricultural space; acting as an intermediary in informal situations; facilitating communication in delicate situations and disagreement. As stated in the CEFR, “mediating communication is primarily concerned with personal encounters, and so descriptor scales are only provided for spoken communicative activities” (CEFR, 2018, p.107). For this reason, the practical implementation of the tasks for mediating communication on the wiki site, which implies asynchronous communication, had certain limitations, which is why the data gathered to describe and unpack the meaning of each descriptor were quite scarce. The analysis resulted in the conclusion that the asynchronous format of wiki-mediated communication does not provide many opportunities for mediating communication. That is why the participant used other more flexible online channels for mediating communication: mainly messengers and social networking sites.

At the qualitative stage of the research the quantitative findings were analysed too. The quantitative stage resulted in the findings that needed more qualitative investigation. This analysis helped me identify the factors impeding or enhancing the deployment of wiki sites. These categories represent 4 factors that can impede or enhance students’ perceptions of wiki technology. Also, the data analysis showed the need to pay attention to the rationale and the appropriateness of the tasks designed for the wiki site so that the students could see their usefulness for the studies.

## **Discussion**

This paper describes the findings which resulted from the data analysis, mainly from the qualitative stage as the dominant one in the study. The findings from the quantitative stage played a supporting role in the research design to determine overall positive attitudes of students and their acceptance of wiki sites. The main findings of the quantitative stage were centred around the general acceptance of a wiki site for studying English. However, the factors contributing to the ease of use and the usefulness of the site needed further investigation at a qualitative stage. The analysis resulted in identifying four factors facilitating or impeding mediation activities via wiki: technological, motivational, educational and psychological. The technological and educational factors relate to cognitive mediation, whereas psychological and motivation concern relational mediation. These findings are in line with the previous research. As it is stated in the literature (Bolisani & Scarso, 2015), effective implementation and acceptance of wiki is not an automatic result, but it requires creating certain conditions and taking into account certain factors. The previous research enumerated the main factors that could enhance or impede wiki deployment (Jennex et al., 2007; Almeida&Rocha, 2011; Soto-Acosta et.al, 2014). Overall, the factors are grouped into five categories: technical, economic, operational, organizational, and cultural (Bolisani & Scarso, 2015). These factors were identified in relation to organizational wikis that were used in a small-sized enterprise as a knowledge management system. The recent research in this field expands these theoretical findings and points to the importance of taking into account design principles, operations of virtual community, and knowledge-sharing motivation and environment (Hung & Wang, 2020). Moreover, learners’ characteristics must be taken into account too. As for educational context, wiki is viewed as a “repository of knowledge and for building communities of practice” (Grace, 2009, p. 66). Being a structured wiki, Google Sites offers benefits of sharing and collaborating between peers and educators. However, the successful integration is also underpinned by certain factors: technical

affordances and limitations of the system, teachers' experience and motivation, and pedagogical approaches (Coutinho, 2009).

This study resulted in identifying the constraints that arise from students' context. It is necessary to be aware of psychological barriers that learners can experience when studying via wiki: lack of security, reservations for collaboration, fears related to self-expression, privacy, and peer criticism. These findings are supported by the latest research in the context of higher education (Halim & Halim, 2024). On the other hand, respondents reported that they experienced the growth of confidence as the result of using wiki sites. The findings show that it was underpinned by the feeling of more independence and the opportunity to learn from others and build ties. It can be explained by the features of wiki technology with its less hierarchical structure and constructivist nature of knowledge generation (Ruth & Houghton, 2009). The analysis of students' experiences showed that despite technological constraints and fears, the respondents mentioned a strengthening of confidence due to establishing connections through peer review, sharing materials, and collaborative learning. For some students it was really like "a Learning society" in which "everybody has immediate access to whatever source of information one needs or desires" (Salomon & Almog, p. 235, 1998). Belonging to a community was one of the sub themes under the motivational factor which included intrinsic and extrinsic motivation. The findings of the research show that motivation plays an important role in students' experience. Extrinsic motivation is presented by the concept of community which is viewed as an external factor influencing overall perceptions of learners. Student engagement based on interest and community feeling is categorized as an intrinsic type of motivation. The recent research in this field demonstrates an enhanced interest and improved engagement of students when learning via Google sites (Luo & Chea, 2020; Halim & Halim, 2024). Overall, students perceived wiki sites for mediation activities as a positive experience that resulted in various learning outcomes. The analysis helped identify factors that could enhance or impede students' activity via wiki: these factors are interconnected and should do not be considered separately. The teacher's role is of primary importance because wiki-mediated learning is different in many ways from traditional classroom teaching. The main challenge is asynchronous way of wiki enhanced learning and teaching. The findings of the research prove that mediating communication was not successfully implemented in a wiki due to asynchronous wiki way of learning. Despite these limitations, there were some cases of disagreement and delicate stations among peers when doing peer review, contributing to discussion spaces or clarifying the task. In this case respondents preferred to use other channels of communication. It can be explained by the need of students for face-to face real communication. It is supported by the research showing that students need real contact (Salomon & Almog, 1998). Furthermore, the previous research proved that for communication students prefer other messengers (Zorko 2009; Ruth & Houghton, 2009). It is explained by the fact that these technologies have become an essential part students' lives because they enable immediate communication. Respondents reported that they preferred other synchronous ways of communication (social networking sites, messengers, face to face contacts, chats) to negotiate and discuss any disagreement. As it is explained in the previous research, asynchronous wiki communication is not effective to exchange messages instantly (Lund, 2008). These limitations to direct collaboration via wiki is said to pose difficulties for collective production (Li, 2012). Despite some limitations, wiki mediated learning environments are well combined with other forms of computer-assisted communication (Cubric, 2011), so it can be used as an element of blended learning.

This study shows that Google sites can create a "creative classroom set up" which offers visual learning materials and more interaction among students- teachers (Du Plessis, 2011, p. 28). The research findings prove the idea of effective integration of wiki into the process of learning the English language given the condition that wiki affordances and limitations are taken into account when designing the site and the tasks for mediation activities. Understanding wiki strengths and weaknesses can help educators develop effective technologically informed design to support teaching practices. Wiki sites can be incorporated in a blended model of learning which embraces traditional offline classes and multimedia

rich wiki space which can be even easily combined with the state of the art technologies like AI (for example, for image generating or writing). The findings contradict the belief that Web 2.0 technologies conflict with “rigidly organized social structure of formal education” (Zhang, 2009, p. 276). The students’ feedback was positive towards wiki integration into English learning process due to ease of use, convenience, usefulness of the tasks for studies. Also, the students did not see much difference between wiki way of learning and traditional practices. Moreover, the respondents reported more advantages that they can benefit from. However, wiki sites cannot substitute traditional classes but they can be deployed additionally to train text and concept mediation skills.

## Conclusion

This section presents some conclusions that can be drawn from the findings. The respondents provided rich descriptions of the wiki-mediated environments that were designed for mediation activities. The quantitative findings of the ease of use and convenience of wiki sites were confirmed and explored further to identify affordances and limitations of these sites. Overall, the findings point to favourable perceptions by students when working on the wiki sites. Wiki sites can be effectively used for all the skills that are required for overall mediation, such as collaborating with people from different backgrounds, creating a positive space by providing support, comparing answers or providing ideas. The sites proved to be effective for generating ideas and co-constructing meaning in collaborative activities when mediating texts and concepts.

Most students reported that wiki-mediated learning for mediation activities was a new experience for them. It differed from traditional classroom activities in many ways: asynchronous format, focus on collaborative activities, editing functions, and access to others’ works. However, the respondents reported many challenges and limitations of this type of learning. The main difficulties related to fears of editing, the time-consuming nature of the asynchronous format, and login and security issues. Despite these disadvantages, the respondents shared favourable perceptions, especially of text and concept mediation activities. The mixed methods approach deployed in the research enabled me to identify the factors that teachers can consider when deploying wiki sites in everyday teaching practices in the context of technology enhanced learning.

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**TURHAN CETIN<sup>1</sup>**

## **DEVELOPING AN ACTIVITY FOR DISASTER EDUCATION IN FOURTH GRADE SOCIAL STUDIES COURSE**

### **Abstract**

Education is the most fundamental element that enables people to live in harmony with others and the environment. The problems in any field in the world are based on wrong practices in education. This study aims to increase awareness of the concept of disaster among fourth-grade middle school students. Turkey is located in a place where natural disasters are frequently experienced due to its natural structure and geographical location. Surviving natural disasters with minimum damage can be ensured by providing disaster education effectively at all levels starting from the pre-school period and continuing with adult education. Disaster education can be given in all courses at the secondary school level. While the subject of disaster is being taught in the social studies course within the framework of the integrated curriculum, the simultaneous teaching of disaster subjects in visual arts, music, Turkish, science, physical education and sports, mathematics, foreign language, information technologies and religious culture and ethics courses will make a significant contribution to the comprehension of the subject of disaster. In this study, sample activities were developed to ensure students' active participation and permanent learning of the acquisitions related to disaster education in the social studies course.

**Keywords:** Disaster, disaster education, social studies, activity development

**JEL Codes:** I20, I21, I28, I29

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### **1. Introduction**

Disasters are defined as natural, human and technological events that cause physical, social or economic losses in all or a large part of the society, adversely affect or interrupt human activities, and the coping capacity of the affected society is not sufficient (AFAD, 2024). The United Nations Office for Risk Reduction (UNISDR, 2016) also defines a disaster as: "events that cause human, material or environmental losses and impacts that are beyond the capacity of society to cope with its own means, causing disruptions in the continuity of life".

