

NATIONAL REPORT ON THE EVALUATION MECHANISM OF THE INTEGRATION OF BENEFICIARIES OF INTERNATIONAL PROTECTION

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Preface

The National Integration Evaluation Mechanism (NIEM) is a six-years long transnational project supporting key actors in the integration field to improve the integration outcomes of beneficiaries of international protection. Conflict situations tend to last longer and it takes currently on average 17 years, before refugees fleeing civil wars may eventually have a chance to return to their home country. Hence, the long-term integration of newly arrived beneficiaries of international protection is without alternative and presents an immediate challenge for European societies.

NIEM establishes a mechanism for a biennial, comprehensive evaluation of the integration of beneficiaries of international protection to provide evidence on gaps in integration standards, identify promising practices and evaluate the effects of legislative and policy changes.

NIEM is developed against the background of the changing legal environment on international protection both at national and European levels, induced by the high numbers of new arrivals in the recent years. The project endeavours to provide evidence on some of the most burning discussions concerning these changes: Are EU standards on integration of beneficiaries of international protection well implemented? How are they impacting integration policies? Are policies aimed at beneficiaries of international protection having an impact on successful integration? What are the challenges and good practices, and which policy gaps need to be addressed?

1. Introduction

The present report is the third national report prepared within the framework of the NIEM project. The first report, the national baseline report, was drafted in order to set the baseline for the indicators examined on a national and EU level. To this end, the baseline report examined legal, statistical and policy indicators in order to evaluate the integration of beneficiaries of international protection - BIPs (i.e., refugees, beneficiaries of temporary protection, subsidiary protection and humanitarian assistance) in the following integration pillars:

- 1) Impact of reception
- 2) Mainstreaming
- 3) Residency
- 4) Family union and reunification
- 5) Citizenship
- 6) Housing
- 7) Employment
- 8) Vocational Training and Employment related education
- 9) Health
- 10) Social security
- 11) Education
- 12) Language and social learning
- 13) Building bridges

For the collection of data and submission of the results of the national research to the Migration Policy Group - the coordinating partner for the NIEM project- an electronic toolkit was launched and used for all three phases of the project: the baseline research, evaluation 1 and evaluation 2. The data submitted through the electronic platform was the basis for the preparation of

comparative reports published within the framework of the NIEM project, for all 14 participating countries.

1.1. Note on Methodology

On a national level, for the research carried out in order to update the toolkit for Evaluation 2, ANTIGONE used a combination of various sources. Interviews in a semi-structured manner with a sufficient focus group of BIPs proved difficult in practice due to COVID-19. Whenever circumstances allowed it, other projects carried out by ANTIGONE via zoom and targeted exclusively to BIPs helped the researchers record their experiences in relation to their integration in Greek Society.

Statistical data, where available, was based on data published by the relevant Governmental authorities (i.e., Greek Asylum Service and competent Ministries per field), as well as UNHCR, the Greek Ombudsman and the European Asylum Database “AIDA”.

Qualitative data was collected as follows:

For the field of education:

During the coalition meeting of December 2020 held by ANTIGONE, stakeholders from the field of education (Governmental and non) shared with important data related to the integration of BIPs and challenges they have faced due to COVID-19. NGOs in direct contact with refugees in the camps shared their experiences too.

For the field of housing:

ANTIGONE through another project called BRIDGES-Building bridges in the neighbourhoods of Thessaloniki, held a meeting during which researchers from the NIEM project also participated. In April 2021, refugees themselves spoke and shared their experiences in relation to their integration (some had first arrived in the beginning of the refugee crisis in 2015). They explained the main obstacles they faced upon arrival and after being awarded international protection and how challenging integration has been in practice. The meeting was an important forum where ANTIGONE was able to collect information based on the personal experiences of BIPs themselves.

In June 2021, the national coalition meeting held for the NIEM project included municipal representatives tasked with the implementation of integration policies for the housing of refugees (HELIOS Project). They shared statistical and qualitative data which was in turn used for the outcome indicators.

For the field of employment:

A researcher for ANTIGONE working on the NIEM project, carried out in depth semi-structured interviews with BIPs in order to record their experiences and challenges in the relevant field. The interviews were undertaken around the Roman Forum (Romaiki Agora) in central Thessaloniki between June and September 2021. This neighbourhood has witnessed the opening of many grocery stores and restaurants owned by BIPs who often employ other BIPs. A total of three in depth semi-structured interviews with store owners were made accompanied by some conversations with clients and a location map of the business that opened in the last 7 years. The interviewees clearly expressed to remain anonymous hence the information was treated accordingly.

In June 2021, the national coalition meeting held by ANTIGONE included municipal representatives in charge of carrying out integration policies for the employment of BIPs (namely the HELIOS Project). The data from this meeting was also crucial for ANTIGONE's research.

For all fields:

The national research team also resorted to desktop research which included reports of NGOs, news reports, reports of International and European Bodies. Data shared with ANTIGONE through the coalition meetings, even one during which reporters shared their insights, supplemented the research data.

It should be added that in relation to the category of beneficiaries awarded with humanitarian protection there was no data to add for the period of 2019-2021 because following an amendment to the legal provisions on international protection in Greece, humanitarian protection is no longer awarded. Amendments to the legal framework have also led to the restriction of groups recognised as vulnerable (under the previous law there were more categories for vulnerable groups).

Furthermore, some questions included in the interviews and corresponding to the indicators examined within the NIEM project were left unanswered because they were not applicable to the

Greek framework. In other cases, due to time-limits, difficulties in gathering interviewees etc. it was easier to record responses for the overall issue at hand.

As for the comparative analysis of the 14 countries participating in the NIEM project, all data refer to the legal and other provisions in place as each cut-off date set within the project. Results are scored on a scale from 0 to 100, ranging from the least advantageous to the most advantageous provisions. To highlight the practical meaning of the scores, they are related to four broad ranges in which the framework in place can be considered as being critically lacking (score below 25), marginally supportive (score below 50), moderately supportive (score below 75) and broadly supportive (score up to 100) for the integration of BIPs.

Comparative depiction of results also takes into account the different characteristics of countries providing international protection. While not covering the entire EU, the sample of 14 countries participating represents the full scale of experiences and challenges found in the Union with regard to refugee integration.

To achieve a valid and robust evaluation of results that allows for cross-country comparison, NIEM applies a standardised questionnaire and assessment based on a scoring system (included on the online toolkit and filled in by the researchers of each participating country). Every indicator is formulated as a specific question relating to a different aspect of refugee integration. For most indicators, there are a number of alternative answer options. The first option is based on favourable terms, while the successive options generally represent less favourable or unfavourable provisions. Points are assigned to each policy option, with 100 points awarded to the most favourable and 0 to the least favourable options. Depending on the number of alternative answer options, scores are assigned along a scale from 0 to 100 (for example, when there are three options, scores of 0, 50 or 100 are assigned, while when there are six options, scores of 0, 20, 40, 60, 80 and 100 are assigned, respectively). As for the remaining indicators analysed (mostly asking for absolute figures or percentages), special scoring rules have been developed based on the available data and benchmarks set against the normative framework in use. The specific scoring rules for each indicator are provided, together with the full questionnaire, on the NIEM website (www.forintegration.eu).

In addition, the NIEM questionnaire differentiates between the various sub-groups of beneficiaries of international protection. This allowed for a comparison of the protection and integration framework in place for recognised refugees, beneficiaries of subsidiary protection,

resettled refugees, persons under temporary protection, and persons under humanitarian protection.

1.2. Baseline Report

For the preparation of the first national report, the research covered the period of April 2015 - September 2017. Indicators from all the aforementioned areas were exhaustively examined and the National Report was published in 2018.¹ On an EU level, a comparative report was prepared and published in 2019. The 2019 Baseline report presented for the first time a comparative, indicator-based assessment of the refugee integration frameworks in place in 14 countries: Czechia, France, Greece, Hungary, Italy, Latvia, Lithuania, the Netherlands, Poland, Portugal, Romania, Slovenia, Spain and Sweden.² It is important to note the following key results³ from the 2019 comparative baseline report:

- **The quality of integration policies for beneficiaries of international protection varies widely across European countries, in spite of the standards set by EU and international law.**

Looking at the legal and policy frameworks and the countries' efforts at implementing a collaborative response to the challenges of refugee integration, Europe is far from providing a level playing field. In view of the huge differences among countries identified in this report, beneficiaries of international protection (BIPs) are not given the same fair and reasonable chance to integrate across the EU.

