

Capacity Building of Social Security Institution Project

Sosyal Güvenlik Kurumunun Kapasitesinin Artırılması Projesi



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CO-ORDINATION OF SOCIAL SECURITY WHEN MOVING IN THE EU

Summary of the EU rules concerned with your social security rights when you move to another EU country for work, holidays, study or retirement.



In Belgium :

Federal Public Service Social Security: **Centre Administratif Botanique Finance Tower** Boulevard du Jardin Botanique, 50 bte 1 **1000 Bruxelles** www.socialsecurity.fgov.be

FPS Employment, Labour and Social Dialogue: Service Public Federal Emploi, Travail et Concertation Sociale **Rue Ernest Blerot, 1 1070 Bruxelles** http://www.emploi.belgique.be

> National Office for Social Security: **Office** National de Securite Sociale **Place Victor Horta. 11 1060 Bruxelles** www.onssrszlss.fgov.be

Turkish Embassy Address: 4, Rue Montoyer **1000 Bruxelles - Belgique** Tel: + 32 2 5134095 / + 32 2 5061120 + 32 2 5061140 e-mail: embassy.brussels@mfa.gov.tr

In Germany :

Bundesministerium für Gesundheit **Rochusstraße 1** 53123 Bonn www.bmg.bund.de

Bundesministerium für Arbeit und Soziales Wilhelmstr. 49 10117 Berlin www.bmas.de

Bundesministerium für Familie, Senioren, Frauen und Jugend Glinkastr. 24 10117 Berlin www.bmfsfj.de www.dguv.de

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In France :

Ministere du Travail, de la Solidarite et de la Fonction Publique Ministere du Budget, des Comptes publics et de la Reforme de l'Etat Ministere de la Sante et des Sports Direction de la Sécurité sociale 14, avenue Duquesne 75350 Paris 07 SP www.sante.gouv.fr www.securite-sociale.fr www.travail-solidarite.gouv.fr

Ministere du Travail, de la Solidarite et de la Fonction Publique **Direction Générale de l'action sociale** 7-11, place des Cinq Martyrs du Lycée Buffon 75696 Paris Cedex 14 www.travail-solidarite.gouv.fr

ACOSS Agence Centrale des Organismes de Securite Sociale 36, rue de Valmy 93108 Montreuil Cedex www.acoss.fr

UNCAM Union Nationale des Caisses d'Assurance Maladie 26 à 50 avenue du Professeur, André Lemierre 75986 Paris Cedex 20

Caisse Nationale du RSI 264, avenue du Président Wilson 93457 la Plaine Saint Denis Cedex www.le-rsi.fr

Turkish Embassy Address: 16, avenue de Lamballe 75016 Paris - France e-mail: ambassade.paris@mfa.gov.tr Tel: + 33 153 92 71 11 (3 lines)

Intro

Ibrahim, a Turkish citizen living in Schaerbeek, Belgium, travels every summer with the family to Emirdag for holiday purposes. Unfortunately, the car by which the family is traveling gets involved in a car accident on the A1 highway close to Vienna (Austria) and Ibrahim needs urgent hospital treatment. Who will pay the bill ?

Murat, a Turkish citizen, is working as a self-employed shop-owner in Dortmund (Germany) since 12 years. Before moving to Dortmund, he worked for 7 years in Gent (Belgium) as an employee in the automobile sector. His kids are still living there and go to the local school. Will Murat be entitled to the German or Belgian child benefits or perhaps he may not receive any of both?

Esra has been working as an employee in Leiden for 6 years. Before moving to the Netherlands, she worked in Koln (Germany) for 12 years. Will she have access to an old age pension? Where ?

These are all sorts of questions that relate to your social security rights when you or your family members move for whatever reason (private or professional) across the European Union.

Present brochure tries to give answers to some of the questions that occur when people in the EU are moving or staying abroad even for short periods and for situations that are not work-related such as studying abroad, taking a holiday or moving to another country after retirement.

General context

Every country has its own social security system. These systems comprise of different cash payments or reimbursements when you are for instance ill, invalid, unemployed, retired, have a work accident or professional disease or when you have children. The rules in Germany are different than those in the United Kingdom or in France. In the EU, there are 27 different national systems that regulate how much social contributions one needs to pay and what the entitlement conditions and amounts are of your monthly pension, invalidity benefit or family allowance.