In addition to preparing training programs against disasters, it is also important to ensure that these trainings are effective and permanent and to measure them. Disaster training is a crisis management and it can only be ensured through these drills that individuals know how to act in case they face these disasters. If it is not learned through experience, all efforts will be wasted in case disaster related trainings cannot be applied in case of crisis.

The purpose of disaster training is to ensure that every unit of the society that may be involved in the disaster before, during and after the disaster has the necessary correct information and can use this information in the best way at the right time.

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When Turkey's geographical features, topographical structure, geological location and climate characteristics are analyzed, it is seen that natural disasters are frequently experienced. Therefore, disaster education and disaster awareness should be provided to all citizens of the society. Through disaster education, individuals become aware of the risks before they are exposed to any natural disaster. The individual learns the structure, effects and causes of the hazard and gains knowledge and skills to reduce the damage of disasters and prevent disasters. Individuals who receive disaster training effectively learn how to respond to disasters, how to protect themselves from disasters and how to recover quickly after disasters. Thanks to disaster training, cooperation between people and institutions in society increases. In schools, it is very important to make disaster education continuous with earthquake and fire drills, drills, presentations and seminars held in disaster institutions to develop disaster awareness in students. If we conduct drills periodically and in accordance with the rules, we can gain the expected behaviors during a disaster in society.

### **1.1. Disaster Education in Social Studies Course**

Nelson Mandela defined education as "The most powerful weapon you can use to change the world is education". The effect of education in the process of acquiring the right behavior in every field of life is known. Unconscious behaviors are the most effective factor in still being inadequate in the face of disasters and in the loss of many lives and property during and after disasters.

Although the constructivist education approach is adopted, the concepts are not fully acquired by the students and are forgotten in a short time. Disaster education should be given to our children, who are the continuation of the next generation, not only in terms of knowledge but also in terms of skills. This is possible by applying different teaching methods and techniques inside and outside the classroom, ensuring permanence in teaching and raising individuals who know what to do when disasters occur.

When the 2024 Social Studies Curriculum is examined, it is seen that the learning areas of "Our Home is the World" in the 4th and 5th grades and the units of "Living Together" in the 6th and 7th grades include learning outcomes related to disaster education. By including activities appropriate to the acquisitions in these learning areas, students will gain disaster awareness, and their active participation in the learning process will contribute to their permanent learning (Karakuş & Önger, 2017).

## **2. Method**

This study is an activity development study for disaster education within social studies education. The activity was prepared specifically for the acquisitions related to disaster within the scope of the unit "Our Home is the World" at the 4th-grade level of primary school.

### 3. Findings

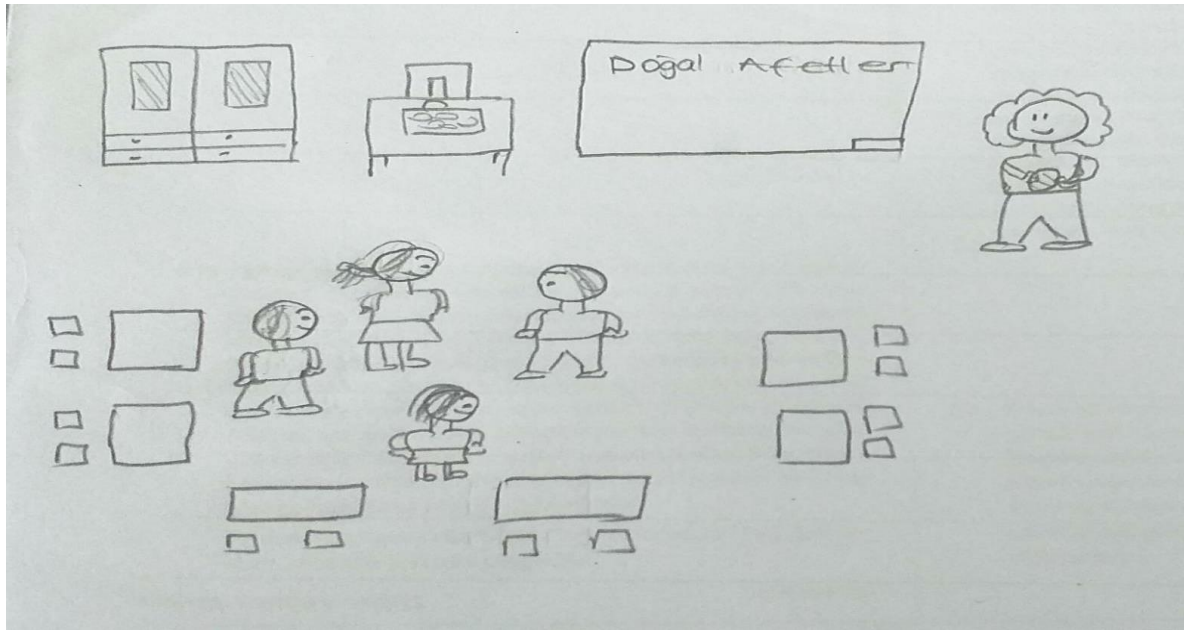
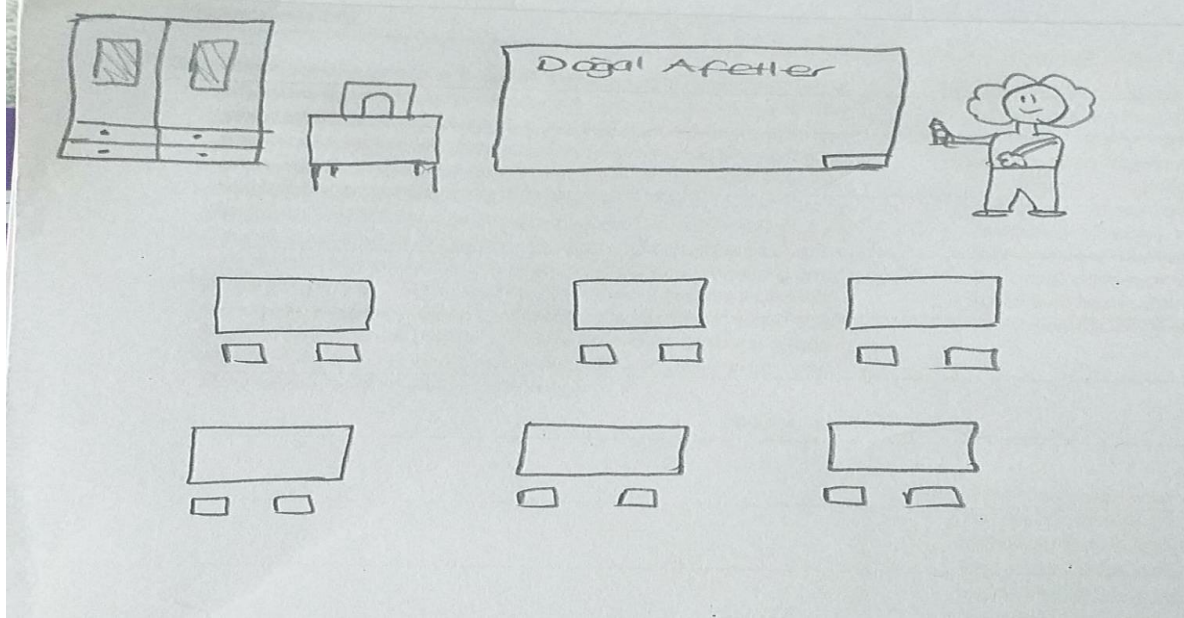
#### 3.1. Activity 1: Whose Ball Game

**Table 1. Plan of the Activity Named Whose Ball Game**

<b>Event Name</b> Whose Ball Game	<b>Keywords:</b> Natural disasters, flood, earthquake, landslide, avalanche, erosion, prevention	
<b>Course:</b> Social Studies	<b>Short Description of the Activity:</b> What are the materials that should be in the disaster kit? The teacher asks the question and throws the ball in the air. The student who catches the ball in turn first asks the question and then throws the ball into the air by asking a different question related to the disaster topic. The activity ends with each student participating in the activity.	
<b>Grade 4</b>	<b>Duration</b>	<b>40 minutes</b>
<b>Learning area/Unit</b>	PEOPLE, PLACES AND ENVIRONMENTS	
<b>Achievement(s)</b>	4.3.6. Makes necessary preparations for natural disasters.	
<b>Field Specific Skill(s)</b>	Observation, environmental literacy	
<b>Competency(s)</b>	Communication in mother tongue, Social and citizenship competencies	
<b>Value(s)</b>	Sensitivity to the natural environment, cooperation	
<b>Methods/techniques</b>	Question and Answer Technique	
<b>Teaching materials</b>	Ball	
<b>Processing/process</b> <ul style="list-style-type: none"><li>➤ In two class hours, the topic is first covered in detail.</li><li>➤ At the end of the lesson, students are asked to briefly review the lesson.</li><li>➤ At the beginning of the next lesson, the first thing to do is to use the question-and-answer technique to help students recall prior knowledge.</li><li>➤ The rows in the classroom are arranged in a U-shape.</li><li>➤ The game is explained to the students before moving on to the "Whose Ball Game.</li><li>➤ First, the teacher asks "Which materials should be put in a natural disaster kit?" He throws the ball up by asking the question.</li><li>➤ The student who catches the ball answers the question and throws the ball in the air by asking a different question.</li><li>➤ The activity ends with the participation of all students.</li><li>➤ After a brief review of the topic, the lesson ends.</li></ul>		
<b>Warnings and Suggestions:</b> Necessary precautions should be taken in advance against accidents that may occur in the classroom.		
<b>Alternative Implementation of the Activity:</b> Precautions to be taken and preparations to be made for disasters can be written on the board by drawing a mind map.		
<b>Measurement and Evaluation:</b> Give examples of natural disasters in our country. What precautions should be taken before, during and after natural disasters? What are the materials that should be in the disaster kit?		