With incomplete and low-quality integration policies in place across the EU, countries create – intendedly or unintendedly – different opportunities for BIPs to achieve a better life in Europe. The danger for social cohesion in countries with incomplete integration policies is that BIPs are at risk of marginalization and pauperisation, and that they could end up in apathy and resignation rather than in a position where they would be able to confidently strive for a better future. Crucially, any European debate on responsibility-sharing in the asylum field needs to take into account the blatant discrepancies in what Member States do to support the integration

¹ Greece, National Report 2018, [Εθνική Έκθεση για το Μηχανισμό Αξιολόγησης](#), available in Greek, last accessed on 27-04-2022.

² NIEM, [The European benchmark for refugee integration, Baseline Report 2019](#), last accessed on 27-04-2022.

³ *Ibid.*, pp. 33-42.

of BIPs and the differences in the outlook for BIPs across the EU caused by the dissimilar performance of Member State refugee integration policies.

- **All the assessed countries can do better, even those found on a generally higher level of development.**

Results for individual countries in most dimensions hover around scores in the middle ranges, indicating only halfway or slightly favourable conditions. By and large, favourable conditions are the exception to the rule. Out of all aggregated scores that have been assigned to an individual country in a specific dimension, only 17% are equal to or higher than 80, indicating a favourable situation. For scores related to the step “Setting the Legal Framework”, this share is 31%, for the step “Building the Policy Framework”, it is 12% and for the step “Implementation & Collaboration”, it drops to a mere 1%. Unfavourable conditions, on the other hand, are widespread. Out of all aggregated scores assigned to an individual country in a specific dimension, 21% are equal to or below 20, representing a situation that is plainly disadvantageous. For scores related to the step “Setting the Legal Framework”, this negative share is 6%, for the step “Building the Policy Framework”, it is 19% and for the step “Implementation & Collaboration”, it rises to no less than 50%. Notably, even the countries with the highest results still have room for further improvements.

For the indicators assessed under the step “Setting the Legal Framework”, the three best-scoring countries (on average across all dimensions) are Spain, Sweden and Czechia, achieving scores in the range between 76.1 and 81.5.

In the step “Building the Policy Framework”, the three best-scoring countries are Sweden, Spain and Italy (scoring between 60.0 and 79.8), while in the step “Implementation & Collaboration”, Sweden, Portugal and Italy (scoring between 44.0 and 51.6) achieve the comparatively highest scores. The median scores of all 14 countries in the three steps are 66.8 (legal framework), 49.4 (policy framework) and 29.0 (implementation and collaboration). No matter on what level of development, and irrespective of future results on the (data-, resource- and outcome-related) steps that are still missing in the evaluation, it is safe to say that all countries assessed need to considerably strengthen their legal, policy and collaboration/implementation frameworks.

- **No significant differences exist between different categories of destination countries.**

Rather, distinct variations exist among countries within these groups. Diverse migration experiences and the countries' histories regarding asylum are not a sufficient explanation for the variations. Results show no significant differences between countries with long and short histories of receiving refugees, or correlations between the countries' region and their position with regard to recent movements. Rather, distinct variations exist among the types of destination countries depicted in the results. Among the countries in northern and western Europe that have a longstanding tradition of receiving refugees, for example, Sweden overall provides more favourable conditions than France and the Netherlands. Among the southern European countries, Greece stands out as providing the least advantageous framework, a position taken among the east-central European countries by Hungary. In other words, the frame conditions defined by geography and exposure to flows or institutional and legal legacies are not decisive for the quality of the integration framework in place. Instead, deliberate policy choices are what makes the difference among countries that find themselves in a similar and comparable situation.

- **Across dimensions that represent decisive fields for long-term integration, countries do markedly worse in some areas than in others in terms of their legal and policy frameworks.**

Looking both at the legal and policy indicators across dimensions related to socio-economic and socio-cultural integration, on average, health and education are the areas with the most favourable conditions among the assessed countries, with social security trailing somewhat behind. On the other hand, employment, housing and vocational training emerge as the dimensions with the least favourable conditions under the focus of this analysis.

- **Language learning and social orientation support is not universally provided, and significant quality differences among the assessed countries persist.**

Among the socio-economic and socio-cultural integration dimensions, language learning and social orientation stand out, as they represent key areas for an early and successful start for integration. Furthermore, these policies genuinely target migrants. If nothing else in terms of long-term and mainstreamed integration support, governments may be assumed to help at least in the acquisition of the new country's language and in learning about how things work. However, results on average are not significantly better in this dimension than for areas like housing, education or employment, and countries are found to provide for very different standards. Half of the assessed countries provide for free language learning courses with no further obligations attached. In the other countries, courses are mandatory and/or not free

and/or attendance is linked to eligibility for benefits. Greece and Hungary basically lack this most fundamental element of a publicly funded integration policy.

Findings on social orientation generally trail those on language learning, with the low quality of such measures emerging as a factor for the overall meagre results in this dimension. Whereas eleven countries systematically foresee social orientation courses, only six implement them by fulfilling at least some quality criteria (standardised curricula, encouragement of interaction with the receiving society, regular evaluation according to uniform quality standards, supplementary information material). Four countries make an effort to provide social orientation courses adapted to at least one special needs group (such as unaccompanied minors, parents, the elderly or semiliterate/ illiterate).

- **Some countries achieve consistent results across dimensions, while for others, results vary significantly between dimensions.**

The first case can indicate deliberate policy choices, the latter may be a sign of lacking an overall approach to refugee integration. A number of countries tend to score consistently across the various dimensions, suggesting that the framework in place reflects deliberate decisions and past attempts to implement a specific approach across different policy areas. Zooming in on the step “Building the Policy Framework” and the areas relevant for socio-economic and socio-cultural integration, countries where the variation of results across dimensions is particularly low are Czechia, Lithuania, Romania and Sweden. While Latvia exhibits a highly consistent pattern, with the exception of the (lower scoring) housing and employment dimensions, France shows a similar pattern, with employment and vocational training as outliers in an otherwise consistent range. On the other hand, distinctly high variation across the dimensions can be identified in Greece, Hungary, the Netherlands, Portugal, Slovenia and Spain. Such findings of variously favourable provisions in policy fields like housing, employment, education or health, despite measuring the same indicator types in each of these areas, suggest an absence of comprehensive policy approaches. Be it due to the neglect of refugee integration as an objective for policy making in itself or resulting from patched-up and sporadic policy development in the past, these countries are faced with a need to balance out, on a high standard, gaps across all relevant policy areas.

- **Countries are better in establishing the legal framework than in taking steps to develop and implement policies, indicating a widespread passive approach to refugee integration.**

Generally, beneficial conditions exist with regard to access to rights, services, benefits and entitlements (i.e., the legal indicators across sectoral policy areas, while putting aside results for legal integration in the dimensions of residency, family reunification and citizenship). In particular, in the areas of housing, health and education, as well as in language learning and social orientation, countries mostly provide favourable conditions for BIPs to access their rights and accelerate their integration process. Not the least, this overall positive picture results from obligations to comply with EU and international laws requiring countries to provide access on a basis equal to that of national citizens. But even here, gaps are found, mainly related to restrictions stemming from conditions that newcomers cannot meet, as have been identified in access to housing and housing benefits (five countries) or access to vocational training and employment-related education (five countries). Concerning access to social security, seven countries either impose conditions that are difficult to fulfil for the newly arrived or exclude BIPs from certain benefits. Access to upper-secondary and/or tertiary education is inhibited in four countries. In contrast to the legal indicators, findings in the context of building the policy framework are, on average, less favourable throughout the dimensions referring to socio-economic and socio-cultural integration. Illustrating a widespread lack of positive support, the evidence of lower-scoring policy indicators suggests that in many countries a rather passive attitude to refugee integration prevails, where policies follow a narrow interpretation of the equal treatment principle and fail to take into account the specific needs and vulnerabilities of BIPs.

Symptomatic for this rather passive approach are the mostly disappointing results on efforts to raise awareness, which are quite indicative of whether a pro-active and supportive spirit prevails. Only Italy, the Netherlands and Sweden appear as countries where the authorities in more than at least one dimension (such as housing, education, health or social security) actively provide information about the specific needs and entitlements of BIPs, and institutions dealing with BIPs are called upon to sensitise and inform their staff.

- **With regard to legal integration in the residency, family reunification and citizenship dimensions, provisions for reunification with family members are, on average, the least unfavourable.**

Most of the assessed countries, however, have restrictive laws for obtaining residence permits or acquiring citizenship. Legal indicators related to residency, family reunification and citizenship – i.e., the legal dimension of integration – on average, show less favourable results than the legal indicators on access to rights across the dimensions related to socio-economic and socio-cultural

integration. To a large extent, more restrictive provisions for beneficiaries of subsidiary protection (BSPs) as compared to recognised refugees (e.g., to obtain residence permits) contribute to the overall very mixed result. A stronger alignment among country results exists concerning family reunification. In compliance with the EU acquis, rather favourable frameworks prevail in this dimension with the notable exceptions of Greece, Hungary and Poland, where major obstacles have been found. On the other side, Portugal and Romania enshrine the most inclusive legal provisions on family reunification without imposing any restrictive requirements (on both recognised refugees and BSPs) to apply for family reunification. Citizenship emerges as one of the worst-scoring dimensions overall, in which differential treatment of BSPs and recognised refugees only exacerbates generally restrictive frameworks. Particularly, the economic, integration and criminal record requirements to apply for citizenship are frequently the same for BIPs as for ordinary third country nationals.