When you are socially insured in one country, the national rules apply. But what happens if you have worked in different countries or your employer requests you to go for a while to another country to work for her/him? What happens if you stay for a short period or reside in another country than where you have your social insurance?

The EU has, since its very existence more than 50 years ago, adopted specific legislation with the purpose that you won't lose any of your rights as a consequence of your mobility, your travel or stay in another country. These EU rules do not change the national rules at all, they just try to find solutions for situations where there is a 'cross-border' or 'international' aspect, like for instance you have worked or are working simultaneously in different countries, you take your holidays abroad, you live and work on either side of the border between two countries, you want to open a new business in another country than where you are established, you would like to spend your retirement in another country than where you have worked, and many other situations.

These EU rules are called the EU rules concerned with the co-ordination of social security for people who are moving throughout the EU.

1-27 EU member states as well as Iceland, Liechtenstein, Norway and Switzerland

Who and where ?

EU rules concerned with social security co-ordination apply to Turkish citizens in the same way as they apply to European Union citizens.²A EU citizen or a Turkish citizen will be able to call on the EU rules for the co-ordination of social security systems when (s)he is covered by at least one social security scheme in a Member State. Turkish citizens who are family members of EU citizens and who are not working can also call upon the EU rules that govern social security rights for migrant persons, just as is the case when the family member would hold EU nationality.

As mentioned before, the EU rules are only applied when there are at least 2 countries involved by virtue of the fact that the person moves or stays (or has moved or stayed) in at least 2 countries :

Ozlem works in Dresden for 5 years, where she becomes unemployed for 3 years before finding a new job in Hamburg. It will be only the German social security legislation that will be applied for what regards her entitlement to an old age pension or an unemployment benefit. Should Ozlem start to work in the Czech Republic instead of Hamburg or in case she takes her holidays in Prague, there are possibly two EU countries concerned with her social security rights. The EU rules will in this case determine which national social security (the German or Czech) legislation applies.

EU rules cover mobility between Member States of the European Union but also Iceland, Liechtenstein, Norway and Switzerland.

However, EU rules do not concern mobility between the EU and other 'third' countries like the U.S., Turkey or Iran. Social security rights covering mobility between an individual EU member state and a 'third country' like Turkey are regulated by bilateral agreements concluded between the two countries concerned.

Sinan worked for 6 years at Standard Liege, a Belgian soccer club, before moving to Bursaspor in Turkey. His social security rights are governed by the bilateral agreement concluded between the Republic of Turkey and Belgium, not by the EU rules.

Turkey has concluded 22 bilateral agreements with the following countries (regions): Albania, Austria, Azerbaijan, Belgium, Bosnia and Herzegovina, Canada, Czech Republic, Denmark, France, Georgia, Germany, Libya, Luxembourg, Macedonia, Norway, The Netherlands, Romania, Quebec, Sweden, Switzerland, Turkish Republic of Northern Cyprus and the U.K. The social security rights of persons moving between Turkey and one of the countries mentioned (and the way around between the country concerned and Turkey) are regulated by the bilateral agreement concerned.

What social security is covered?

The EU rules on the co-ordination of social security apply to most social security schemes that are existing in the EU member states such as sickness benefits, maternity and paternity benefits, benefits in cases of accidents at work or professional diseases, invalidity benefits, old age pensions, survivor's pensions, death grants, unemployment benefits, family benefits and pre-retirement benefits.

They do not apply to social assistance benefits which are usually granted when claimants have insufficient income from other sources.

2- Regulation N° 1231/2010/EU extending Regulations N° 883/2004 and N° 987/2009 to third country nationals.
3- See http://www.sgk.gov.tr for more information on the bilateral agreements.

Examples of such social assistance benefits are the Assistance towards living expenses *(Hilfe zumLebensunterhalt)* in Germany, the 'integration income' *(Droit a l'intégration)* in Belgium, the active solidarity income *(Revenue de solidarité active)* in France, the social assistance allowance *(sociale bijstand : WWB)* in The Netherlands and social assistance allowance *(Sozialhilfe)* in Austria.

The EU rules do also not apply adoption grants, to special child birth allowances, advances to maintenance grants and to cash benefits for victims of war or of terrorism nor to benefits for victims of damages suffered by state employees in the course of their duties.

Which national legislation is applicable?

