

THE SCOPE OF THE COURT'S SELF-INITIATIVE IN ADMINISTRATIVE PROCEEDINGS IN REGARDS TO OBTAINING ASYLUM

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Abstract

In modern day countries, including Georgia, the issue of migration poses an important challenge, the legal regulation of which depends on both state bodies and courts. The 1951 Convention "Relating to the Status of Refugees" is one of the mechanisms for realizing fundamental human rights and freedoms provided by the Universal Declaration of Human Rights. An asylum-seeker who enters Georgia for the purpose of obtaining refugee/humanitarian status has certain rights and obligations, on the basis of which the status is either granted or denied. The issue of granting refugee/humanitarian status may include different (political, religious, etc.) grounds. Ultimately, the primary link that determines the legal status of an asylum seeker is the court. It carries out procedural actions in a way that does not violate both the interests of the state and the rights of the asylum seeker.

Taking into consideration the aspects of administrative proceedings, the court is not limited both in terms of examining the evidence presented by the parties, as well as in regards to its own initiative to investigate the scope of a person's claim and make a decision. It is also important that the court's self-initiative includes not only a formally established standard, but also the ability, if necessary, to request evidence at its own discretion in order to establish the objective truth in the case. However, on certain matters, depending on the specific nature of the case, the court's ability may be limited. Finally, taking into account the distribution of functions of the court and the administrative body, there is a limit on the basis of which it is possible to achieve an absolute result in the aspect of protecting the rights of the asylum seeker.

Key words: asylum seeker, court, refugee/humanitarian status, self-initiative.

Introduction

Determining the legal status of an asylum seeker is one of the most pressing issues. According to the case law of the European Court of Human Rights, in order for a state to be obliged not to allow the return of a foreign national to a country where he or she may become a victim of the acts provided for in Article 3 of the Convention, the reality of the threat must be proven and the receiving state must not be able to eliminate this threat by providing appropriate protection.¹ Based on the Theory of Universality, human rights should be protected anywhere in the world.² An asylum seeker is obligated to go through the appropriate procedure in order to obtain refugee/humanitarian status.³ In the event that the relevant administrative body (the Migration Department of the Ministry of Internal Affairs) does not satisfy the asylum seeker's request, the asylum seeker has the right to apply to the court within the framework of administrative proceedings.⁴ In this respect, both the legal aspects of the case review and the scope of the court's self-initiative during the case investigation process are of interest.

¹ Decision of the Grand Chamber of the European Court of Human Rights on the case N27765/09, *Hirsi Jamaa and others v. Italy* February 23, 2012, paragraph 120.

² Phirtskhalashvili, A., *The Theory of Universality of Human Rights*, Scientific Journal - Justice and Law, #2(41), 2014, p. 74.

³ Law of Georgia "On International Protection", December 15, 2016.

⁴ Article 21²⁴, Administrative Procedure Code of Georgia.

Court proceedings for refugee or humanitarian status have specific elements (eg, expedited hearings, mandatory appointment of a lawyer, provision of an interpreter, different time limits for appealing the decision, etc.). The court, within its discretion, investigates and evaluates the legal and factual (eg, information about the country of origin) situation of asylum seekers and makes a decision accordingly.⁵

The article will discuss the current legal practice related to the granting of asylum, which includes both procedural matters in the court and the inquisitiveness of the judge. In particular, the following will be presented:

- the procedural rights of the asylum seeker, which are ensured by the court;
- the issue of gathering evidence by the court - what kind of evidence the court collects on its own initiative;
- The matter of the examination of evidence by the court - ultimately, what kind of result does the scope of the court's self-initiative help to achieve and how does it affect the state of affairs of the asylum seeker.

Thus, the approach of the court, both from the point of view of the application of imperatively established legal norms, and from the principle of inquisitorial process, is of crucial importance in terms of granting status to the asylum seeker.

1. Legal rights of an asylum seeker

1.1. *The right to appeal to an administrative body*

A foreign citizen who leaves his/her country and enters Georgia for the purpose of being granted refugee/humanitarian status must, first and foremost, meet the general criteria set by law.⁶ This means that he/she must have a reasonable suspicion that he/she will be a victim of persecution in his/her country and, based on fear, must be unwilling or unable to return to his/her country of origin, or he/she may not meet the conditions for refugee status, but would be at risk of serious harm if returned to his/her country of origin.⁷ If the migrant believes that he/she is under such circumstances, he/she applies to the state body - the Migration Department of the Ministry of Internal Affairs of Georgia, requesting the granting of refugee/humanitarian status.⁸ If the administrative body determines in the course of its proceedings that the person should not be granted refugee or humanitarian status, the asylum seeker may initiate legal proceedings, which he/she is not restricted from.⁹ Furthermore, at the current stage of the proceedings, his/her expulsion from Georgia is not allowed.¹⁰ During his/her stay in Georgia, the person enjoys the social benefits that can be utilized depending on the legislation.¹¹

1.2. Right to apply to court

After the asylum-seeker receives an act issued by an administrative body, refusing to grant refugee or humanitarian status, he/she has the right to apply to the court and request a review of the legality of the appealed act, as well as a court order for the administrative body to grant refugee/humanitarian status.