- **Unreasonably high fees for obtaining permanent/long-term residence, family reunification and acquiring citizenship create additional obstacles.**

While most indicators to evaluate legal integration (related to residency, family reunification and citizenship) fall under the step “Setting the Legal Framework”, another set of indicators assess fees and costs, administrative barriers and family tracking services that belong to the step “Building the Policy Framework”. Only in the residency dimension, do these types of indicators, on average, score better than the indicators of a legal nature. A main driver of variation between countries are the fees for obtaining permanent/long-term residence, family reunification and acquiring citizenship measured against the benchmark of the minimum monthly social assistance benefit in the country assessed. While fees for the residency procedure do not generally exceed 50% of this amount (and four countries even exempt BIPs from these fees), fees of the family reunification procedures for BIPs range from zero (in the four countries that waive them for BIPs) to amounts even higher than what is granted as the monthly minimum benefit (in Hungary, Latvia and Romania). Fees for naturalisation also diverge strongly, with Latvia, the Netherlands, Poland, Portugal and Romania asking more than 50% of the monthly minimum social assistance.

- **While the different treatment of recognised refugees and beneficiaries of subsidiary protection is largely absent concerning access to rights and provision of support measures, it is very pronounced concerning legal integration, leading to unfavourable conditions with regard to residency, family reunification and citizenship.**

With few exceptions, recognized refugees and beneficiaries of subsidiary protection (BSPs) are equalized when it comes to access to rights, entitlements and targeted integration measures. However, in the dimensions that are related to the legal integration of BIPs and their family members, with the exceptions of the Netherlands and Spain, all the assessed countries apply differential treatment and provide less favourable conditions for BSPs than for recognised refugees, leading to additional barriers due to the instability and impermanence of their status. In most countries, the state provides a residence permit valid for at least five years for recognised refugees, while for BSPs it is merely valid for less than three years. BSPs must renew their residence permit more often, and countries usually do not waive, as for recognised refugees, conditions for acquiring permanent/long-term residence (i.e., economic resources, language knowledge, housing, integration, fees etc.). With the few exceptions of Italy, Spain and Sweden, BSPs also receive, in most cases, less favourable treatment in comparison with recognised refugees concerning access to citizenship. The number of years' residence required for naturalisation, often reduced for recognised refugees, is usually the same for BSPs as for other third country nationals. In addition, it is common practice that BSPs are eligible for solely a temporary residence permit and can apply for permanent residence only after five years. This legal framework implies that the time period for naturalisation for persons under subsidiary protection is twice as long as for recognised refugees. Overcoming this hurdle requires at least counting the time period for which a temporary residence permit was granted towards the residence requirements of naturalisation.

- **Obstacles posed by administrative barriers are widespread, and countries miss out on opportunities to facilitate integration that are mostly easy to fix.**

Administrative barriers can create particular obstacles to integration. Dedicated indicators assess their prevalence across dimensions, such as systematically asking for hard-to-obtain documentation, excessive delays and waiting periods, as well as discretionary decisions. The dimension in which such obstacles are most widespread among the assessed countries is housing, where all countries in which social housing plays a role in accommodating BIPs pose barriers of some sort. In the employment, vocational training, health and education dimensions, the situation is somewhat less alarming, as in each of these areas, at least six to eight, i.e., roughly half, of the assessed countries are free of such obstacles. Also, regarding residency – the one dimension of legal integration where administrative barriers are evaluated – only six of the countries emerge as obstacle-free. Even in the dimensions of language learning and social orientation, where policies are genuinely designed to address BIPs, only nine countries manage

to provide such courses without posing administrative barriers to accessing them. The countries that are the least affected by administrative barriers across the seven dimensions in which indicators assess their existence are Sweden and the Netherlands, with six obstacle-free dimensions each, followed by Czechia, Hungary, Italy, Lithuania and Poland, with five such dimensions each. On the other hand, France, Greece, Latvia, Romania and Slovenia are countries where, at the most, two of the dimensions are identified as barrier-free, rendering them the countries where BIPs most frequently and most persistently are faced with delays, discretionary procedures and problems related to availability of documentation. Governments should take note that here is an opportunity to facilitate integration through measures that, in many cases, would involve administrative simplification and streamlining, and which could be achieved at relatively low costs.

- **Overall, the step “Implementation and Collaboration” shows the poorest results among the three steps assessed. In particular, countries are weak on mainstreaming refugee integration and lack effective and committed national strategies.**

With regard to collaboration in the development and implementation of policies, the overall governance of refugee integration and involvement of the receiving society, all the assessed countries, without exception, do worse than in the steps related to the legal and policy frameworks. In the step “Implementation and Collaboration”, countries either achieve middle-ranging scores or an average result so low that it must be considered unfavourable. Thus, most countries assessed have a very long way to go before they can be considered as developing, coordinating and implementing an all-of-government and all-of-society response to the challenges of refugee integration. Results on mainstreaming are particularly revealing. The notion of mainstreaming refugee integration is, first of all, assessed in terms of a dedicated dimension, looking into the existence of national strategies and binding commitments for relevant ministries and stakeholders, as well as monitoring and review mechanisms. While the majority of countries have something like a national approach to the integration of BIPs, it is remarkable how fragmented these frameworks often are. Only Czechia, Italy and Sweden combine a dedicated strategy, supported by a devoted budget, with commitments for various ministries. Other countries may not link strategies to a specific budget, operate with a patchwork of sectoral documents or assign responsibilities to various government portfolios in the absence of an overall strategy. Hungary, France (at the time of baseline data gathering), Poland and Slovenia come out as particularly weak, with no such governance elements in place at all. In addition, within the six dimensions related to socio-economic and socio-cultural

integration, indicators assess mechanisms of sectoral mainstreaming. Coordinated multi-stakeholder strategies to facilitate integration in a specific area, it turns out, are equally rare in the housing, employment, vocational training, health, social security and education domains. In each of these dimensions, only three or four countries are identified as fully pursuing such a strategy that commits relevant ministries, institutions, regional/local authorities and NGOs.

This concerns only a limited group of countries, with Italy, Latvia and Sweden each having such mechanisms in place in four or five dimensions, and France, the Netherlands and Portugal in up to three dimensions.

- **Collaboration and joint policy delivery with civil society and local and regional levels of governments is a missed opportunity in most of the countries assessed.**

Stakeholder cooperation in the implementation of integration measures holds the promise of better focused policies, more clearly responding to the needs and perspectives of target groups. With greater legitimacy stemming from broader participation, and more civil society and local/regional actors assuming a role, policies can also become more sustainable and achieve a stronger impact. Across the housing, employment, vocational training, health, social security and education dimensions, indicators, therefore, assess whether partnerships are in place in which central governments actively support stakeholders and provide them with means so that they are better able to assist BIPs. Concerning support for the local and regional levels of government, such active support is rather rare among the assessed countries. If anything, education and social security represent the dimensions where central governments are most supportive, with six countries identified as providing means. In the housing, employment, vocational training and health dimensions, the numbers drop to three or four countries each. The Netherlands, Portugal and Sweden show a semblance of a systematic approach, as in each of these countries, four or even five (in Sweden) dimensions see this sort of government assistance for sub-national governments. In Czechia, Greece, Italy, Latvia and Lithuania, this is the case only in one or two policy fields. With regard to NGOs receiving active central government support for the assistance they provide to BIPs, the overall picture is somewhat brighter. In vocational training, social security and health-related tasks, nine or ten of the assessed governments support civil society. In the areas of housing, employment and education, four to six countries actively support civil society in their efforts. In Czechia, France, Italy, Romania and Slovenia, this takes place in three or four out of the six policy fields, while in Greece, Lithuania, the Netherlands, Portugal, Spain and Sweden, there is civil society support in at least in one or two dimensions. However, often these means are provided in an on-off manner, and NGOs lack

a stable, long-term framework for receiving government support. In particular, in the areas of vocational training, health and social security (poverty relief), government means for civil society are mostly provided only on ad hoc basis.

