

## Summary

The subject of the dissertation is the analysis of the right to access to procedure for international protection. Thanks to the comparative analyse author prove that first of all such right exist and was secure by different kinds of procedural guarantees. First part of the dissertation are devoted to the brief summary of the international refugee law. Author show how similar historical factors leads to the same results in the refugee law. In the core of international protection system was put Geneva convention relating to the refugee status and the rule of non-refoulement. Later both international and European asylum system was developed thanks to the national courts and European tribunals. Because of this today international asylum system consist two main institution - refugee status and complimentary protection.

In the area of asylum procedure all analysed states use similar or identical rules to answer on question if applicants are qualified for international protection. First of all analysed states using non-refoulement rule recognise right to ask for international protection and the right to be heard before the final decision will be made. It could be observed that the most difficult task for the analysed states are find common agreement between them in the area of international protection. However this even in this sphere thanks to such institution like Tribunal in Luxembourg it was possible to put into force some common principles which could be used in the Dublin system. Similar rules are used by the analysed states also in the area of procedure for granting international protection, both in the standard and special procedure. Finally all analysed states recognise right to seek effective remedy on the ground of the asylum procedure. However this that the model of the appeals body could be different still thanks to this an appeal should be examined ex nunc and in full by the court or at least quasi-judicial body.

All of this show how right to access to procedure for international protection was secured in the past, but also lead to some questions about this how it can look in the future. Because of this at the end of the dissertation author decided to propose some issue to research in the future.