The universally recognized norms governing the disputed issue in the case under consideration are regulated in the 1951 UN Convention "Relating to the Status of Refugees", which Georgia joined by the year 1999, May 28 N1996 -II resolution of the Parliament of Georgia.

At the first stage, the court determines the procedural rights of the asylum seeker, which are regulated before the final consideration of the case. If the person does not have a lawyer, the court, on its own

⁵ Decision of the European Court of Human Rights on the case N37801/97 "Suominen v. Finland", July 24, 2003, paragraph 34; Decision of the European Court of Human Rights on the case N16034/90 "Van de Hurk v. the Netherlands", April 19, 1994, Paragraph 61.

⁶ Article 6, "Law of Georgia on International Protection" December 15, 2016.

⁷ Article 15, "Law of Georgia on International Protection" December 15, 2016.

⁸ Order of the Minister of Internal Affairs of Georgia "On Approval of the Asylum Procedure", April 6, 2020.

⁹ Article 31, Constitution of Georgia, August 24, 1995.

¹⁰ Field, O., (with the assistance of Alice Edwards) Alternatives to Detention of Asylum Seekers and Refugees, Alternatives to Detention of Asylum Seekers and Refugees (April 2006), p. 41-45.

¹¹ Article 33, Constitution of Georgia, August 24, 1995.

initiative, appoints a lawyer for the claimant at the expense of the state.¹² It is important to note that the state duty fee is not paid for such type of lawsuits. Thus, the asylum seeker has procedural privileges in certain matters, which are enforced by the court. In connection with this category of disputes, the case is reviewed no later than two months after the claim is received in the proceedings,¹³ although the case may be considered until the court has fully investigated all the circumstances related to the case. At any stage of proceedings, at court hearings, the asylum seeker is provided with an interpreter in a language he/she understands. Also, the procedure for submitting and appealing the decision is specific. After the court makes a final decision, the asylum seeker must be provided with the fully translated document in a language he/she understands. After that, the person has the right to appeal to a higher court instance (in case of partial satisfaction of the decision or rejection to satisfy) within 15 days.¹⁴ In administrative proceedings, such a maximum time limit for appealing a decision is characteristic only of similar types of disputes. It should also be noted that if the asylum seeker cannot receive a decision translated into their language (via mail or in person), the court does not apply the rule of delivering the decision to him/her through public publication. The aforementioned serves to protect the asylum seeker in order to prevent the dissemination of information about him/her in his/her country of origin. In addition, until the final decision of the court enters into legal force, the asylum seeker is considered to be in Georgia legally and has the right to enjoy other social and legal benefits, unless the person repeatedly, or due to newly discovered circumstances, does not apply to the administrative body for granting status.

In terms of comparison, it should be noted that a foreigner who enters Georgia in order to obtain the right of residence does not enjoy all the procedural privileges listed above, except for the presence of an interpreter at court sessions.¹⁵ Therefore, as it was pointed out, the existing administrative proceedings against the refugee/humanitarian status seeker are characterized by specificity and exceptionality.

2. The scope of the court's self-initiative

The scope of the judge's self-initiative in administrative proceedings is determined by the principle of inquisitorial process.¹⁶ This implies that along with the asylum seeker's right to present to the court the evidence he/she deems necessary, the court can also assist him/her with obtaining and examining evidence. At the stage of court proceedings, all parties participating in the process (plaintiff and defendant) are obliged to present to the court the evidence available to them, to give explanations and correct information. Thus, the scope of the court's self-initiative does not exempt the parties from actively using the adversarial principle.