- **The countries' performance is mediocre at best, and poor in most cases, when it comes to fostering the participation of BIPs, involving the receiving societies in the integration process and acknowledging the two-way character of integration.**

The assessed countries widely fail to build the bridges that would help to bring together people benefiting from international protection and the receiving society. Only in Portugal and Sweden do national strategy documents explicitly call for citizens to become actively involved, with the strategies of a further four countries taking pains to, at least, ask for tolerance and acceptance on the part of their own citizens. Six out of the 14 countries have seen, at a minimum on an ad hoc basis, publicly funded campaigns aimed at sensitising the public about the situation and needs of refugees. Throughout all the assessed countries, encouragement and support for voluntary initiatives to complement public policies is nearly absent from the side of central governments and provided, if at all, on a local level or through ad hoc projects. None of the assessed countries would consider volunteerism a major avenue to support faster integration, worthy of being supported with resources or made part of the country's overall approach to the integration of BIPs. The involvement of refugees in civic activities, strengthening their participation in society, is not much supported, either.

Only the Netherlands and Sweden can be seen as systematically encouraging BIPs to join civic activities and/or volunteer work, while in another six countries, support for such initiatives hinges on civil society or the local level. Consultation with BIPs in matters of their integration and the policies aimed at their integration is nearly unheard of, with refugee integration, at best, being made an additional topic for general migrant integration consultative bodies.

From the scores assigned in NIEM indicators in 14 countries that are rather representative of the entire EU, one can conclude that fostering participation and mutual accommodation with the receiving society is the weakest part of refugee integration policies in Europe.

1.3. Evaluation 1

Following the conclusion of the baseline research and the publishing of the relevant reports (national and EU), all countries participating in the NIEM project proceeded with the second

phase of the project, Evaluation 1. All participating states carried out research for the period of October 2017-March 2019, recording any developments regarding the areas as well as the indicators assessed during the baseline research. Greece published its national report in 2020 which included a presentation of the comparative reports and recorded developments related to the adoption of a new strategy for the integration of third-country nationals, the implications of the EU-Turkey Agreement on the Greek Asylum Procedure, the new guardianship framework for unaccompanied minors and the fields of health and family reunification.⁴ In the report's conclusion the following issues which still remained unresolved from the previous research were highlighted:

A) Vulnerable groups

Persons belonging to vulnerable groups generally do not receive specific treatment in comparison to other beneficiaries of international protection. In fact, the procedure for issuing a residence permit is no different from the one granted to any third-country national. Greece has not yet developed procedures that specifically address the needs of members of vulnerable groups, such as people with disabilities, unaccompanied minors, the elderly, victims of trafficking, single-parent families, etc. On the other hand, Greece has not yet included LGBTI in the definition of vulnerable groups, although most NGOs agree that they are also a vulnerable group that needs separate procedures to ensure the protection of their fundamental rights. Also, although the law provides for the favourable treatment of vulnerable groups during the reception process, the Greek Citizenship Code does not contain any provision that gives priority to these groups during the naturalization process.

Finally, vulnerable groups are entitled to a long-term residency within governmental facilities even before their international protection is granted. The EKKKA is the competent authority for the placement of asylum seekers and vulnerable groups to give them priority when examined. However, the relocation of asylum seekers in the shelters is not automatic, as the application for placement must be submitted to EKKKA and the number of available places remains insufficient and there is a waiting list. The state should address its limited accommodation facilities and create new ones so that members of vulnerable groups do not remain in temporary accommodation facilities unsuitable for their condition.

B) Separate procedure for beneficiaries of international protection:

⁴ Greece, [NIEM National Report 2020](#), last accessed on 27-04-2022.

According to the previous National Report as well as the NIEM comparative reports, beneficiaries of international protection cannot meet the same documentation demands as other third-country nationals, nor can they pay administrative fees or legal aid if they wish to apply for a long stay. Especially in Greece, the beneficiaries of international protection are prohibited from obtaining permanent residence status (this is granted only to investors or property owners). It is therefore necessary to take a separate set of measures to provide them with facilities and meet their needs in order to ensure them full access to legal residence status.

There are also significant administrative barriers preventing beneficiaries of international protection from accessing the residence permit process. The Greek administration suffers from slow and inefficient bureaucracy. Although there is on paper no administrative fee for temporary residence permits, there are costs involved which make it difficult to determine the cost of filing a residence permit application.

There are also significant barriers created by the lack of interpreters or translators in the offices responsible for issuing residence permits. Furthermore, the process is time consuming and there is a lack of the free legal aid that the government should provide. Hence, beneficiaries of international protection, must pay expensive administrative fee for a long-term residence permit when meanwhile they do not have access to a permanent residence.

C) Recording and detailed statistics

As noted in the previous National Report, the availability of statistical data remains problematic. For reasons of transparency and effective evaluation of legal frameworks and policy measures a more detailed statistical database should be established and maintained. The statistical information available does not provide important information for all areas under consideration.

D) Issues of family reunification:

Family reunification continues to be very difficult in practice. Although there are conditions for facilitating the family reunification of refugees when the refugee submits an application within 3 months from the granting of refugee status, (Article 14 par. 1, 3 of PD 131/2006 as amended by transposing the articles 5 par. 4, 11 and 12 of Directive 2003/86 / EC), not all beneficiaries of international protection have the same option. For the family reunification of a refugee who did not submit an application within three months after being granted refugee status, additional conditions must be met - with the exception of unaccompanied minors who enjoy more favourable conditions without time limits (Article 14 para. 13 par. 2 d. PD 131/2006). In addition

to unaccompanied minors, other members of vulnerable groups should be included in more favourable arrangements for family reunification.

On the other hand, the beneficiaries of international protection are additionally charged with expenses related to the travel expenses of their relatives. When it is not possible to cover the travel expenses, the government does not provide free transportation, nor does it cover a percentage of the expenses. It should be noted that Greek law only allows family reunification of beneficiaries with refugee status. Beneficiaries of subsidiary protection or humanitarian status are not entitled to family reunification. Other categories of beneficiaries of international protection (such as beneficiaries of humanitarian aid in this case) must be based on the law. This is the case of third-country nationals and family reunification, which means that, in addition, strict income requirements must be met (housing status, health insurance, etc).

E) Recognition of skills or certificates and access to employment/labour:

With regard to the recognition of skills and access to employment/labour, there are still in practice obstacles for the beneficiaries of international protection to exercise their employment rights because of the strict conditions: presentation of a valid certificate of registration in professional associations or for attending vocational training programs, validated certificates of competency and lack of flexible accreditation process, reduced language skills, lack of state-funded language courses as well as social orientation/inclusion programmes.

F) Access to social benefits:

The obstacles to access to long-term unemployment benefits due to the restrictive interpretation of citizenship requirements continue to exist. Information on social rights is provided mainly by NGOs and there is no measure or policy implemented by the state or an accessible data source (brochure in various foreign languages explaining the rights and how to exercise them, etc.), that could facilitate the beneficiaries to exercise their right to social benefits.

G) Participation of beneficiaries in collective bodies and local councils (Participatory governance):

In general, there is no support for beneficiaries of international protection wishing to engage in political/civic activities. Therefore, participation in political, socio-cultural activities and voluntary initiatives is limited. Immigrant Integration Councils have also not been set up in all local communities. Participatory governance could enhance the chances of integration. Therefore, it should be encouraged by local communities or authorities.

H) The Greek Government has not yet set up a mechanism for the voluntary distribution of refugees in the territory that could contribute to a faster and more efficient utilization of their skills, so that there are better prospects for their absorption into the labour market.

Finally, in Greece, during the period under review, no developments were observed beyond the conclusions reached during the previous evaluation phase which significantly affected the country's scoring regarding the inclusion of beneficiaries of international protection in critical areas. The only notable development was the publication of the new National Strategy, which however, was not included in the evaluation of the second phase (see Evaluation 1). This will be examined in the next phase (Evaluation 2), but it can be already said that such a strategy could count positively for our country.

On the other hand, it should be mentioned that the events that followed the election of the new Government in the summer of 2019 significantly influenced the general policy for the reception and integration of the beneficiaries of international protection in Greece. The Ministry of Immigration Policy was abolished, and a Secretariat was set up under the auspices of the Ministry of Civil Protection (with its very recent restoration). Furthermore, in October 2019, a new law on international protection was adopted. This is a vast legal text which remained in consultation for almost a week, and which introduced several restrictions on the rights of beneficiaries of international protection.

The duration of residence permits for subsidiary protection was limited to one year instead of three. A provision has been introduced forcing asylum seekers to wait six months to gain access to the labour market, as opposed to the previously stipulated access upon applying for asylum. The provision of requiring the family member of a beneficiary of international protection to have a valid residence permit at the time the marriage begins has been maintained in order to be entitled to a residence permit of the same duration as that of his/her spouse. Also, a radical change in the management of vulnerable groups was established first through the reduction of the categories of recognized vulnerable groups and secondly through their inclusion in the Fast Track Border Procedure. Finally, both recognized refugees and beneficiaries of subsidiary protection are now obliged to leave reception and accommodation facilities as soon as they are granted such protection, hence ignoring the provisions stipulated in the HELIOS 2 programme.