Source: Prepared by author.

Table 1. (b). Draft Drawing of the Event



Source: Prepared by author.

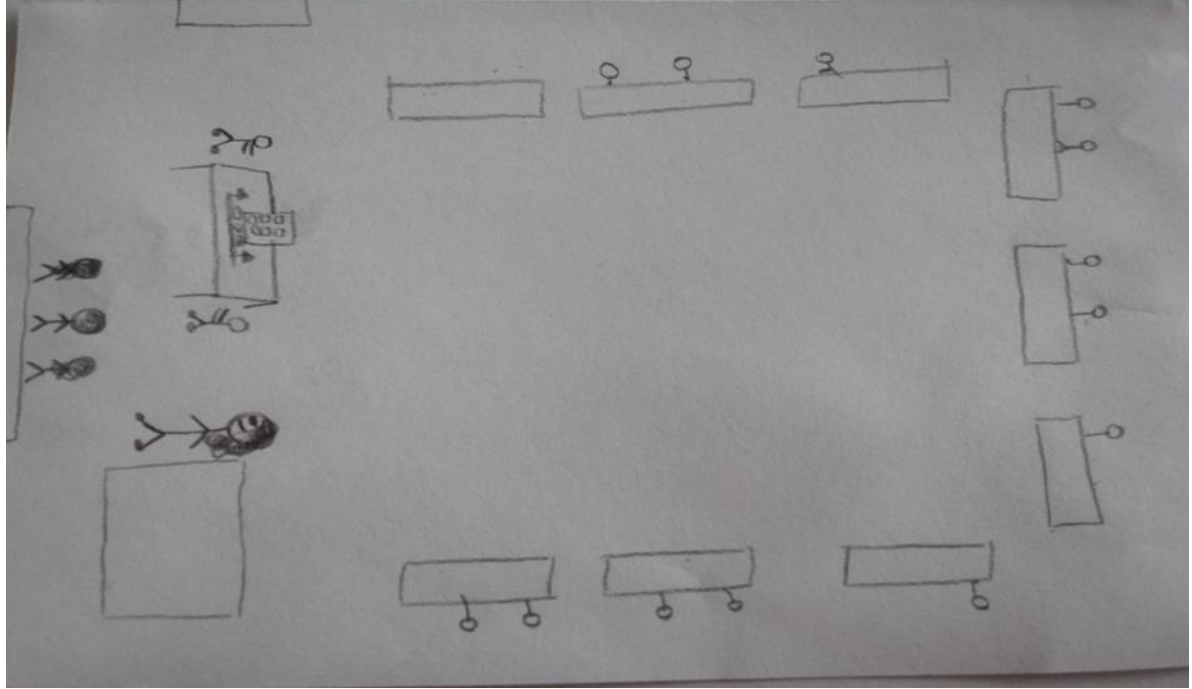
### 3.2. Activity 2: Disaster Prevention Designs

**Table 2. The Plan of the Activity Named Disaster Prevention Designs**

<b>Event Name:</b> Disaster Prevention Designs	<b>Keywords:</b> Disaster awareness, design, sensitivity	
<b>Course:</b> Social Studies	<b>Short Description of the Event</b> Students are asked to produce an activity related to disasters within the scope of the educational and social activity proposal around the student.	
<b>Grade 4</b>	<b>Duration</b>	<b>40 minutes</b>
<b>Learning area/Unit</b>	Active Citizenship	
<b>Achievement(s)</b>	4.6.3 Recommends educational and social activities that are deemed necessary in school life.	
<b>Field Specific Skill(s)</b>	Research, Social inclusion	
<b>Competency(s)</b>	Communication in mother tongue, competencies related to social and active citizenship	
<b>Value(s)</b>	Sensitivity to the natural environment, Freedom	
<b>Methods/techniques</b>	Brainstorming, Question and answer	
<b>Teaching materials</b>	Paper, Pen	
<b>Processing/process</b> <ul style="list-style-type: none"><li>➤ Explanations are made to the student about the subject.</li><li>➤ Necessary reminders are made about the disaster lesson previously taught.</li><li>➤ What would you like to do to prevent disasters to arouse curiosity in students? Which disaster would you like to prevent?</li><li>➤ The class of 20 students is divided into groups of 5 students each and homework is assigned.</li><li>➤ They are asked to come to the next class with a model they have designed about producing solutions to disasters and briefly present their models.</li><li>➤ After the model presentations, they are asked to write about what they have learned about this subject.</li></ul>		
<b>Warnings and Recommendations</b> Necessary precautions must be taken against any danger.		
<b>Alternative Implementation of the Activity</b> If models cannot be prepared, a common model can be prepared in the classroom with the materials brought by the teacher.		
<b>Measurement and Evaluation</b> Students talk about their feelings after the activity.		

Source: Prepared by author.

**Table 2. (b). Draft Drawing of the Event**



Source: Prepared by author.

#### 4. Conclusion and Recommendations

Disaster education is one of the necessary training to raise awareness for people to take necessary precautions as conscious citizens before, during and after disasters. Due to the frequent occurrence of various disasters in our country, it is necessary to provide disaster education at an early age. Disaster education can be given informally as well as in schools and its importance can be emphasized through lessons in the educational environment. When disaster education is considered based on lessons, it is given predominantly in the Life Sciences course at the primary education level and in the Social Studies course at the secondary education level compared to other courses. However, when the Social Studies Curriculum is examined, it is seen that disaster education is not given enough importance. The most appropriate course in which disaster education can be taught is Social Studies.

When the curriculum is examined, we see that the subject of disaster is not given at every level of education. Outcome 1 is given in 4th grade and 2 outcomes are given in 5th grade. For example, although the outcome "4.6.3. Suggests social activities that are deemed necessary in school life" given in Grade 4 is not directly given under the name of disaster education, a sample activity was prepared to take students to places such as museums as educational and social activities or to make models by associating them with disaster education to gain values and skills such as responsibility and cooperation. The name of the activity is Disaster Preventive Designs. With this activity, students are reminded of previous topics and it is emphasized once again that every active citizen should be aware of disaster.

When 6th, 7th and 8th grade Social Studies course achievements are examined, it is seen that the subject of disaster education is not emphasized. At these levels, history and geography subjects were mainly included. However, since a spiral structure is adopted in geography lessons as in the 4th and 5th grades,

we think that it should be briefly mentioned to raise awareness about the disaster. Reminding the students throughout their education life and emphasizing the precautions to be taken and how they should behave in disasters they will face is important in terms of increasing the number of conscious citizens in the country.

In the 2018 Social Studies Curriculum, it is emphasized to be given by the constructivist teaching approach. It is desired to ensure the realization of permanent learning by ensuring the active participation of the student in the process. As in the teaching of other subjects, disaster education should be taught by reinforcing it with activities. The teacher should guide the student in this process and the student should learn by questioning, thinking critically and analyzing.

The first activity developed in disaster education is the "Whose Ball?" game. With this activity, students will learn many different questions about the subject such as what disasters are, what kind of preparations they should make against disasters and the answers they can give to these questions together with their friends. Involving students in the process will ensure permanence in teaching.

In the last activity, students were asked to suggest educational and social activities in the field of active citizenship learning. Our "Disaster Preventive Designs" activity, was aimed to have students design a model that would enable them to be conscious citizen.

If students know that although disasters cannot be prevented, loss of life and property can be minimized by taking precautions and if they learn how to take precautions for this, this activity will be a repetition of the subject intertwined with a different unit by using the spiral structure of the curriculum on the subject of disasters, which is rarely included in the social studies curriculum.

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**RUZITA AZMI<sup>1</sup> AND NORAZIAH ABU BAKAR<sup>2</sup>**

**LEGAL VIABILITY AND STAKEHOLDER PERSPECTIVES ON THE PRIVATE LEASE SCHEME (PLS) IN MALAYSIA'S HOUSING SECTOR**

**Abstract**

The Private Lease Scheme (PLS) offers an alternative to traditional property ownership by providing purchasers with a 99-year leasehold interest instead of full ownership. This study explores the legal viability of the PLS within Malaysia's existing property laws, including the National Land Code (NLC) 1965 and Housing Development (Control and Licensing) Act (HDA) 1966. The problem statement addresses concerns regarding the compatibility of the PLS with the current legal framework and the potential risks it poses to purchasers, who may be unaware of the distinctions between leasehold and ownership. The research objectives are to evaluate the compatibility of the PLS with existing laws, assess the perceptions of key stakeholders including policymakers, lawyers, and developers and identify the legal reforms required to integrate the PLS into the market. The methodology employs a qualitative approach, using semi-structured interviews with stakeholders such as policymakers from the Department of the Director General of Lands and Mines (DGLM), the Ministry of Housing and Local Government (KPKT), conveyancing lawyers, and property developers. These interviews were analyzed to gather insights into the legal, financial, and practical implications of the PLS. The findings reveal significant challenges in the implementation of the PLS, including its incompatibility with existing laws, the potential for buyer confusion, and concerns about the depreciation of property value over time. Legal professionals and policymakers emphasized the need for statutory reforms to provide clearer guidelines on the rights of lessees, lease renewal conditions, and protections for purchasers. Developers acknowledged the market potential for the PLS in niche sectors, such as retirement housing, but raised concerns about the broader market's acceptance due to the perceived financial risks. The study concludes that while the PLS offers potential flexibility for certain market segments, comprehensive legal reforms and buyer education are critical to its successful integration into Malaysia's housing market.