2.1. Request of evidence from the administrative body by the court

After accepting the lawsuit, the court instructs the defendant-administrative body to present the materials of the administrative proceedings at its disposal. The materials of the administrative proceedings include all the evidence that has been gathered against the asylum seeker;¹⁷ e.g. a questionnaire, a record of an interview with an asylum seeker¹⁸ detailing the reasons why he/she left his/her country of origin, whether he/she was persecuted or not, etc. The protocol of the interview reflects the information provided by the asylum seeker. It should be noted that based on the current practice, persecution mainly entails persecution for religious and political beliefs. In addition, the administrative body presents as evidence the conclusion drawn up by the Status Determination Unit of the Division of International Protection Affairs, which reflects the arguments that the claimant based the request on; evaluation of the aforementioned arguments by the Division; to evaluate the compliance of the request of the interested party with the established criteria in accordance with the 1951 Geneva Convention; Reasoning about the absence of the well-founded fear of persecution against the interested party. According to the recommendation outlined in the conclusion, the Status Determination Unit of the Division of

¹² Article 5, Clause 23, Law of Georgia "On Legal Aid", June 19, 2007.

¹³ Article 21²⁵, Part One, Administrative Procedure Code of Georgia.

¹⁴ Article 21²⁵, Part Two, Administrative Procedure Code of Georgia.

¹⁵ Decision of the Administrative Affairs Board of Tbilisi City Court on the case N3/6427-21, December 17, 2021.

¹⁶ Article 4, Administrative Procedure Code of Georgia.

¹⁷ Article 5, Regulations of the Migration Department of the Ministry of Internal Affairs of Georgia, approved by the order N588 of the Minister of Internal Affairs of Georgia on August 6, 2014.

¹⁸ Article 35, paragraph 2, Law of Georgia "On International Protection", December 15, 2016.

International Protection considers whether the asylum seeker meets the criteria defined by Article 1A(2) of the 1951 Geneva Convention and Articles 15 and 19 of the Law of Georgia "On International Protection" regarding the process of granting refugee or humanitarian status. The court also requests information about the country of origin to determine whether the threat of persecution indicated by the asylum seeker in the event of his/her return to the country of origin is real or not.

Taking into account that the consideration of migration cases has specific characteristics, which are based not only on facts, but also on the information provided by the asylum seeker, the court compares the explanation given by the claimant at the court session and the circumstances described in the interview in the administrative body, in order to clarify whether the claimant's providing false information and attempting to mislead the court. In this regard, the court reserves a special discretion to verify all the evidence and facts within the framework of its own initiative, to additionally request other evidence that it deems necessary and important for the thorough investigation of the case.¹⁹

2.2. Request for confidential information by the court

A foreign person who is seeking asylum in Georgia, within the framework of the above-mentioned procedures, the State Security Service checks whether the person's movement to Georgia or granting him/her refugee/humanitarian status poses a threat to the state. Such information is of a confidential nature and its study is carried out in compliance with special rules. In the event that the refusal of the administrative body to grant the refugee/humanitarian status is based on the conclusion issued by the State Security Service regarding the inexpediency of the asylum seeker's stay in Georgia, the court has the right to request confidential information, at the request of the party or on its own initiative, to determine whether the person is a threat to the state.²⁰ At the stage of the examination, the court examines the evidence presented in a closed session, without any party present during it.²¹ After examining the said information, the court comes to inner conviction in regards to making a decision.²² Notably, the aforementioned information is not disclosed to the parties, including the asylum seeker to whom the information pertains. Also, this information is not reflected in the court's decision. After examining classified information and other circumstances, the court makes a decision, which may include granting, denying, or instructing the administrative body to re-examine the evidence and factual circumstances.

Given that the information sought by the State against a person is confidential, the asylum seeker's only means of examination and investigation of it is the court, in which the asylum seeker must have confidence that the decision made against him/her will be fair.²³ If the court does not approve the claim, the asylum seeker may, using the same rights granted to him/her, appeal the decision to the Court of Appeals. On the basis of this principle, the asylum seeker can employ two kinds of control mechanisms; he/she has the ability to verify whether the information about him/her has been fully studied and ensure that he/she has not become a victim of injustice.²⁴

Based on all of the above, an asylum seeker who is refused refugee/humanitarian status in Georgia by the recommendation issued by the State Security Service, has the right to verify the relevance of the information about him/her through the court. Additionally, the court reserves the right to request this evidence on its own initiative and to assess the adequacy of the facts that constitute as a basis for the claimed inadvisability of a person's stay in Georgia. It is not necessary for the party to request the aforementioned information at the court session, as in accordance with the principle of inquisitorial

¹⁹ Decision of the European Court of Human Rights on the case N21522/93 "Georgiadis v. Greece", May 29, 1997. Paragraph 43.

²⁰ Decision of the European Court of Human Rights in the case N8139/09 "Othman (Abu Catada) v. The United Kingdom", 9 May 2012. Paragraphs 183-185.