Given that these changes will significantly affect the future evaluation of Greece as well as its score within the programme, it is important to take them into account. These changes generally

show that in the issue of inclusion of beneficiaries of international protection, Greece moves one step forward and five backwards.

Shortly after the national research was concluded, a summary of the EU comparative report for Evaluation 1 was drafted and published prior to the publication of the national reports.⁵ A comprehensive report was published soon after that assessing the situation as of 2019 and highlighting key trends.⁶ The Comprehensive European Report compared in detail developments in 14 countries and identified the best practices. In selected indicators a newly introduced analysis explored early integration support for asylum seekers. The key results of the Evaluation 1 comparative analysis were the following⁷:

- Weak dynamics, large gaps prevail: Few changes occurred in the refugee integration framework of the assessed countries between 2017 and 2019. Overall, refugees rarely experience fully favourable conditions to integrate in any area of life. The widest gaps remain to be in policies which would actively support integration, the mainstreaming of policies for long-term inclusion, as well as multi-level and multi-stakeholder collaboration. Most national governments do not work in partnership with civil society and local and regional authorities to develop and implement their policies. Funding the contributions of these actors is a major weakness. While countries score, on average, better in ensuring access to rights and an adequate legal framework, a narrow interpretation of the equal treatment principle often prevails over responding to specific needs and vulnerabilities.
- Improving collaboration, driven by only a few countries: With overall very inert frameworks that are slow to change, the only markedly positive development has taken place with regard to collaboration and implementation. On average among the 13 compared countries, NIEM indicators referring to cross-governmental and sectoral mainstreaming, multi-level implementation as well as the involvement of NGOs and the receiving society improved by more than six points, albeit from a generally disadvantageous level. On closer inspection, the drivers of this development are deliberate efforts to systematically improve refugee integration in France and Lithuania, and to a somewhat lesser extent, in Latvia and Slovenia. In most countries, however, change – if at all – came in a limited and incremental way.

⁵ NIEM, [Evaluation 1: Summary Report 2020](#), last accessed on 27-04-2022.

⁶ NIEM, [Evaluation 1: Comprehensive report](#), last accessed on 27-04-2022.

⁷ NIEM, [Evaluation 1: Summary Report 2020](#), last accessed on 27-04-2022, pp. 7-9.

- Gaps between recognised refugees and beneficiaries of subsidiary protection do not narrow: The gap between residency, family reunification and citizenship rights for recognised refugees and BSPs remains. It narrowed somewhat only in France and Poland, while in Italy the difference in opportunities for long-term integration awarded to these two groups grew even wider. Governments and EU policymakers must consider how this inequality with regard to family unity, permanent residence and access to citizenship negatively impacts their efforts to integrate the more than one million people granted protection in the EU since 2016.
- Few countries act, a few countries slip backwards, most countries sit idle: Countries that have witnessed the strongest positive change across all areas include France, with improved results in ten of the twelve assessed dimensions, and Lithuania, with progress in eight dimensions; followed by Latvia (six) and Slovenia (five dimensions). Countries that saw no improvement in any dimensions are Italy, the Netherlands and Sweden. Romania tops the list of countries with a negative dynamic, having scored worse in five dimensions. Hungary and Italy saw deterioration in three dimensions each. Absence of negative developments across all dimensions is recorded in the Netherlands, Spain and Sweden. Overall, the Netherlands and Sweden turn out to be the two countries with the steadiest frameworks between 2017 and 2019, with no change at all seen in systems on a rather high level of development.
- Diverging integration standards persist across sectors, with gains in some dimensions offset by steps backwards in others: The dimensions with the strongest positive dynamics between 2017 and 2019 are social security, where eight of the 13 countries improved, followed by employment, health and education with five improving countries each. Sectors which saw the highest number of countries deteriorating are residency, housing and health, where three countries each scored worse than two years earlier. Zooming in on the dimensions related to socio-economic and socio-cultural integration, health and education are still the sectors with the overall most favourable legal and policy frameworks among the assessed countries, followed by social security. In contrast, the least favourable conditions across countries are still found in housing, employment and vocational training.

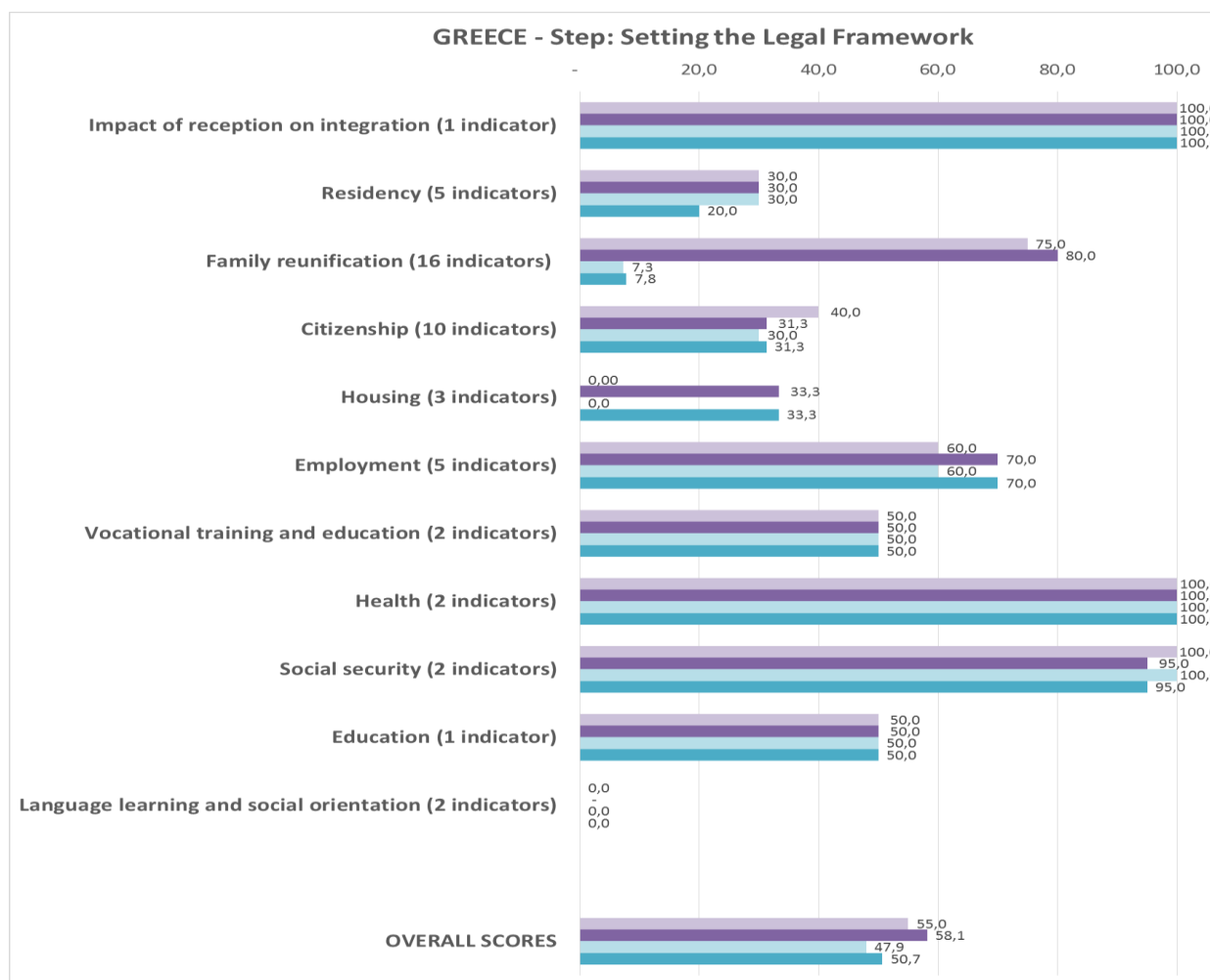
1.4. Evaluation 2

Evaluation 2 is the final phase of the NIEM project. Research for the finalisation of this phase covered the period of April 2019 - March 2021. Due to the unavoidable repercussions COVID-19 has had on the integration policies and their implementation in practice, it was necessary to include the pandemic as a one of the parameters of the Evaluation 2 research. On an EU level, the results of the research aspires to help governments, civil society and other stakeholders to identify gaps in the refugee integration policies of their country, take inspiration from other EU member states and improve the framework in place. Based on defined indicators and a scoring system, its results can serve as a roadmap towards comprehensive refugee integration policies in each of the countries involved.