**Keywords:** Private Lease Scheme, legal viability, qualitative approach, legal reform

**JEL Codes:** O10, O20, O30, O40

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**1. Introduction**

This research delves into the perspectives of key stakeholders involved in the implementation of the Private Lease Scheme (PLS) in Malaysia's residential property market. Through interviews with policymakers, lawyers, and developers, it explores whether the existing legal framework is compatible with the PLS and assesses its potential impact on both purchasers and developers. A focal point of the study is to analyze how the PLS, as a contemporary model for property transactions, aligns with Malaysian land and housing laws, and to determine whether legal amendments are necessary to legitimize the scheme fully.

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## **2. Problem Statement**

The Malaysian housing market has traditionally relied on the sale of properties with ownership rights transferred to purchasers. However, the introduction of the PLS presents a novel alternative, where a 99-year lease is transferred instead of full ownership. This raises significant concerns about the compatibility of PLS with existing legal frameworks, such as the National Land Code (NLC) 1965, Housing Development (Control and Licensing) Act (HDA) 1966, and Strata Titles Act (STA) 1985. The ambiguity surrounding legal protections for purchasers and the potential exploitation of the scheme by developers have sparked debate. This research aims to address whether the current legal infrastructure adequately supports PLS and safeguards the rights of purchasers.

## **3. Research Objective**

The primary objective of this study is to evaluate the legal feasibility and implications of introducing the PLS in Malaysia. Specifically, the research seeks to:

1. Assess the compatibility of the existing legal framework with the PLS, focusing on key laws such as the NLC, HDA, and STA.
2. Investigate the perspectives of relevant stakeholders, including policymakers, legal professionals, and developers, on the PLS's potential risks and benefits.
3. Examine whether legal amendments are required to ensure the effective and fair implementation of the PLS, protecting the interests of purchasers.

## **4. Methodology**

The research employs a qualitative approach, using semi-structured interviews with a range of stakeholders in the Malaysian housing sector. The main forms of qualitative research include field observation, content analysis, group studies and in-depth interviews, which basically involve data in the form of words, descriptions or narratives.<sup>3</sup> Interview is a widely used method of information collection. It is a process of conversation in which the interviewer asks questions with the purpose of obtaining information and the respondent's answers. The information may be of a personal nature concerning the respondent or it may be regarding any problem or matter in which the interviewer is interested. In most cases, the respondent is one of many people from whom the interviewer seeks information. Interview as a technique of information collection is frequently used in research, whether the research subject is of a general theoretical nature or involves some social or legal problem, issue or question.<sup>4</sup> A semi-structured interview is a method of research used in the social sciences and qualitative research.<sup>5</sup> While a structured interview has a rigorous set of questions which does not allow one to divert, a semi-structured interview is open, allowing new ideas be brought up during the interview as a result of what the interviewee says. During the interview, particularly the semi-structured interview, one gets to talk to people to find out what they have experienced and what they think and feel about that are interested in.<sup>6</sup> For this study, semi-structured interviews will be conducted with individuals and experts in identified relevant agencies, departments and organizations to form expert opinions in the field.

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<sup>3</sup> Anwarul Yaqin. (2008). Legal Research and Writing Methods. Lexis Nexis Butterworth

<sup>4</sup> Ibid

<sup>5</sup> Miles, J. & Gilbert, P. (2005) A Handbook of Research Methods for Clinical and Health Psychology. Oxford University Press.

<sup>6</sup> Ibid

The interviews conducted were with various stakeholders including:

- i. Policymakers from the Department of the Director General of Lands and Mines (DGLM) and the Ministry of Housing and Local Government (KPKT), responsible for shaping land and housing policies.
- ii. Lawyers experienced in conveyancing and land transactions, providing insights into the legal intricacies of the PLS.
- iii. Developers licensed in West Malaysia, offering perspectives on the practical implementation of the scheme.
- iv. The National House Buyers Association of Malaysia (NHBAM), representing the interests of purchasers.

**Table 4.1. (a). The Descriptions of the Respondents/Stakeholders**

<b>No</b>	<b>The Respondents</b>	<b>Descriptions</b>
<b>Respondent 1</b>	Deputy Director	DGLM
<b>Respondent 2</b>	Director	DGLM
<b>Respondent 3</b>	Legal Advisor	DGLM
<b>Respondent 4</b>	Deputy Director (Strata)	DGLM
<b>Respondent 5</b>	Officer (Policy & Governance)	DGLM
<b>Respondent 6</b>	Deputy Head of Senior Secretary (Housing Planning Division)	KPKT
<b>Respondent 7</b>	Deputy Senior Secretary (Housing Planning Division)	KPKT
<b>Respondent 8</b>	Legal Advisor	KPKT
<b>Respondent 9</b>	Legal Officer	KPKT
<b>Respondent 10</b>	Conveyancing Lawyer	Partner Firm-10 years Experience-10 years
<b>Respondent 11</b>	Conveyancing Lawyer	Partner Firm-10 years Experience-10 years

Source: Prepared by authors.

**Table 4.1. (b). The Descriptions of the Respondents/Stakeholders**

<b>Respondent 12</b>	Conveyancing Lawyer	Partner Firm-33 years Experience-33 years
<b>Respondent 13</b>	Conveyancing Lawyer	Partner Firm-10 years Experience-10 years
<b>Respondent 14</b>	Conveyancing Lawyer	Legal Associate Firm-15 years Experience-15 years
<b>Respondent 15</b>	Conveyancing Lawyer	Partner Firm-5 years Experience-5 years
<b>Respondent 16</b>	Director	Developer
<b>Respondent 17</b>	Director	Developer
<b>Respondent 18</b>	Director	Developer
<b>Respondent 19</b>	Secretary-General	National House Buy Association of Malays

Source: Prepared by authors.

The data collected from the interviews were analyzed to identify recurring themes and insights regarding the legal and practical challenges posed by the PLS. By comparing these insights with existing legal frameworks, the study aims to provide recommendations for improving the regulatory environment for PLS. This combination of legal analysis and empirical research will contribute to a deeper understanding of how the PLS can be integrated into Malaysia's housing market while safeguarding the rights of purchasers.

## Discussion

### 1. Legal Compatibility and Stakeholder Concerns

PLS presents several challenges when viewed in the context of Malaysia's current legal landscape. Policymakers from the Department of the Director General of Lands and Mines (DGLM) and the Ministry of Housing and Local Government (KPKT) highlighted the PLS's incompatibility with the National Land Code (NLC), which governs land dealings in the country. Although the NLC allows for the transfer of leases, the nature of the PLS—which offers a 99-year lease instead of ownership—introduces new complexities. For instance, the NLC is structured around registered ownership, and while leases are recognized, they do not grant the lessee the same rights and protections as an owner. This gap in the legal framework can leave lessees under the PLS exposed, particularly in terms of property rights at the end of the lease period. Without the legal certainty of ownership, purchasers may face long-term insecurity, especially if lease renewal terms are unclear or unfavorable.

All the respondents from the policymakers noted on the non-compatibility of the PLS with the existing legal framework, that may cause the whole sale transaction to become illegal. Respondent 1 cautioned that the result of a transfer of a lease under the PLS is prejudicial to the status of the purchasers because they only become the registered interest holder and will have to surrender the property at the end of the lease period:

*“The term private lease projects a different meaning that leads people away from the provisions within the National Land Code (Revised 2020) [Act 828]. Subsection 214(1)(c) provides the enabling for a lease to be transferred but with a limitation in subsection 214(3) which states that no lease can be transferred to more than 2 persons unless it is in the form of a trust or representatives. Act 828 provides the basis for a lease transfer, but it does not provide complete land ownership. At the end of the lease period, the lessee must surrender the lease to the proprietor.”*

Moreover, policymakers acknowledged that the NLC’s provisions on leasehold interests do not align with the PLS’s objectives. The Housing Development Act (HDA), which governs the sale of housing by developers, also lacks the necessary provisions to support the sale of long-term leases under the PLS. As a result, developers are unable to fully implement the PLS under the existing regulatory framework. The policymakers further emphasized that legal amendments are needed to ensure that PLS transactions can be carried out in a manner that protects all parties involved, particularly the purchasers, who may not be fully aware of the risks associated with leasing a property as opposed to owning it.

Respondent 6 observed that the PLS does not conform to the existing NLC. However, to allow the developer to offer the concept of PLS, the law should be amended for PLS to be implemented in Malaysia. As far as PLS is concerned, Respondent 6 expressed her view:

*“In my opinion it could be better if there is other source of law that allows PLS to be implemented in Malaysia. Not only the existing National Land Code (NLC) ...surely it can...when it involves home buyers, property ownership either through ownership or leasing, should have a new source of law.”*

From a legal standpoint, lawyers participating in the study expressed concern about the potential for buyer confusion. Under the PLS, purchasers may believe they are securing full ownership, when in reality, they are acquiring a long-term lease. Lawyers emphasized the importance of clarity and transparency in PLS transactions, noting that if developers fail to properly disclose the differences between ownership and leasing, it could lead to legal disputes.

Relating to the selling of a lease under the PLS instead of transfer of a title, Respondent 10 opined that the purchasers should be given the freedom to decide:

*“As long as the public is aware of what they are buying, there is no reason to ban PLS schemes. The scheme itself is legal and within the confines of the NLC. We just have to ensure that buyers are fully aware that they are buying private leases that may or may not be extended. Let the open market decide whether or not PLS schemes can take off.”*

Additionally, lawyers suggested that to avoid such disputes, new statutory provisions should be introduced, specifically addressing the rights of lessees under the PLS. These provisions should include protections for purchasers, such as guaranteed renewal options for the lease and clear guidelines on the responsibilities of both the lessee and the developer throughout the lease period. The absence of such legal clarity not only puts purchasers at risk but also leaves developers exposed to potential litigation if buyers feel they were misled.