In cases when at least two countries are concerned (cross-border aspect), the EU rules will designate 1 single national social security system that will apply to your situation. This is the social security legislation of the country where you work, no matter whether you are an employee or a self-employed and even if you live in another country. It is in the country of work where you will pay the social insurance contributions. The legislation of that country will determine which benefits you are entitled to, what their conditions are and levels of payment.

Suleyman works as employee in Saarbrucken (Germany) but lives in Metz (France). Social contributions will be paid according to the German law. When he gets ill or has a work accident it will be the German legislation that applies and determines whether you are entitled to a benefit, what the amount is and what administrative papers or checks you have to complete.

An exception to the general rule that it is the national legislation of the place where you work that is applicable, concerns a situation where your employer has sent you for a temporary period to another country to work for him. In this situation of 'posting' you can remain for maximally 24 months under the social security legislation of the country where you were insured before you have been sent abroad.

For persons who are not economically active, it is the national social security system of the country where you reside that will apply.

Special rules apply when you work simultaneously in different countries and also for mariners.

Main principles of EU co-ordination:

The EU co-ordination rules determine not only which national law is applicable when 2 or more countries are concerned, it also ensures that you as Turkish citizen receive the same entitlement and at the same conditions as any other EU national in a same situation. This is the principle of non-discrimination on the basis of nationality.

Another key part of the EU rules concern situations where you have been insured in different countries and have consecutively paid contributions in different national systems with the aim to ensure that you won't be put in a disadvantaged position as a consequence of your move. When being insured consecutively in different countries, the periods of insurance, of employment or residence are counted together in order to determine the total length of your insurance period or working career. This is the principle of aggregation of periods. Gozde worked consecutively in the city of Luxembourg, Arlon (Belgium) and Nancy (France) for respectively 15, 3 and 5 years. When applying for a pension at the end of her career or when calculating the insurance period under the sickness insurance benefit scheme, her total insurance record of 23 years will be taken into account and not only the insurance period of her last employment in Luxembourg.

Finally, the EU rules prohibit national systems to apply residence conditions inside their national social security systems.

Hasan, a Turkish citizen, works in Belgium but his three young daughters live in Germany. He will receive the French family benefits just as any other EU citizen who is living with the children in France.

Zeynep is entitled to an old age pension in France but wants to go and live in Valencia. She will be receiving her Belgian pension also after her move to Spain.

My sickness and my maternity or paternity

As is the case for all social security benefits, sickness and maternity benefits are different from country to country. Some countries have minimum entitlement conditions, and they require for instance that you have been insured for at least 6 months in order to qualify for a sickness or maternity benefit.

Arzu, a Turkish citizen, started to work in Mannheim (Germany) but after 4 months she found a new job in Bilzen (Belgium). After her start in Belgium it will be the Belgian legislation that determines whether she is entitled to a sickness pay when she falls ill and what conditions she has to comply with. The period of health insurance contribution payment in Germany will be taken into account for calculating the duration of her insurance period under the Belgian sickness insurance legislation.

Sickness and maternity or paternity benefits in cash (cash benefits you receive as a replacement to your income from work) you are entitled to under the applied legislation will be paid to you also in cases you reside in another EU country.

If Arzu still resides in Mannheim while working in Bilzen, she will receive her cash benefit according to the Dutch legislation.

In what concerns the costs of medical care, such as visits to the physician, costs of medicines, hospital care, dental treatment, slightly different rules apply. Generally speaking it is the *legislation of the country where you stay or reside* that determines to what type of health care you are entitled to, how much you have to pay yourself and/or how much you may become reimbursed from the health insurance. In other words, it may be the legislation of another country than the country where you are actually insured which determines the conditions of entitlement.

It is evident that if you stay or reside in the country where you are insured, the national sickness insurance legislation applies and you will be entitled to the benefits in kind and services as established by the national legislation.

If you however *reside in another country than where you are insured*, you are entitled to all medical care provided by the legislation of the country where you reside. In case you are a cross-border worker (you reside in another country than where you work), you and your family members have your rights in the country where you reside but also in the country where you work. In case of frontier workers (you are a cross-border worker, work in one state and reside in another and you travel to work and back home at least once a week), there are some restrictions for the family members. When you reside in another country then where you work, you need to register at the sickness insurance institution of your place of residence. For that purpose you need to ask for the **"S1 form"** at the social insurance institution with which you are inured (in principle at the place of work). The document confirms that you are covered for health care costs.