²¹ Article 201, Part One, Administrative Procedure Code of Georgia; Decisions of the Supreme Court of Georgia on administrative cases, N7, Tbilisi, 2021, p. 14-20.

²² Judgment of the European Court of Human Rights on the case N37201/06 "Saadi v. Italy", February 28, 2008. Paragraphs 125 and 138.

²³ Gegenava, D., Some issues of justification of the decision of the Constitutional Court of Georgia, in the book: Giorgi Kverenchkhiladze 50, d. Edited by Gegenava, Tbilisi, 2022, 144-152.

²⁴ Ruling of the Administrative Affairs Chamber of the Tbilisi Court of Appeal on case N3b/374-22, March 29, 2022.

process, the judge can offer the party to request such information on its own initiative or request it independently.²⁵

Noteworthy is the kind of situation when the court deems it necessary to request confidential information, despite the asylum seeker not consenting to the court receiving such information, or when the court requests confidential information without hearing the parties' positions. On the one hand, the self-initiative is aimed towards giving the court an ability to fully examine the case even without the parties' motion. However, in this case in particular, it concerns the legal status of an asylum seeker who, according to his/her explanation, left his/her country of origin due to persecution. He/she may not want to share personal information about him/herself with anyone, even with the court. Therefore, the scope of the court's self-initiative, when it concerns the kind of evidence that belongs to the category of confidential information about the migrant, should require the consent of such a person, in accordance with a strictly defined rule, even though this information cannot be made available to the plaintiff.

3. Problematic aspects revealed during the consideration of the case in court

In administrative proceedings, when considering the case for granting refugee/humanitarian status in court, first of all, it is important for the court to evaluate the administrative materials presented by the administrative body. The court examines the presented evidence thoroughly and in great detail. Checking the legality of the appealed administrative-legal act does not only include studying its formal part. A legally correct decision does not mean fair in and of itself. Thus, in the process of consideration of the case, the court is actively involved in the detailed examination of all evidence or issues. The explanation given by the asylum seeker at the court hearing, based not only on the situation in his/her country of origin, but also on the fear of persecution, may be true or false information in individual cases.

The United Nations High Commissioner for Refugees (hereinafter - UNHCR)²⁶ in a report issued in December 16, 1998, on burdens and standards of proof in refugee claims, states that "credibility is established when the applicant has presented a claim that is logical and convincing, does not contradict the generally known facts, is balanced and it is possible to be considered well founded and credible".

Therefore, "reasonable fear" consists of subjective and objective elements. The attitude of the applicant must be supported by objective circumstances and relevant evidence. The following factors are taken into account when evaluating reliability:

- Relevance and sufficient details;
- Relevance of oral or written information presented by the applicant;
- Relevance of the information obtained about the country of origin;
- Credibility.

In general, when examining the applicant's credibility, the court takes into account such factors as the validity of the material facts presented during the proceedings and the consistency/compatibility of the facts presented by the asylum seeker (questionnaire, interview material). E.g. an asylum seeker applies for refugee/humanitarian status on the basis that he/she is being persecuted on religious grounds and believes that if he/she returns to his/her country of origin, his/her life will be in danger because of his/her change of faith. For clarity, if the asylum seeker's country of origin is Egypt, which is an Islamic Republic, and the asylum seeker indicates that he/she has converted to Christianity and has a fear that he/she may be killed if he/she returns to his/her homeland,²⁷ or the person requests asylum in Georgia on the basis that in the country of origin he/she was a member of an opposing political party and was being persecuted because of that, subjectively, the fear may be real, however, on the other hand, the

²⁵ Kopaleishvili, M., Skhirtladze, Nino, Kardava, E., Turava, P., Handbook of administrative procedural law, Tbilisi, 2008, p. 244-246.

²⁶ Established in 1950 by General Assembly Resolution No. 319 (IV) of December 3, 1949, and its mandate provides for the protection of refugees and internally displaced persons and the promotion of States in the direction of long-term solutions to the problems of these people.

²⁷ Egypt. The Muslim Brotherhood: Ideology and a Brief History of the Organization. March, 2018 <http://coimra.gov.ge/ka/2018/03/05/%E1%83%94%E1%83%92%E1%83%95%E1%83%98%E1%83%9E%E1%83%A2%E1%83%94-%E1%83%9B%E1%83%A3%E1%83%A1%E1%83%9A%E1%83%98%E1%83%9B%E1%83%97%E1%83%90-%E1%83%A1%E1%83%90%E1%83%AB%E1%83%9B%E1%83%9D-%E1%83%9D/> [L.s. 01.03.2023].

asylum seeker is obligated to present evidence to prove that he/she is being persecuted or may be persecuted in the future.²⁸ Thus, subjective fear must be supported by objective, real evidence.