## 2. Market Viability from the Developers' Perspective

From the perspective of developers, the PLS presents an opportunity to diversify housing offerings. Developers recognized that there is a niche market for long-term leasing, particularly among retirees and individuals who do not require full ownership. These buyers may prioritize flexibility and lower upfront costs over the security of ownership, making the PLS an attractive option for them. In particular, projects such as retirement villages or properties built on waqf land (endowment land) could benefit from the PLS model. Developers noted that in these cases, buyers may be more interested in securing a place to live for a certain period without the need for long-term ownership, especially if the maintenance and upkeep of the property are handled by the lessor.

An interesting suggestion is posed by Respondent 17 where the concept of PLS is more compatible with community living:

*"In my opinion, this private lease scheme can be made if it does not involve strata development such as, for example, retirement houses or on waqf land. However, a comprehensive study needs to be carried out before it can be implemented"*

However, developers also raised concerns about the broader market appeal of the PLS. In Malaysia, where homeownership is traditionally seen as a symbol of financial stability and security, the PLS may struggle to attract buyers who prioritize long-term investment in property. One significant issue highlighted by developers is the depreciation of property value under the PLS. Unlike ownership, where property values typically appreciate over time, the value of a leasehold property under the PLS will decrease as the lease period draws to an end. Purchasers who acquire properties under the PLS may find that they are unable to sell the property at a profit in the future, particularly if the lease is nearing expiration. This depreciation factor could deter buyers who view property as a long-term investment or as a means of generating wealth for future generations.

Moreover, developers were concerned about the legal uncertainty surrounding the PLS. Without clear guidelines on lease renewal or the transferability of the leasehold interest, the PLS may not be viewed as a stable or reliable option by potential buyers. Developers suggested that for the PLS to succeed, comprehensive legal reforms are needed to provide clear and enforceable protections for both buyers and sellers. They also stressed the importance of educating buyers about the PLS and ensuring that all marketing materials and contracts clearly state that the property is being sold as a leasehold, not as a freehold. Transparency in the sales process is essential to maintaining trust between developers and purchasers.

## 3. The Role of Legal Reforms in Protecting Purchasers

The National House Buyers Association of Malaysia voiced strong concerns about the potential for the PLS to exploit unsuspecting buyers. The association argued that without adequate legal safeguards, purchasers could be misled into believing they are acquiring ownership when they are, in fact, only securing a lease. This confusion is compounded by the fact that many buyers in Malaysia are unfamiliar with the leasehold model, particularly in the context of private residential property. The association called for strict legal provisions to ensure that buyers are fully informed about the nature of the PLS, including the depreciation of the property value and the conditions for lease renewal.

Furthermore, the association highlighted the financial risks associated with the PLS. Purchasers who acquire properties under the scheme may find that they are left with a property that has little or no resale value towards the end of the lease period. Without the security of ownership, these buyers could face difficulties in securing financing or selling the property if they need to move or downsize. The

association stressed that legal reforms are essential to protect buyers from these risks. Specifically, they called for the introduction of new statutory instruments that would provide greater transparency in PLS transactions and ensure that purchasers are aware of the financial implications of buying a leasehold property.

Respondent 19 stressed that the PLS is open to duping unsuspecting purchasers into thinking they will own the purchased property. The only thing the 'purchasers' purchased was the right to occupy. At the end of the lease period, the owner has the absolute discretion and power to remove the 'purchaser' or increase the 'rental'.

*“... I have already paid 'rental' for the duration of the lease, let's say 30 years. By agreeing to pay more money on top of the rental I have paid, the property may be priced less than a conventional sale, but I am not paying less money. I am paying twice. Does that mean I now have to take on another bank loan to pay for the 'purchase'? After the lease expires, most buyers are already in their twilight years. The buyer who is supposed to enjoy the home now has to take on another term loan to continue to enjoy the house. Does the buyer have any rights to sub-sale? The developer has undoubtedly fooled me if I were to fall for this scam. It means that I have tied myself to another 20/30 years to pay off the purchase price or 'lease rent'.”*

The legal reforms suggested by the association included the establishment of minimum lease terms, clear renewal conditions, and standardized contracts that would provide buyers with detailed information about their rights and obligations under the PLS. They also recommended that the Housing Development Act (HDA) be amended to include provisions specifically for PLS transactions, ensuring that developers are held accountable for providing clear and accurate information to buyers. Without these reforms, the association warned that the PLS could lead to widespread buyer dissatisfaction and potential legal challenges from purchasers who feel they were misled.

#### 4. Challenges in Implementing the PLS

Despite the potential benefits of the PLS, its implementation faces several challenges. One of the key issues is the depreciation of property value as the lease term progresses. This poses a significant challenge for purchasers who may not be fully aware of how the value of their property will decrease over time. In a country where property is often seen as a form of long-term financial investment, this characteristic of the PLS could make it less attractive to buyers, particularly those who are unfamiliar with leasehold arrangements. Additionally, without clear lease renewal terms, buyers may face uncertainty towards the end of the lease period, leading to anxiety about their future living arrangements and potential financial burdens if they are required to renegotiate their lease or move out.

Another major challenge is buyer education. Many potential purchasers in Malaysia may not fully understand the differences between owning a property and leasing one under the PLS. Without proper education and transparent marketing, there is a risk that buyers could be misled or confused about what they are purchasing. Developers, policymakers, and legal professionals all emphasized the importance of clear communication in PLS transactions. Marketing materials, sales contracts, and lease agreements must explicitly state that the property is being sold as a leasehold and not as a freehold. Buyers must also be informed about the potential financial risks associated with leasing a property, particularly the possibility of the property losing value as the lease period progresses.



As stated by Respondent 6 and 7:

*“Any agreements under PLS house must be documented, in such document it must be spell out clearly the house is bought from the developer and the developer leases the house as the lessor. The land belongs to the landowner. It must be included in the agreement that it is for leasing, every single cent paid for leasing not for ownership... Possibly the leasing agreement or contract to be incorporated in NLC? Or Housing Development (Control and Licensing) Act 1966 (HDA)? Or the new Act? We never know. That it would help in this situation.”*

*“We predict most probably in the near future if transaction under PLS is not being done properly can cause another problem. The problem arises after 30 years, after 60 years, the children claim ‘my parents bought the house, ownership with my parents, I know they have withdrawn certain amount of money, every month they paid certain amount of money and even paid the maintenance fees, without the children knowing that it is actually leasing.”*

*“Even with the advertising...the permit for advertising sale, now under Act 118 Housing Development (Control & Licensing) Act 1966 ...if want to chip in under Act 118 and there is PLS it is included in the sales permit approval. If it is a PLS so it must be mentioned clearly.”*

## Findings

The findings from the interviews reveal a consensus among stakeholders that, while the Private Lease Scheme (PLS) could offer flexibility to buyers, the current legal framework does not fully accommodate its implementation. Several key points emerged from the discussions:

1. **Legal Compatibility:** Policymakers from the DGLM and KPKT highlighted that the PLS is not fully compatible with the National Land Code (NLC) and existing housing laws. The provisions related to leasehold interests do not adequately address the specific nature of PLS transactions. As a result, amendments to the NLC, HDA, and other related laws are necessary to legitimize PLS.
2. **Perceptions of the PLS by Lawyers:** The majority of conveyancing lawyers noted that transparency is essential when selling housing under the PLS. Lawyers emphasized that purchasers must be fully informed about the differences between ownership and leasehold transactions. Without this clarity, the scheme may lead to legal disputes, particularly regarding the misrepresentation of property rights.
3. **Developers' Concerns:** Developers recognized that the PLS could offer a viable alternative for buyers who do not require full ownership, such as retirees or individuals seeking temporary housing. However, they also expressed concerns about the attractiveness of PLS to Malaysian buyers, particularly due to the depreciation of property value toward the end of the lease period. Some suggested that PLS may be more suitable for specialized housing, such as retirement villages or waqf lands, rather than conventional residential developments.
4. **Purchasers' Interests:** The National House Buyers Association was highly critical of the PLS, arguing that it could lead to significant financial losses for purchasers, who may mistakenly believe they are gaining ownership when, in fact, they are only securing a lease. They also expressed concerns about the long-term value of properties sold under the PLS and the potential for developers to take advantage of buyers' lack of understanding of leasehold arrangements.

5. Need for Legal Reforms: Across the interviews, there was a strong consensus that legal reforms are needed to support the PLS. Policymakers, lawyers, and developers all agreed that a dedicated legal framework should be introduced to govern PLS transactions, ensuring that purchasers are protected and fully informed of their rights. Without such reforms, the implementation of PLS may expose buyers to unnecessary risks and legal complications.

### Key Themes and Areas for Legal Reform

The study identified several recurring themes across stakeholder interviews:

1. Incompatibility with Existing Laws: Both policymakers and legal professionals agree that the PLS is not fully compatible with current property laws, particularly the NLC. Reforms are needed to integrate the PLS into the existing legal framework while ensuring that purchasers' rights are protected.
2. Need for Transparency and Buyer Protection: There is a consensus that transparency is critical in PLS transactions. Buyers must be fully informed about the differences between purchasing a leasehold interest and acquiring full ownership. Clear contractual provisions and standardized agreements are necessary to avoid potential legal disputes.
3. Market Viability and Niche Targeting: Developers view the PLS as viable, but only if targeted towards specific markets, such as retirees or those looking for short-term housing solutions. The general market may not respond positively due to concerns over property depreciation and long-term value.
4. Financial Risks and Long-Term Security: The National House Buyers Association raised serious concerns about the financial risks and long-term security of purchasers under the PLS. They argued that without significant legal protections, the PLS could disproportionately benefit developers at the expense of buyers.