It will in principle be the health insurance institution where you are insured who will reimburse the sickness insurance institution of the place where you reside.

When you are *staying abroad for short periods of time*, like for instance for holiday purposes or for study, but also for short work related visits, you will always receive the *medical care that is necessary* under the legislation of the country where you stay.

İbrahim who had a car accident in Austria during her traveling for holidays, will be treated in hospital according to the Austrian legislation. The Austrian legislation will determine what care he is entitled to, the costs of the treatment and what İbrahim has to pay himself. It can thus very well be the case that the conditions and amounts are different than in case the accident would have taken place in Frankfurt or further on his way in Sofia, when respectively the German and the Bulgarian legislation would apply and not the Austrian. The costs of the treatment will be reimbursed by the institution where he is insured.

Ahmet, Turkish citizen, 19 years of age and living in Hannover (Germany), goes for a one year study at the technical college in London (U.K.). One day he has tooth ache and goes to the dentist. The U.K. legislation applies, determines whether the dental treatment is classified as necessary and whether the dental care will be provided under the U.K. medical insurance legislation and at what costs. The German sickness insurance will in the eventual case reimburse the U.K. institution.

When you plan to move or travel abroad for private or professional reasons, you can apply for the free of charge European Health Insurance Card at the institution where you are medically insured. This card proves that you are insured and is immediately recognized by all medical institutions in the EU. The card simplifies the procedures of obtaining medical care when you are abroad.

When you go to another country than the country where you are insured *with the specific aim to receive medical care*, you need to ask for permission by the insurance institution you are affiliated to if you want to be covered for the costs. In principle it is up to the sickness insurance institution to decide whether to give the permission or not. In case that such a medical treatment or cost is covered by the health insurance under the national legislation where you are insured and the treatment can not be given in the necessary time required by your state of health, the permission to go abroad for the medical treatment cannot be refused. You will need to request for a "S2 document" which certifies that you are entitled to receive the treatment abroad.

The EU Court of Justice has however ruled that when you are covered by a medical insurance of an EU country and you go to another country for treatment without the authorization as set out in the previous paragraph, you have the right to ask for reimbursement at the institution where you are insured in accordance with the latter's legislation and conditions. The institution where you are insured has to cover the costs in accordance with its national legislation as if the medical care was received in that country. This ruling is applicable only to non-hospital medical care like visits to family physicians, purchase of glasses, dental treatment etc.

Work accidents and occupational diseases:

The EU rules related to work accidents and professional diseases are similar than those governing the sickness insurance. However you will need to complete some specific formalities to inform the institution where you are insured when a work accident occurred or a professional disease is diagnosed.

Invalidity:

Invalidity insurance schemes are very different in the EU countries. Sometimes the invalidity pensions are calculated on the basis of the length of your insurance period, sometimes the pension amounts are fixed and not depending on the past insurance record. In the latter systems you obtain the same amount regardless of whether you were insured for 5 or for 15 years.

When you have been insured consecutively under different national insurance systems, the question raises who will pay the invalidity pension.

In principle you will apply at the institution where you are insured on the moment the invalidity occurs. In case the national system takes into account the period of insurance to determine whether you qualify for the pension, the institution will take into account the periods of insurance previously completed under other national systems. When all systems you have been consecutively insured with apply insurance systems where the amount is depending on the length of insurance, you will receive separate pensions from each of these countries and each of the pensions will take into account the length of insurance completed under that legislation. You will also get separate pensions in case the previous insurance system does not take into account the length of your insurance completed under that legislation and the respective amounts will take into account how long you have been insured in the two respective systems. The same applies in the reverse situation where you were first insured under a legislation in a country where the amount is depending on the length of the insurance and then in a state where the pension does not depend on the length of the insurance period. You will receive two pensions and the amount can be adjusted. If however you have consecutively been insured under the legislation of countries which do not take into account the period of insurance for determining the invalidity pension amount, you will be entitled to one pension of the country where you were insured when you became invalid even if the period of your insurance was very short. On the other hand in such a case, you will not be entitled to a pension from the countries were you were previously insured.

When you are residing in another state than the state(s) which pay the invalidity pensions, you are entitled to receive the pension in your country of residence.