The present report will present in its second chapter a more in-depth analysis of the most significant developments recorded during Evaluation 2 and from the period of 2019-2021. In the present field the scoring Greece received for these developments (negative and positive) and in reference to setting up the legal framework, building the policy framework and implementation and collaboration (in comparison to the results of Evaluation 1) is displayed in the charts below⁸:

⁸ A more detailed scoring for Greece as well as all other countries participating in the NIEM project is available in the NIEM, [Evaluation 2 Comprehensive Report](#), last accessed on 27-04-2022.

NIEM Scoreboard - Step: Setting the Legal Framework				
	Recognised Refugees 2019	Recognised Refugees 2021	Beneficiaries of Subsidiary Protection 2019	Beneficiaries of Subsidiary Protection 2021
Impact of reception on integration (1 indicator)	100,0	100,0	100,0	100,0
Residency (5 indicators)	30,0	30,0	30,0	20,0
Family reunification (16 indicators)	75,0	80,0	7,3	7,8
Citizenship (10 indicators)	40,0	31,3	30,0	31,3
Housing (3 indicators)	0,00	33,3	0,0	33,3
Employment (5 indicators)	60,0	70,0	60,0	70,0
Vocational training and education (2 indicators)	50,0	50,0	50,0	50,0
Health (2 indicators)	100,0	100,0	100,0	100,0
Social security (2 indicators)	100,0	95,0	100,0	95,0
Education (1 indicator)	50,0	50,0	50,0	50,0
Language learning and social orientation (2 indicators)	0,0	-	0,0	0,0
OVERALL SCORES	55,0	58,1	47,9	50,7



	2019 Recognised Refugees	
	2021 Recognised Refugees	
	2019 Beneficiaries of Subsidiary Protection	
	2021 Beneficiaries of Subsidiary Protection	

NIEM Scoreboard - Step: Building the Policy Framework - legal integration				
	Recognised Refugees 2019	Recognised Refugees 2021	Beneficiaries of Subsidiary Protection 2019	Beneficiaries of Subsidiary Protection 2021
Residency (2 indicators)	66,8	66,8	66,8	66,8
Family reunification (2 indicators)	75,0	75,0	0,0	0,0
Citizenship (1 indicator)	20,0	20,0	0,0	0,0
OVERALL SCORES	53,9	53,9	22,3	22,3

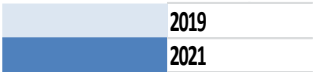
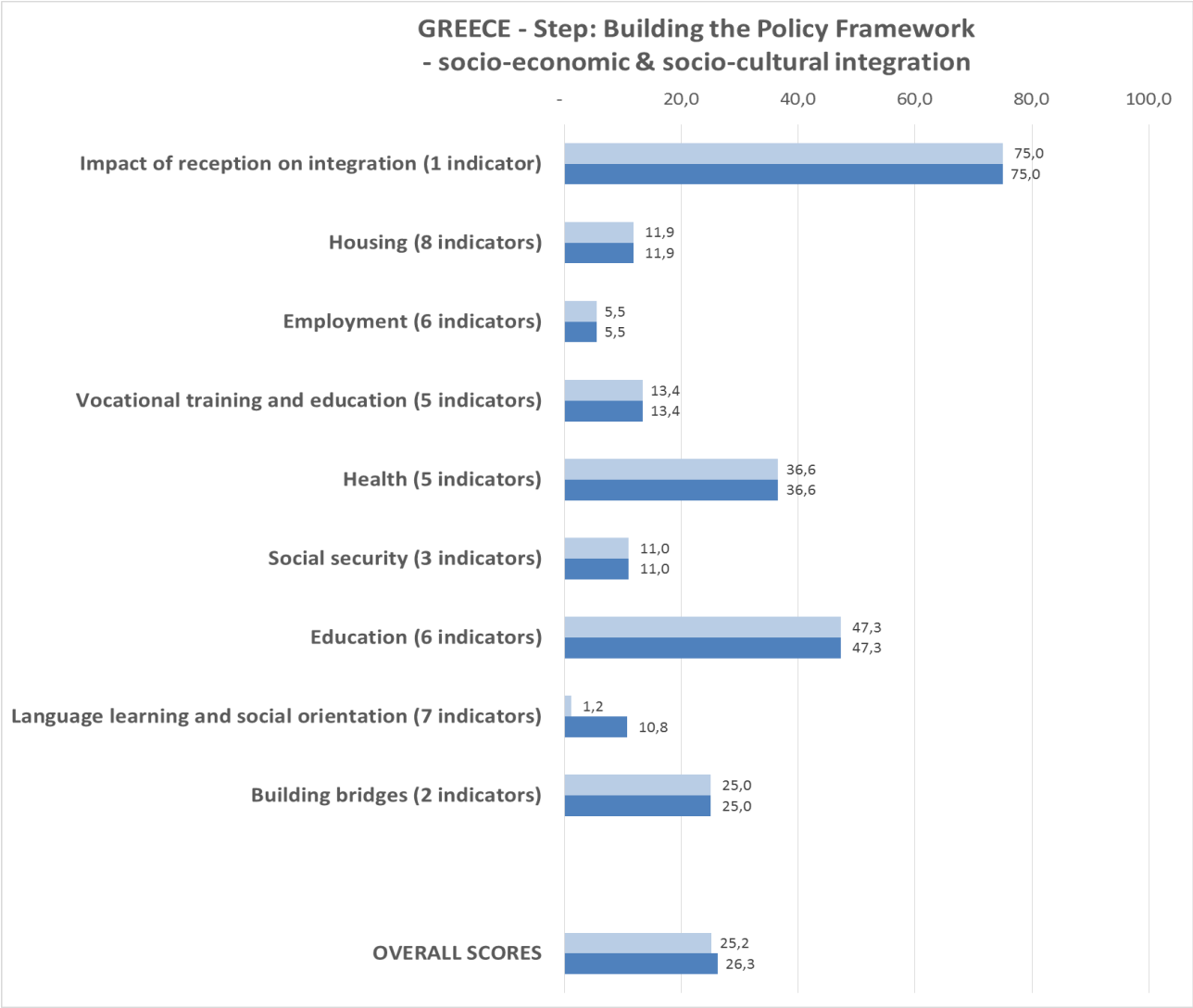
GREECE - Step: Building the Policy Framework - legal integration



	2019 Recognised Refugees	
	2021 Recognised Refugees	
	2019 Beneficiaries of Subsidiary Protection	
	2021 Beneficiaries of Subsidiary Protection	

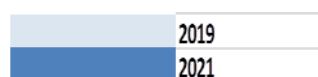
NIEM Scoreboard - Step: Building the Policy Framework - socio-economic & socio-cultural integration

	Ø Recognised Refugees & Beneficiaries of Subsidiary Protection 2019	Ø Recognised Refugees & Beneficiaries of Subsidiary Protection 2021	
Impact of reception on integration (1 indicator)	75,0	75,0	
Housing (8 indicators)	11,9	11,9	
Employment (6 indicators)	5,5	5,5	
Vocational training and education (5 indicators)	13,4	13,4	
Health (5 indicators)	36,6	36,6	
Social security (3 indicators)	11,0	11,0	
Education (6 indicators)	47,3	47,3	
Language learning and social orientation (7 indicators)	1,2	10,8	
Building bridges (2 indicators)	25,0	25,0	
OVERALL SCORES	25,2	26,3	



NIEM Scoreboard - Step: Implementation & Collaboration

	2019	2021
Mainstreaming (3 indicators)	25,0	52,7
Housing (3 indicators)	0,0	0,0
Employment (3 indicators)	0,0	39,0
Vocational education (3 indicators)	16,7	16,7
Health (3 indicators)	33,3	33,3
Social security (3 indicators)	33,3	16,7
Education (3 indicators)	39,0	39,0
Building bridges (5 indicators)	50,0	50,0
OVERALL SCORES	24,7	30,9



Overall, for the period under examination Greece improved its scoring, from 35.7 in 2019 to 39.5 in 2021. However, this is a marginal improvement. Positive developments were recorded in the areas of Mainstreaming, Employment, Family Reunification, Housing and Language Learning & Social Orientation. On the other hand, negative developments were recorded in the areas of Residency, Citizenship and Social Security. The scoring remained the same for the areas of Vocational Training, Health, Education and Building Bridges. In comparison to other countries participating in the NIEM project, Greece appeared to have made most progress in the overall scoring, with France, the Netherlands and Latvia following close behind. However, Greece still

has a low average score, below the 50% mark with a score surpassing that of Romania, Bulgaria, Poland and Hungary.⁹

It should be noted that on an EU level, and according to the key findings of the NIEM Evaluation 2 comparative report, there is a strong divergence amongst EU countries concerning the quality of governments' efforts at refugee integration.¹⁰ The 2021 NIEM comparative results confirm the findings of the previous NIEM reports which demonstrated that each country offers very different levels of support to beneficiaries of international protection. While the overall results suggest that all 14 countries have either moderately supportive or marginally supportive integration frameworks, a differentiated depiction of aggregated results reveals a wider variation. What is more, the results in the latest NIEM comparative report are presented in relation to the concrete steps policymakers need to take in order to establish a framework that is in line with the standards required by international and EU law.