It is important to note that since last year it was reported that PLS in Johor has led to significant legal and financial challenges for Singaporean investors. Many buyers mistakenly believed they were acquiring conventional leasehold properties but later discovered they were only long-term lessees without full ownership rights. This misunderstanding has resulted in legal disputes, with over 170 affected buyers forming a collective to address grievances, and at least 80 pursuing legal action against developers for alleged misrepresentation.<sup>7</sup>

Several legal suits have been filed against developers, with claims that misleading sales tactics and inadequate disclosure of leasehold conditions resulted in financial losses for buyers. Some lawsuits argue that developers marketed PLS properties as traditional leaseholds without clarifying the restrictions on ownership, resale, and rental. Courts are currently reviewing these cases, and legal experts suggest that outcomes may set important precedents for future PLS transactions involving foreign investors.<sup>8</sup> Financially, PLS properties present challenges due to depreciation and restricted marketability, as developers impose resale limitations. This structure complicates buyers' ability to liquidate their investments, further reducing property value over time.<sup>9</sup> The controversies surrounding PLS underscore the need for greater transparency and regulatory oversight. Singaporean investors

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<sup>7</sup> Channel News Asia (2024, Dec 24), Singaporean buyers in legal dispute with Malaysian developer over ownership of Johor condo purchases: CNA.

<sup>8</sup> Malay Mail, (2024, Dec 25). Singaporeans in legal dispute over Johor condo purchases: Malay Mail.

<sup>9</sup> Mothership, (2024, Dec 26) S'poreans unhappy Johor condo they bought confers them 99-year lease status, not ownership: Mothership SG.

should conduct thorough due diligence, seek independent legal counsel, and fully understand the implications before entering into PLS agreements.

## **Conclusion**

PLS represents an innovative approach to property transactions in Malaysia, offering a flexible alternative to traditional ownership models. However, its success depends heavily on the implementation of comprehensive legal reforms and clear buyer protections. The study highlights the need for amendments to the National Land Code (NLC), Housing Development Act (HDA), and other relevant laws to ensure that PLS transactions are transparent and fair. Without these reforms, purchasers may be exposed to significant financial risks, and developers may face challenges in marketing PLS properties to a skeptical public.

Furthermore, buyer education will be critical to the success of the PLS. Developers and policymakers must work together to ensure that buyers fully understand the implications of purchasing a leasehold property, including the potential for property value depreciation and the conditions for lease renewal. With the right legal framework and sufficient education, the PLS could offer a valuable alternative to traditional property ownership, particularly for buyers who prioritize flexibility and lower upfront costs over long-term ownership. The recent controversies surrounding PLS in Johor underscore the need for greater transparency and regulatory oversight. Not only limited to Singaporean investors but to all investors should conduct thorough due diligence, seek independent legal counsel, and fully understand the implications before entering into PLS agreements.

**Figure 1. Analysis of Summary Findings**



Source: Prepared by authors.

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**TAMER BUDAK<sup>1</sup> AND SERKAN BENK<sup>2</sup>**

## **HEALTH TOURISM IN ECONOMIC AND FISCAL ASPECTS: THREATS AND OPPORTUNITIES FOR TÜRKİYE**

### **Abstract**

Due to the global pandemic in 2020, 435,691 health tourists preferred Turkey to receive health services. In this context, revenues of 1.37 billion USD were obtained in 2020. In 2024, a total of 1,506,442 people came to Turkey to receive health services and purchased health services worth 3.02 billion USD. In terms of health tourism, Turkey aims to increase the contribution of this sector to GDP by standing out with low-cost but high-quality health services (e.g. aesthetic surgery, cardiology, oncology). Health tourism has a strategic role in the economy by increasing its share in tourism revenues. When Turkey's basic opportunities in health are considered, Turkey's position as a bridge between Europe, the Middle East and Asia, and its support for health tourism, when combined with its four-season tourism infrastructure, constitute its geographical advantages. In addition, treatment costs in Türkiye are significantly lower than in the EU and other countries, and the fact that JCI-accredited hospitals guarantee quality is a significant advantage. Despite the opportunities, increasing competition, lack of promotion and bureaucratic obstacles can be listed as threats. In this context, countries such as India, Thailand and Mexico entering the market with similar strategies may threaten Türkiye's market share. However, the inadequacy of international marketing efforts of health facilities limits the awareness of potential patients. In addition, the complexity of visa processes and insurance partnerships for health tourists may slow down the flow of patients. It can be stated that significant taxes and incentives are given for health tourism in Turkey. An example of this situation is the VAT exemption. Health tourism services provided to foreign patients by health institutions with an International Health Tourism Authorisation Certificate are exempt from VAT. In addition, health institutions with a health tourism authorisation certificate are granted an 80% discount on net income/corporate profit during the taxation phase due to the income obtained within the scope of the services they provide to foreign patients. As a result, Turkey has the potential to become a global centre in health tourism. To achieve this, increasing promotional activities, simplifying legal regulations, and developing and diversifying marketing strategies are of critical importance.

**Keywords:** Health tourism, economic growth, tax policies, international competition

**JEL Codes:** L83, O10, H25, F60

Budak, T. & Benk, S. (2025). Health Tourism in Economic and Fiscal Aspects: Threats and Opportunities for Türkiye. In Conference Proceedings: Full Paper Series of MIRDEC 24th – Istanbul 2025 International Academic Conference on Economics, Business and Contemporary Discussions in Social Science, pp. (86-96). 24-25 April 2025. Istanbul, Türkiye. <https://www.mirdec.com/istanbul2025proceedings>.

### **1. Introduction**

Health tourism has become a strategic sector not only for Türkiye but also for other countries, generating significant economic revenues and financial contributions to the health sector, while facing challenges in resource allocation, equity, and regulation. This paper aims to show the development of the health tourism sector from 2010 to 2024. The analysis shows significant contributions to Türkiye's economy related to health/medical tourism, with the sector contributing \$10 billion to the Turkish economy, and

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patient arrivals have increased at a compound annual growth rate of 18.2% since 2010 as of 2023 (WTTC, 2024)

Health tourism consists of medical services (e.g., surgery, and dentistry) and wellness based activities (e.g., thermal spas), which patients seek from international clients. The primary reason for Türkiye's growing health tourism potential is its limited financial resources. This situation is causing patients to travel to Türkiye from countries like the USA, where health care costs can be extremely high, especially for those with little or no insurance. Indeed, while heart bypass surgery in the USA can cost \$123,000, in Türkiye it costs about \$13,900. Similarly, knee replacement surgery is \$10,400 in Türkiye, while it is about \$14,000 in the USA. In other words, there is a 10 times cost difference (Ward, 2024). In 2019, 756,926 patients from Türkiye take medical services within the health tourism. During this period, the income obtained from health tourism was 1,459,132,000 \$, while in 2024, a total of 1,506,442 people came to Türkiye to obtain health services and the total income take in 2024 was 3,022,957,000 \$(USHAS, 2025).

This paper also tries to assess the economic impacts (GDP, employment, export revenues), fiscal effects (tax contributions, public investment), threats (inequities, regulatory gaps), and opportunities (digital health, market diversification).

## **2. Historical Perspective of Health Tourism**

Health tourism represents a dynamic intersection of global health systems and international tourism industries that has evolved from age-old practices to a multidisciplinary economic phenomenon. The aging of the world's population, rising healthcare costs, and increasing consumer awareness of healthy living) have brought this sector to a significant level across disciplines (Connell, 2006; Hall, 2011). In contemporary definitions, health tourism is defined as purposeful travel to maintain, enhance, or restore physical, mental, or spiritual well-being through medical interventions, wellness activities, or therapeutic natural resources (Mueller & Kaufmann, 2001).

Generally health tourism can be grouped as medical tourism (travel for surgical/clinical interventions), health tourism (preventive health promotion) and spa/thermal tourism (therapeutic resource-based treatments) (Smith & Puczkó 2014). When looking at the typological evolution and development of health tourism, it is noteworthy that the most important factor in this regard is changing consumer demands and the diversification of the industry. While therapeutic thermal tourism was at the forefront in the early periods of health tourism, modern medical interventions and personalized treatment methods came to the fore in the later periods. In this context, the development of health tourism can be divided into three basic periods. These periods are pre-1990, 1990-2010 and 2010-present period.

In its early stages, health tourism was characterized by therapeutic thermal tourism, which primarily appealed to individuals seeking natural healing resources. However, with the increase in people's demands, the advancement of medical practices, the development of communication technologies, and the global accessibility of health services, modern medical interventions and personalized treatment approaches have come to the fore (Hall, 2011).

In this context, the historical development of health tourism can be divided into three separate periods. The first period, before 1990, was largely characterized by traditional therapeutic-based spa-intensive treatments. The second period, from 1990 to 2010, saw increased therapeutic travel driven by advances in technology, increased international mobility, and the affordability of cross-border medical treatments. The third and most recent period, from 2010 to the present, is characterized by the integration of specialized medical procedures, digital health solutions, and patient-centred care models for

personalized healthcare (Connell, 2006; Smith & Puczkó, 2014). Table 1 below illustrates the eras of the health tourism as a basic concept.

**Table 1. Conceptual Evolution of Health Tourism Typologies**

Era	Dominant Paradigm	Key Characteristics
Pre-1990s	Therapeutic model	Focus on disease treatment through natural resources
1990-2010	Marketisation model	Growth of private healthcare providers, medicalization of services
2010-Present	Wellness continuum	Integration of medical, wellness and lifestyle services

Source: (Connell, 2006; Smith & Puczkó, 2014).