Furthermore, the process of examining the materials of administrative proceedings by the court is of importance. The judge examines in detail whether the administrative body has missed any evidence evaluation. For example, an asylum seeker who claims that he/she has been subjected to physical violence (e.g. by a family member) because of his/her religious beliefs, and in support of this, presents a health certificate in which a doctor states that the applicant has injuries on his/her body, it is important that the administrative body examines all the evidence provided by the applicant, and the second issue is whether it is considered to be credible or not. Consequently, the court strictly monitors the process of administrative proceedings conducted by the administrative body, so that no important issue is missed or neglected. It should be noted that the scope of the court's self-initiative includes assisting the asylum seeker with checking the activities of the administrative body, the information about it, to request evidence, to listen to the explanations of the parties, and in the rest, the court is bound to carry out certain actions by itself. E.g. if the court considers that the interview of the asylum seeker in the administrative body was conducted incompletely, or any evidence was not examined, the court orders the defendant - administrative body to re-examine the case.

It is also noteworthy that the information obtained about the country of origin is one of the main evidences to highlight the real circumstances of the asylum seeker's request. It is important that the information is obtained from a reliable source and corresponds to the situation in the country of origin at that time. Based on all of the above, the final assessment of granting refugee/humanitarian status to an asylum seeker is made by the court, although the court's discretion alone cannot determine the truth in the case, unless the active will of the parties is revealed, the absence of which will, ultimately, harm the interests of the asylum seeker or the state.

Conclusion

The administrative body - Migration Department of the Ministry of Internal Affairs of Georgia examines the issue of refugee/humanitarian status for an asylum seeker, while the court evaluates the grounds for its refusal, examines the case materials, determines the real circumstances of the asylum seeker's situation within the framework of its own initiative, and only then makes a decision. As it was pointed out, the court is set to protect the balance, so as not to violate the socio-legal rights of the asylum seeker and the state security. Examining the aforementioned issue during court proceedings is quite difficult and requires a lot of effort, however, taking into account the judge's discretion and the principle of inquisitorial process, by which the judge examines the activities of administrative bodies, the violation of the asylum seeker's rights is reduced to a minimum level.

The article highlights the procedural rights that the asylum seeker has at the stage of consideration of the case. In addition, the scope of the court's self-initiative, the mechanisms it can use to secure evidence, verify it and obtain a fair result were unveiled. Moreover, the matter of requesting and evaluating confidential information by the court was assessed.

The following problematic aspects of the case were highlighted:

- Thorough examination of the evidence by the administrative body;
- Determining the credibility of the information provided by the asylum seeker;
- Verification of the credibility of the information about the country of origin of the asylum seeker;
- Effectiveness of examination of the evidence gathered by the court.

Upon analysing the available information, it was revealed that the asylum seeker enjoys privileged rights precisely due to the special nature of his/her status; it is granted as a result of lengthy procedures and a detailed study of the circumstances of the case.

Based on the above, it is important that the decision made by the court directly affects the legal status of the asylum seeker. After the final decision of the court enters into legal force, if the person has no other reason to stay in Georgia, he/she is obliged to leave the country, otherwise he/she will be expelled,

²⁸ Guidelines on the Procedure and Criteria for the Determination of Refugee Status under the 1951 Convention Relating to the Status of Refugees and the 1967 Protocol, UNHCR, p. 18-25.

which involves returning to the country of origin.²⁹ Consequently, it is the court that has the greatest responsibility to investigate the evidence in the case in detail and to objectively evaluate the circumstances, because if it turns out that the state has wrongly restricted the right to grant refugee/humanitarian status to an asylum seeker in Georgia, not only will that violate the Georgian legislation in relation to migration issues, but also the applicable international treaties.

In conclusion, the court, within its discretion and on the basis of legislation, protects the basic principles provided by the Universal Declaration of Human Rights and Freedoms, thus ensuring the protection of the rights of migrants, not only in terms of legal, but also fair decision-making.

²⁹ Priebe, Stefan, Giacco, Domenico & El-Nagib, Rawda. Public health aspects of mental health among migrants and refugees: a review of the evidence on mental health care for refugees, asylum seekers and irregular migrants in the WHO European Region. World Health Organization. Regional Office for Europe. (2016). p. 18-20. <https://apps.who.int/iris/bitstream/handle/10665/326308/9789289051651-eng.pdf?sequence=3&isAllowed=y>. [L. s. 01.03.2023].

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