Referring to the reporting period itself, the NIEM comparative report concludes that little has changed in the refugee integration frameworks of the 14 countries in the 2019 to 2021 period.¹¹ In a globally very static picture, changes came incrementally and, while somewhat more pronounced in some dimensions, did not result in any significant overall positive development. As a general pattern across the countries, minor advancements were offset by minor backslidings. These results, however, according to the report, must be seen in the context of the impact of the COVID-19 pandemic. The health, economic and social crises during this period had major negative effects on refugee integration which could not be fully captured by NIEM's indicators on the legal, policy and implementation frameworks in place.

⁹ *Ibid.* pp. 17-27.

¹⁰ NIEM, [Evaluation 2 Comprehensive Report](#), last accessed on 27-04-2022, p. 17.

¹¹ *Ibid.* p. 21.

2. Evaluation 2 and the developments in Greece

As stipulated above, the present report includes an analysis of the developments recorded during the Evaluation 2 period, April 2019 - March 2021. The data from this specific time period was the basis for the comparative analysis of the 14 countries participating in the project. However, given the publication date of the present report, new developments have also been included due to their relevance for the national integration framework of BIPs in Greece.

Before proceeding to the analysis, it should be highlighted that the specific reporting period included significant events which directly affected the integration of BIPs as well as asylum seekers: in February 2020 Greece closed its borders following an incident at its borders with Turkey at Evros, which led to a suspension of the asylum services; the national legislation on international protection and the code of migration underwent reform through consecutive amendments which in turn created a stricter legal framework; COVID-19 led to mass restrictive measures and the further suspension of asylum procedures, meaning that new applications could not be filed leaving third-country in limbo; on the other hand, COVID-19 also allowed for the restriction on the free movement of asylum seekers, by keeping them enclosed and isolated in reception camps on the islands as well as the mainland of Greece (these restrictions remained in force even long after pandemic measures were lifted for the rest of the country); integration policies were stalled however, COVID-19 presented the ideal opportunity to promote remote access to migration services, through the creation of electronic platforms for the submission of applications for the renewal of permits, etc. and permits due to expire were automatically extended through ministerial decisions.

2.1. The National Framework in numbers

For the research period there was no segregated statistical data on the number of beneficiaries of international protection in Greece as of January 2019. The available data at the time indicated only the number of asylum applications by age without distinguishing per gender and separately displayed the number of applications by gender without distinguishing by age.¹² The Greek Asylum Service did not provide any statistics on the areas in which the beneficiaries reside. It only provided an overall number of applications submitted in cities and areas where their offices

¹² All [statistical data](#) is available on the Ministry of Migration and Asylum website in Greek, last accessed on 27-04-2022.

are established and this does not necessarily correspond to the number of BIPs residing permanently in the area. In May 2021, the Ministry of Migration and Asylum published statistical information on its website derived from recordings of the Reception and Identification Centres. Below are charts with data from 2021 (up to September 2021):

Referrals 2021	
Service	Number of Referrals
Police	3.669
Asylum Service	2.968
Social Support or Protection Service (SSoPUM / NCSS)	606
Health Services	484
Voluntary Return	11
Total	7.727

**Statistics for 1/1/2021 - 30/9/2021*

Registered TCNs/stateless persons (by age group) 2021				
Age Group	Male	Female	Unknown	Total
0 - 17	792	311	2	1.105
18 - 25	1.289	348	0	1.637
26 - 33	738	236	0	974
34 - 40	309	93	0	402
41 - 60	237	100	0	337
60+	13	5	0	18
Total	3.378	1.093	2	4.473

**Statistics for 1/1/2021 - 30/9/2021*

**Registered TCNs/stateless persons per category of vulnerability
2021**

Category of Vulnerability	Number of persons
Unaccompanied Minors	525
Disabled	257
Aged (>65 years)	9
Pregnant/Recently given birth	58
Single Parent Families (total number)	252
Victims of physical abuse	241
Victims of trafficking	17
Total	1.359

*Statistics for 1/1/2021 - 30/9/2021

In 2020, 15,696 refugees and migrants arrived in Greece, which demonstrates a significant decrease of 78.9% compared to 2019 and the number of 74,649 refugees recorded (according to the 2021 AIDA report,¹³ this decrease can be attributed to the increase of pushbacks, the militarisation of the borders, and the restrictions stemming from the COVID-19 pandemic).

A total of 9,714 persons arrived in Greece by sea in 2020, compared to 59,726 in 2019. In 2021 there were 4,331 sea arrivals. As of 2022, the majority of arrivals are from the State of Palestine (47,7%), Afghanistan (4,7%), Syria (1,0%) and DRC (2,2%).¹⁴ More than half of the population included women (23,3%) and children (35,5%), while 41,2% were adult men. Moreover, 5,982 persons arrived in Greece through the Greek-Turkish land border of Evros in 2020, compared to a total of 14,887 in 2019, according to UNHCR.

In 2020, First Instance decisions awarded refugee status in 26,371 cases and subsidiary protection in 7,954.¹⁵ In the appeals phase, 481 cases were granted refugees status, 564 were granted subsidiary protection and in 370 cases humanitarian protection was granted. In 2021, 13,781 applicants were awarded with refugee status (for both instances) and 4,668 were awarded with subsidiary protection (for both instances).¹⁶

¹³ AIDA, [COUNTRY REPORT GREECE](#), 2020 (June 2021 update), last accessed on 27-04-2022, p. 37.

¹⁴ UNHCR, OPERATIONAL DATA PORTAL, [Mediterranean Situation Greece](#), last accessed on 27-04-2022.

¹⁵ AIDA, [COUNTRY REPORT GREECE](#), 2020 (June 2021 update), last accessed on 27-04-2022, p. 9.

¹⁶ Ministry of Migration and Asylum, Information Memo - December International Protection 2021, Ενημερωτικό Σημείωμα, 2021 [Αεκέμβριος-Διεθνής Προστασία](#), available in Greek, last accessed on 27-04-2022.

Law 4636/2019 (Article 83), states that an asylum application should be examined “the soonest possible” and, in any case, within 6 months, in the framework of the regular procedure. This time limit may be extended for a period not exceeding a further 3 months, where a large number of third country nationals or stateless persons simultaneously apply for international protection. According to Law 4636/2019, in any event, the examination of the application should not exceed 21 months. Official data of the Ministry of Migration and Asylum only provides information on the average length on proceedings for the second instance (appeals phase): 89 days from the filing of an appeal and 54 days from the examination of the appeal.¹⁷

According to AIDA,¹⁸ for the applications lodged on the mainland exclusively within 2020, the average period between the registration and the personal interview, was 61 days, while the average period between registration and the issuance of a first instance decision was 67 days (so on average a total of 128 days). However, and despite the significant decrease on the number of new asylum applications registered in 2020 and the number of first instance decisions issued during the year, significant delays occur in processing applications at first instance if the total number of pending applications is taken into consideration, i.e., applications registered within 2020 and applications registered the previous years and pending by the end of 2020. More precisely, more than 1 out of 2 of the applications pending at first instance at the end of 2020 (68.3%), was pending for a period over 12 months since the day they were registered (39,211 out of the total 57,347 applications pending at the end of 2020). In addition, in the 60.85% of the applications pending by the end of 2020, the personal interview had not been conducted (34,896 out of the total 57,347 applications pending at the end of 2020). Out of those applications in which the interview had not been conducted by the end of 2020, in 43.3% of the pending cases the interview has been scheduled after 2021 (15,142 cases). It should be noted that fast-track procedures and prioritised examination are applied by the reception services where decisions are issued within 20 days. Syrians as of 2014 are eligible for fast-track procedure and in 2020 the average period was 24 days. On the other hand, for vulnerable groups it was 94 days.

Substantial asylum reforms, driven by the implementation of the EU-Turkey statement, also took place in 2018. Provisions related to the implementation of the statement introduced by Law 4375/2016 in April 2016 were amended in June 2016 and subsequently in March 2017, August 2017 and May 2018. Law 4540/2018 provided the possibility of participation of Greek-speaking

¹⁷ *Ibid.*

¹⁸ AIDA, [COUNTRY REPORT GREECE](#), 2020 (June 2021 update), last accessed on 27-04-2022.