As it is shown that there are three eras in health tourism historically. Pre-1990 is named the therapeutic model, whereas 1990-2010 is called the marketisation model, and 2010-present is termed the wellness continuum.

Health tourism has evolved into a strategic national sector in over 50 countries worldwide. Historically, medical travel was characterised by patients from developing nations seeking advanced treatments in developed countries. However, contemporary trends indicate a reverse flow, with individuals from developed nations increasingly travelling to developing countries for affordable, high-quality healthcare services (Avsar, 2024).

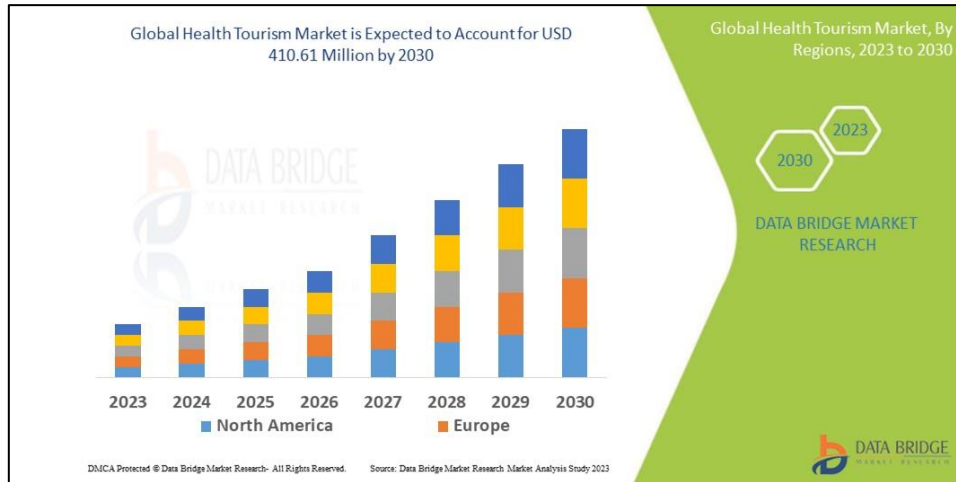
### 3. Economic Dimension of Global Health Tourism

The global health tourism market will reach a size of 3 trillion US Dollars in 2025 and will grow by 25% annually. This growth is driven by technological advances (robotic surgery, telemedicine), low-cost treatments and increased patient mobility. According to another statistical data, it is estimated that 13% of people traveling for health in 2025 will be older and people between the ages of 18-34 will travel to another country at least 2 to 3 times a year for different treatments (Yıldırım, 2016).

Health tourism is characterized as the travel of patients to another border in the hope of receiving healthcare services, and while health tourism generated \$102.6 billion globally in 2019, it is projected to grow to approximately \$272.7 billion by 2027. Today, there is competition among countries to attract people in the hope of benefiting from health tourism and developing their economies to improve their healthcare systems (Castillo & Lewis, 2024). Many patients turn to health tourism because the health procedures they request can be performed in other countries at relatively cheaper costs, without delays and without having to wait on a long waiting list. According to research, the global health tourism market is expected to grow at a CAGR of approximately 24.5% during the forecast period (2024-2032). In terms of revenue, the global health tourism market size is projected to reach US\$ 86.78 billion by 2032 (Zion, 2022).



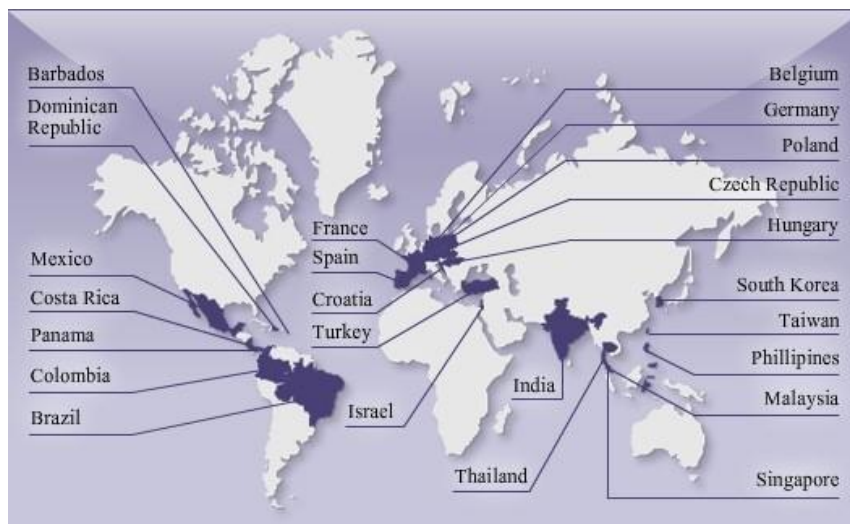
**Graphic 1. Global Health Tourism Market**



Source: [https://www.databridgemarketresearch.com/reports/global-health-tourism-market?srsId=AfmBOoqq\\_NNjkT2Qg-l2HYBfKge0VQVT1SbcczVLtVWRNRw\\_ZBP3kx3Z](https://www.databridgemarketresearch.com/reports/global-health-tourism-market?srsId=AfmBOoqq_NNjkT2Qg-l2HYBfKge0VQVT1SbcczVLtVWRNRw_ZBP3kx3Z).

The bar graph illustrates the projected expansion of the Global Health Tourism Market from 2023 to 2030, highlighting a steady upward trend across multiple regions. North America and Europe emerge as dominant contributors to market growth, reinforcing their established roles in health tourism. The study, conducted by Data Bridge Market Research, underscores the increasing economic significance of health tourism and its sustained trajectory toward USD 410.61 million by 2030.

**Graphic 2. Most Popular Health Tourism Destinations**



Source: Med Journeys (2021). <http://www.medjourneys.com/>.

Graphic 2 illustrates the most popular health tourism destinations for patients from the US, Canada and UK. The world map highlights key health tourism destinations favoured by individuals from the US, Canada, and the UK, spanning regions in Latin America, Europe, the Middle East, and Asia. The selection of these destinations reflects a combination of affordability, specialized medical expertise, and regulatory frameworks that facilitate international patient care. Countries such as Mexico, Thailand, and Türkiye stand out due to their advanced healthcare infrastructure and cost-effective treatment options, reinforcing their roles as global hubs for health tourism (Folinas et al., 2021).

The most important constraint that prevents the development of the health tourism market globally is the lack of expertise and knowledge. Expertise is required to define the intricacies of medical travel and to put the right plans into practice for the best possible results. This is in the form of materials, certifications and training from the world's leading industry figures and leaders. For many health tourism businesses, the lack of access to these is the potential and limited development of the market. At the same time, the biggest obstacle to the development of the global health tourism market is the lack of patient referrals. Knowing where their target patients are can be a major challenge for many health tourism companies and health professionals. While many of these health professionals are equipped with the latest technology and innovative treatment options for the most complex medical conditions, they may not have access to the patient population that needs these therapies. The lack of patient referrals is a significant obstacle to the expansion of the health tourism sector. Despite all this, the most important opportunity that will accelerate the development of the general health tourism market is growing technological development.

The health tourism market is driven by the rapid technological developments in the health sector. As a result of technological developments in the medical field, innovative procedures and treatments are becoming available and providing patients with additional alternatives to meet their health needs. Patients often seek out health tourism destinations to obtain cutting-edge medical procedures and technology that they may not have easy access to in their own countries. Contemporary diagnostic devices, minimally invasive treatments, robotic-assisted surgeries and precision medical approaches are some examples of these developments. In addition, people looking for cutting-edge medical treatments are attracted to health tourism locations by the appeal of these cutting-edge technologies combined with the knowledge of medical professionals (Zion, 2022).

#### **4. Health Tourism in Türkiye**

Health tourism is a subset of the health sector that focuses on the physical and mental health needs of patients traveling between countries for complex surgeries and treatments. Health tourism is attractive to international patients due to low-cost medical treatments in developing countries. Indeed, since the costs of health services are very expensive in developed countries, countries with low health service costs and those that can provide qualified services and the health systems of these countries are becoming attractive areas (Data Bridge, 2023).

According to the Turkish Statistical Institute's systems, 642,444 health tourists visited Türkiye in 2021, representing a 66% increase compared to 2020. The report lists Thailand, Costa Rica, India, Malaysia, Mexico, Brazil, Singapore, Türkiye, Colombia, South Korea, Taiwan, Czech Republic, Spain, Australia, China and Indonesia as popular health tourism destinations.

When we look at the number of health tourists coming to Türkiye and the income generated in the last 5 years, it is seen that there has been a significant increase. In 2019, 756,926 patients received health services in our country within the scope of health tourism and tourism health. The tourism income obtained from foreign visitors and citizens residing abroad who came for health and medical reasons was 1,459,132 thousand US Dollars in 2019. There was a noticeable decrease in the number of health

tourists due to the global pandemic in 2020. 435,691 patients preferred Türkiye to receive health services. The tourism income obtained from foreign visitors and citizens residing abroad who came for health tourism and medical reasons decreased to 1,371,189 thousand US Dollars in 2020. In 2021, a total of 729,592 people received health services and the income obtained from this was 2,016,262 thousand US Dollars. In 2022, a total of 1,381,807 people came to our country to receive health services and the income obtained from this was 2,206,750 thousand US Dollars. In 2023, a total of 1,538,643 people came to our country to receive health services and the income obtained from this was 3,006,092 thousand US Dollars. In 2024, a total of 1,506,442 people came to our country to receive health services and the income obtained from this was 3,022,957 thousand US Dollars. First Quarter of 2025: A total of 354,457 people visited our country to receive health services in the January-March period. Health tourism revenues during this period amounted to 643,356 thousand US Dollars. Health tourism revenues constituted 6.9% of total tourism revenues in the first quarter of 2025. This rate was 5.4% in 2023 and 5.0% in 2024 (USHAS, 2025).