My old age pension and survivor's pension:

When you have worked or have been insured in several EU countries for your old age pension, you will be entitled to a pension from each of these states. Each of the national old age pension insurance systems will pay a pension that is equivalent with the completed insurance record in that country and calculated in accordance with the national rules. You will receive the different pensions when reaching the respective pensionable ages in each of the countries where you have been insured.

Tuna, Turkish citizen, worked as an employee for a fast food restaurant in Belgium, France and the Netherlands for respectively 15, 5 and 25 years. She will be entitled to a pension in the three countries at the respective national pensionable ages, which are 65, 60 and 65. When she turns 60, she will be able to apply for the French pension according to the French legislation. At the age of 65 she will receive three pensions. The Dutch pension amount will correspond with 15/45 of what she would have been entitled to under the Dutch legislation should she have been insured there during her entire career. Her Belgian and French pension amounts will be calculated in a similar way taking into account the period of insurance that she has completed under these legislations. The pensions will be paid no matter in which country you reside even if this country is another country than the countries where you have been insured.

In order to claim your pension, you best can contact the social security institution in charge of the old age pension system in the country where you reside or in the country where you last worked. The contact institution has the obligation to facilitate the exchange of information on your insurance record with the administrations form the other countries. Payments are made directly from the national institutions to you or your bank. As a matter of principle, no transaction cost or administrative costs should be charged for payments executed between member states belonging to the Euro-zone. Some transaction or administrative costs may be applied for payments outside the Euro-zone.

In general, rules that apply for pensions for surviving spouses or orphans are the same as the ones for invalidity and old age pensions.

In what regards pre-retirement benefits some special rules apply. When you are entitled to a pre-retirement benefit in a EU country, you will be able to receive the benefit when you change residence to another EU country as is the case for most of the benefits like the invalidity, sickness and old age pension. However, the main different between preretirement and old age pension system co-ordination is that in cases you move and are insured in different countries subsequently, previous periods of insurance completed in other countries do not need to be taken into account when establishing the right in the last country of insurance.

Unemployed?

In principle you need to claim for your unemployment benefit in the state where you worked last unless you are a cross-border frontier worker and fully unemployed, in which case you need to claim the benefit in the state of residence.

The institution in charge of the unemployment insurance benefit administration of the country where you worked last, has to take into account periods of unemployment insurance that you have completed in other countries. You can ask for a "U1 document", certifying your insurance records from the responsible institution in the countries where you have worked.

Normally you will receive the unemployment benefit in accordance with the national legislation of the country where you worked last. If the benefit takes into account your salary or income, it will be the salary or income that you have received in that state which will be used.

Under certain conditions, you are allowed to look for a job in another member state while maintaining your unemployment benefit for a period of 3 months. The period can be extended to 6 months.

Family Benefits:

Family benefits exist in all EU countries but there are considerable differences as they are sometimes granted on the basis of residence of the parents, on the basis of the country where one is entitled to a pension or on the basis of (self-)employment. When parents work and/or reside in different countries, or when children reside in other countries that (one of) the parents, situations are thinkable that a family is entitled to more family benefits for the same children or periods. You cannot however receive benefits twice for the same period and the same family member. The EU rules therefore establish **priority rules** by determining which connecting factor has precedence in case a family is entitled to several benefits in different countries: If one of the parents is employed or active as self-employed it will be the legislation of the country where the parent is employed that will be applied. Employment has precedence above pension entitlement based or residence based systems.

If both parents are working in different states where family benefits are granted on the basis of employment, the family benefits of the state where the children reside will be applied if one of the parents is working there, if not, it will be the highest family benefit. In case the parents are pensioners and entitled in two different countries where family benefits are paid on the basis of pension entitlements, it will be the country where the children reside that will pay family benefit on the condition that this state also pay a pension. If not it will be the state where the person has been insured or has resided for the longest period. When the family benefits are based on residence of the parents and both parents reside in different states, is will be the family benefits of the country where the children reside.

The EU rules furthermore determine that you are in principle entitled to the highest benefit. When you are entitled to two benefits as a consequence of the priority rules and the designated state's family benefit is lower than the other family benefit, the latter country will pay a supplement corresponding with the difference in amounts between the two benefits.