**Table 2. Türkiye's Total Tourism Income and Income from Health Expenditure (2003 – 2023)**

Year	Tourism Income	Type of Expenditure	
		Health Thousand \$	%
2003	13 854 868	203 703	1,47
2004	17 076 609	283 789	1,66
2005	20 322 110	343 181	1,69
2006	18 593 950	382 412	2,06
2007	20 942 500	441 677	2,11
2008	25 415 067	486 342	1,91
2009	25 064 481	447 296	1,78
2010	24 930 996	433 398	1,74
2011	28 115 693	488 443	1,74
2012	29 689 249	627 862	2,11
2013	33 073 502	772 901	2,34
2014	35 137 949	837 796	2,38
2015	32 492 212	638 622	1,96
2016	22 839 468	715 438	3,13
2017	27 044 542	827 331	3,06
2018	30 545 924	863 307	2,83
2019	38 930 474	1 492 438	3,83
2020	14 817 273	1 164 779	7,86
2021	30 173 587	1 726 973	5,72
2022	46 477 871	2 119 059	4,56
2023	54 315 542	2 307 130	4,25

Source: Avşar, M. (2024). An evaluation on the development and importance of health tourism in Türkiye. *Journal of Gastronomy, Hospitality and Travel*, 7(3), 707–715.

Table 2 shows Türkiye's total tourism revenue and revenue from health expenditures between 2003 and 2023, with a general upward trend in both categories. While overall tourism revenue fluctuated, health tourism revenue increased steadily and exceeded 2.3 billion dollars in 2023. This is important in showing that Türkiye is on a good track in health tourism. The ratio of health tourism revenue to total tourism revenue has shown significant growth, especially after 2016, indicating an increase in global demand

for Türkiye's medical services. The significant increase in 2020, when health expenditures reached 7.86% of total tourism revenue, probably reflects the impact of the COVID-19 pandemic due to increased medical travel needs. The recovery after the pandemic became evident in the following years, once again confirming Türkiye's expanding role in the global health tourism market. This trend highlights the economic importance of the sector and its potential for further development.

#### **4.1. SWOT Summary in Health Tourism of Türkiye**

According to many studies conducted on health tourism, the results of Türkiye's SWOT (strengths, weaknesses, opportunities, and threats) analysis can be summarized as follows. Türkiye's strengths in the scope of health tourism: Most of the private health institutions in Türkiye are at a level that can compete with the west. The number of hospitals accredited by JCI and the quality of these hospitals are increasing day by day. The existence of health tourism legislation. Having rich natural thermal resources. Türkiye having suitable climate, historical and touristic civilization destinations. Being in a central position to appeal to a population of 712 million in its immediate vicinity due to its geographical location. Having qualified and young human resources. Having low health service costs compared to other countries. Having candidate country status within the scope of EU membership. Technological and physical infrastructure, bed capacity and physician qualifications of university and private hospitals are sufficient (Kılıçarslan, 2019).

Weaknesses: Marketing in health services is not at a sufficient level, and this area has been relatively neglected. The lack of support and coordination between public institutions is significant. The “collaboration-partnership culture” that will ensure the implementation of the integrated approach required for health tourism is generally weak and inadequate. The vast majority of hospitals, especially public hospitals, do not approach providing health tourism services due to administrative and legal reasons and cannot prepare themselves for health tourism. In the current situation, low value-added “tourist health” services are gaining importance instead of high value-added “health tourism”. A system that will analyse and coordinate comprehensive processes and systems that will record and supervise mobility on a national scale in the field of health tourism has not been fully developed and made operational (Avşar, 2024).

Opportunities: The existence of the basic principles of know-how in transferring knowledge and experience to Türkiye. Employment (healthcare personnel and other personnel) opportunities, economic gain, new investments, social and political power generation abroad, strengthening the financial structure of the private health sector and foreign capital inflow can be evaluated as opportunities (Kılıçarslan, 2019).

Threats: Health tourism is rapidly affected by the global crisis, civil wars and political instability in regional countries and their negative reflections on Türkiye, transportation companies, including airlines, are not sufficiently prepared for patient transfer, the number of competitors in the field of health tourism is high, there is no common data pool and a common platform regarding which procedure can be performed in which health institution, and the insufficient number of organizations that will conduct accreditation based on international standards can be summarized as follows (Şahin & Şahin, 2019).

**Table 3. Türkiye Health Tourism Market Report**

Report Coverage	Details		
Base Year:	2024	Market Size in 2025:	USD 4.01 Bn
Historical Data for:	2020 To 2024	Forecast Period:	2025 To 2032
Forecast Period 2025 to 2032 CAGR:	14.5%	2032 Value Projection:	USD 10.31 Bn
Segments covered:	<ul style="list-style-type: none"> <li>• By Service Provider: Public and Private</li> <li>• By Treatment Type: Cardiovascular treatment, Oncology Treatments, Orthopedic treatment, Neurology Treatments, Cosmetic treatment, Bariatric treatment, Dental treatment, Ophthalmology treatment, Infertility treatment, Weight Loss Surgery, Alternative medicine, and Others</li> <li>• By Patient Demographics: Domestic Patients and International Patients</li> <li>• By Age Group: Children, Adults, and Seniors</li> </ul>		
Companies covered:	Remed Health, AkayLife, Euro Health Medical Tourism, ROMOV Health Tourism and Consulting, Doc's Health Tourism Agency, Tursium Health Tourism Agency, Body Expert, Hospitour Medical Tourism Agency, and Zisut Health Tourism		
Growth Drivers:	<ul style="list-style-type: none"> <li>• High quality healthcare services at competitive prices</li> <li>• Government initiatives promoting health tourism</li> </ul>		
Restraints & Challenges:	<ul style="list-style-type: none"> <li>• Issues with patient follow-up post-procedure complications</li> <li>• Medical record transfer issues</li> </ul>		

Source: Coherent Market Insights, 2025.

According to the Table 3, the health tourism market in Türkiye is expected to grow significantly by 2024 and is expected to reach a market size of 4.01 billion USD in 2025. While the compound annual growth rate is expected to be 14.5% until 2032, sector service providers.

## 5. Economic and Tax Incentives

### 5.1. Economic Incentives

In Türkiye, significant incentives in the field of health tourism have gained legal ground. With these incentives, Türkiye has the opportunity to further advance its position in the field of health tourism. Health tourism incentives offer great opportunities both to entrepreneurs who want to invest in this sector and to international patients who want to benefit from health services. To briefly review these incentives,

- Advertising, Promotion and Marketing Support

Advertisement, promotion and marketing activities are supported in order to increase the international promotion of health institutions.

- Employment Support

This support, which encourages the employment of qualified personnel in the health tourism sector, provides financial advantages to businesses. Thus, it is aimed to ensure qualified employment and this support is implemented for 5 years.

- Health Tourism Patient Travel Support

This incentive, which covers the transportation expenses of patients coming to Türkiye for treatment, significantly reduces the costs for patients and institutions.

- Overseas Unit Rental Expenses Support

Financial support is provided for the rental expenses of offices, branches or representative offices to be opened abroad by health institutions within the scope of health tourism.

- Agency Commission Support

Financial support is provided for commission expenses paid to agencies abroad within the scope of health tourism.

- Overseas Event Participation Support

It is aimed to market health tourism more effectively by covering a portion of the participation expenses of health institutions in events such as fairs, seminars and conferences.

- Foreign Language and Health Tourism Education Support

Financial support is provided for foreign language and professional development education of people employed in health tourism (Ulusal, 2025)

The economic incentives offered support Türkiye's goal of strengthening its advantages in this sector of Southwestern tourism and ensuring that it will generate more visitors and more income from the health tourism sector .

## **5.2. Tax Incentives**

In the Turkish tax system, there are incentives in three different tax laws for international health tourism. Two of these are exempting a portion of foreign earnings from income tax and corporate tax, while the other is VAT exemption for preventive medicine, diagnosis, treatment and rehabilitation services provided to foreigners. For businesses operating in the field of health under the permission and supervision of the Ministry of Health and providing services to non-residents in Türkiye, 50% of the income obtained exclusively from these activities is deducted from the tax base to be declared according to the tax law to which the business is subject (Income Tax Law or Corporate Tax Law). In order to benefit from this discount, the invoice or similar document must be issued in the name of the customer abroad (Taş & Karyağdı, 2024).

There is also a VAT exemption. Accordingly, preventive medicine, diagnosis, treatment and rehabilitation services provided exclusively within health institutions and organisations by real or legal persons authorised by the Ministry of Health to foreigners who are not residents in Türkiye are exempt from VAT. However, services provided for aesthetic purposes - services such as hair transplantation,

skin care, wrinkle treatment, filling applications - and services such as accommodation, transportation and food are not exempt from VAT.

## 6. Conclusion

Türkiye's health tourism sector has gained significant momentum beyond the 1990s and has become a major centre of attraction in the world. However, new competitor countries are constantly entering the market in this field. Therefore, there is serious competition. Due to Türkiye's geographical location, dynamic structure, experience in general tourism and proven service quality, health tourism is an economic engine with the potential to reach 30 billion dollars by 2030. However, in order to go beyond these goals, a holistic approach is needed, and measures should be taken to prevent brain drain in the health sector, threats to this sector should be minimised, and opportunities should be diversified. With the digital economy reaching a significant stage and the emphasis on digital health and market diversification, Türkiye has a high potential to become a global health tourism centre.

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