Some special non - contributory benefits:

All EU member states have cash benefits which are not based on insurance contributions and are usually granted after a verification of your income. They are paid when you reside in the country and when your income is below certain levels. They are usually financed from state revenues. Cash benefits paid to persons with disability who have a low income is in many countries considered as such a special non-contributory benefit.

Unlike the social security benefits described above, these non-contributory benefits won't be paid in case you decide to move to another EU country.

Legal sources:

• Regulation (EC) no 883/2004 of the European parliament and of the council of 29 April 2004 on the coordination of social security systems.

• Regulation (EC) no 987/2009 of the European parliament and of the council of 16 September 2009 laying down the procedure for implementing regulation (EC) no 883/2004 on the coordination of social security systems.

• Regulation no 1231/2010 extending Regulations (EC) Nos 883/2004 and 987/2009 to nationals of third countries who are not already covered by these Regulations solely on the ground of their nationality.

• Directive 96/71/EC of the European parliament and of the Council of 16 December 1996 concerning the posting of workers in the framework of the provision of services.

• "Practical guide – the legislation that applies to workers in the EU, the EEA and in Switzerland", European commission, 2010.



Useful Addresses

You have always lived and are still living in one EU country (you are working there or are not economically active but residing there). You may have plans to move to another EU country for whatever private or professional reason (holidays, study, work, residence,...) In this case, please contact the national social security institutions of the country where you work/reside to obtain more information and/or to collect the necessary documents you need when going abroad. This will avoid later administrative complications and will help to find quicker solutions in case you need access to your rights.

You have lived and/or worked in different EU countries. You may have questions about the past social security coverage in the countries where you have previously resided. Please contact the social security institution of the country where you work/reside at the moment in order to obtain the necessary information and further guidance.

You plan to move to Turkey for holidays, study, work or residence, and have questions about your social security rights. Please contact the social security institution of the country where you work/reside. For additional information, the Turkish embassies can be of help or you can directly contact the SGK at the address mentioned below.

Find out more !

On line :

National Social Security legislation in EU countries: http://ec.europa.eu/employment social/missoc

The EU Co-ordination rules on social security when you move between EU countries: http://www.tress-network.org/

> The European health insurance card: http://ehic.europa.eu

Information on free movement in the EU: http://ec.europa.eu/free-movement-of-workers/

Turkish social security legislation and information on the bilateral agreements the Republic of Turkey has concluded: http://www.sgk.gov.tr

Turkish Social Security Institution Turkish Ministry of Labour and Social Security Turkish Employment Agency **EU Delegation to Turkey European Commission, DG Empl.**

http://www.sgk.gov.tr http://www.csgb.gov.tr http://www.iskur.gov.tr http://www.avrupa.info.tr http://ec.europa.eu/social

For more information :

General :

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In Austria :

Bundesministerium für Arbeit, Soziales und Konsumentenschutz Section II (Pension Insurance) Stubenring 1 1010 Wien www.bmask.gv.at

Bundesministerium für Arbeit, Soziales und Konsumentenschutz Section IV (Social assistance and long-term care benefit) **Stubenring 1** 1010 Wien

Bundesministerium für Wirtschaft, Familie und Jugend Section II (Family and youth) Franz-Josefs-Kai 51 1010 Wien www.bmwfj.gv.at

Bundesministerium für Gesundheit Section I (Central co-ordination, health and sickness insurance legislation, *health policies)* Radetzkystraße 2 1030 Wien

Turkish Embassy Address: Türkische Botschaft Prinz Eugen Str. 40 1040 Wien - Austria Tel: + 431 505 73 38 (4 lines) e-mail: botschaft.wien@mfa.gov.tr

In The Netherlands :

Ministry of Social Affairs and **Employment:** Ministerie van Sociale Zaken en Werkgelegenheid **Postbus 90801** 2509 LV Den Haag Anna van Hannoverstraat 4 www.minszw.nl

Ministry of Health, Welfare and Sport: Ministerie van Volksgezondheid, Welziin en Sport Postbus 20350 2500 EJ Den Haag Parnassusplein 5 www.minvws.nl

Ministry for Youth and Family: Ministerie voor Jeugd en Gezin Postbus 16166 2500 BD Den Haag Parnassusplein 5 www.jeugdengezin.nl

Social Insurance Bank: Sociale Verzekeringsbank Hoofdkantoor Postbus 1100 **1180 BH Amstelveen** Van Heuven Goedhartlaan 1 www.svb.nl

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