EASO personnel in in the regular procedure and transposed the recast Reception Conditions Directive. On the involvement of the EASO in national asylum procedure, the European Ombudsman highlighted¹⁹ that *“In light of the Statement of the European Council of 23 April 2015 (Point P), in which the European Council commits to ‘deploy EASO teams in frontline Member States for joint processing of asylum applications, including registration and fingerprinting’, EASO is being encouraged politically to act in a way which is, arguably, not in line with its existing statutory role.”*

Major delays were recorded in the identification of vulnerability on the islands, due to significant lack of qualified staff, which in turn also affected the asylum procedure. As highlighted in the report of the Commissioner for Human Rights of the Council of Europe, *“the vulnerability assessment procedure... is reportedly excessively lengthy and often fails”*.²⁰ In a positive development, a regulatory framework for the guardianship of unaccompanied children was introduced for the first time in Greece in 2018. The guardianship system, however, was still not operational as of March 2021.

Law 4636/2019 “on international protection and other provisions” Gazette 169/A/1-11-2019 which entered into force in January 2020, made significant amendments to the definition of vulnerable persons and persons in need of special procedural guarantees. According to Articles 39(5)(d) and 58(1) of this law the following groups are considered as vulnerable groups: *“children; unaccompanied children; direct relatives of victims of shipwrecks (parents, siblings, children, husbands/wives); disabled persons; elderly; pregnant women; single parents with minor children; victims of human trafficking; persons with serious illness; persons with cognitive or mental disability and victims of torture, rape or other serious forms of psychological, physical or sexual violence such as victims of female genital mutilation.”* Persons with post-traumatic stress disorder (PTSD) have been removed as a category of persons belonging to vulnerable groups. According to Article 58(2) of Law 4636/2019 *“The assessment of vulnerability shall take place during the identification process of the Art. 39 of this law without prejudice to the assessment of international protection needs”*.

¹⁹ European Ombudsman, [Decision in case 735/2017/MDC on the European Asylum Support Office’s’ \(EASO\) involvement in the decision-making process concerning admissibility of applications for international protection submitted in the Greek Hotspots, in particular shortcomings in admissibility interviews](#), para. 33, last accessed on 27-04-2022.

²⁰ Council of Europe, Report of the Commissioner for Human Rights of the Council of Europe Dunja Mijatović following her visit to Greece from 25 to 29 June 2018, [CommDH\(2018\)24](#), 6 November 2018, last accessed on 27-04-2022.

According to article 58(4) of Law 4636/2019 *“Only the persons belonging to vulnerable groups are considered to have special reception needs and thus benefit from the special reception conditions”*. Article 58(3) of the above law provides that *“[...] the special condition of applicants, even if it becomes apparent at a later stage of the examination of the application for international protection, is taken into account throughout this procedure [...]”*.

According to article 67 (1) of Law 4636/2019 relating to special procedural guarantees *“The Receiving Authorities shall assess within a reasonable period of time after an application for international protection is submitted, or at any point of the procedure the relevant needs arise, whether the applicant requires special procedural guarantees, due to their age, gender, sexual orientation, gender identity, psychological disorder or because they are a victim of torture, rape or other serious forms of psychological, physical or sexual violence.”*

Even though in 2020 there were no long delays between the arrival and the vulnerability assessment (as was the case before) the low quality of the process of medical and psychosocial screening remained a source of serious concern for most NGOs. According to their reports, vulnerabilities are often missed, with individuals going through the asylum procedure without having their vulnerability assessment completed first.²¹ UNHCR reported that *“access to health care for asylum-seekers and refugees continued to be limited at several locations across Greece, in particular on the islands, mainly due to the limited public sector medical staff and difficulties in obtaining the necessary documentation.”*

2.2. Major developments and Legislative amendments affecting Greek immigration Law

- National Strategies

As reported in previous national reports, there has been no formally adopted national integration strategy aimed exclusively at beneficiaries of international protection. In 2013, the Ministry of Interior had introduced a national strategy for the integration of third country nationals.²² A draft for a new national strategy on the integration of third country nationals was published on the Government Public Consultation website on January 15, 2019. The final national strategy was adopted and published on July 5, 2019, on the Ministry of Migration

²¹ AIDA, [COUNTRY REPORT GREECE](#), 2020 (June 2021 update), last accessed on 27-04-2022, p. 23.

²² Ministry of Interior, National Strategy for the integration of third-country nationals, 2013, [Εθνική Στρατηγική για την ένταξη πολιτών τρίτων χωρών](#), 2013, available in Greek, last accessed on 27-04-2022.

Policy's Website.²³ The National Strategy is funded through a combination of EU and national sources. The national strategy includes actions targeting beneficiaries of international protection, however no separate budget is allocated for BIP exclusively. The basic tenets of this strategy are:

- To enable the integration of beneficiaries of international protection and applicants of international protection who temporarily reside in the country, and/or will remain in the country-if they are granted international protection.
- To assist migrants who struggle to maintain their lawful residence status due to the economic crisis.
- To involve more the local government administrations and enhance their role in the formation of social integration policies.

Raise public awareness with regards to the importance of social integration and inclusion.

- To coordinate and align the activities of all governmental and state bodies towards the implementation of a common national strategy.
- To collaborate and align with international and private state bodies as well as civil society.
- To modernize and digitize the administration processes for resident permits and international protection status.
- To inform migrants promptly and thoroughly with regards to new national developments in migration policy, activities and programs, as well as their rights and obligations in the context of social integration.

This national strategy seeks to promote the integration of migrants and BIPs through the local administration (municipalities and prefectures). With the exception of very few actions (such as housing) this national strategy has not been fully implemented.

According to the new National Strategy the Ministry of Migration will evaluate the integration of third-country nationals based on specific quantitative and qualitative indicators in order to monitor the implementation of the strategy on an annual basis. All ministries and the local authorities shall on an annual basis draft a report which will evaluate their integration policies

²³ Ministry of Migration and Asylum, National Strategy for Integration, 2019, [Εθνική Στρατηγική για την Ένταξη](#), available in Greek, last accessed on 27-04-2022.

and actions based on the indicators set by the Ministry of Migration. All these reports will be submitted to a working group which shall evaluate the policies and actions and prepare suggestions for improvements, etc.

The implementation of the New National Strategy of Integration has been minimal in practice. This might have been due to the COVID-19 pandemic but also due to the fact that the strategy was adopted under the previous Government. The new Government which came into force in July 2019 initially followed a different strategy in relation to newcomers (the relevant Ministry of Migration was abolished and instead a Secretariat for Migration Policy was introduced under the auspices of the Ministry of Citizen' Protection. The Ministry of Migration and Asylum was then reinstated after a couple of months).

A National Strategy for the Integration of Asylum Seekers and International Protection Beneficiaries was launched for public consultation on 1 December 2021, long after the reporting period of Evaluation 2 and therefore it is not included in the scoring for the comparative analysis.²⁴ This strategy was based on the EU New Action Plan (24/11/2020) and adopted the European Commission's recommendations for social inclusion, with emphasis on early action and the pre-integration process for those with a refugee profile.

The new strategy included four main pillars:

- (a) Pre-integration of asylum seekers for the smooth transition of adults into the work field and subsequently for the transition of minors from informal to formal education, without any discrimination.
- (b) Social inclusion of beneficiaries of international protection through the development of intensive education and training programmes so as to facilitate the access of beneficiaries to the labour market.
- (c) Prevention and effective protection against all forms of violence, exploitation and abuse by strengthening reporting mechanisms.
- (d) Monitoring and supervision of the integration process through publicly acceptable and comparable indicators.

²⁴ Ministry of Migration and Asylum, National Strategy for the Social Integration of Asylum Seekers and Beneficiaries of International Protection, 2021, [Εθνική Στρατηγική για την Κοινωνική Ένταξη Αιτούντων Άσυλο και Δικαιούχων Διεθνούς Προστασίας](#), 2021, available in Greek, last accessed on 27-04-2022.

Promotion of the European way of life and the rule of law constitutes one of the main objectives of the strategy as well.

The proposed actions revolve around strengthening independent living, social housing, employment and social welfare. The provision of properly trained and certified interpreters in the main languages of asylum seekers and refugees is included in all the actions of the strategy.

Particular emphasis is given to the enhancement of educational and professional knowledge, training, skills acquisition and language learning. The educational process is governed by the principle of equal access in terms of quality, non-discriminatory and inclusive education. Apart from formal education, non-formal education is provided at the pre-integration stage. The latter is holistic in nature and includes, in addition to learning Greek, such topics as familiarity with the European way of life, the principles of democracy and gender equality, prevention of domestic violence, and the fight against human trafficking.

Regarding the implementation of the new National Strategy, apart from cooperation between the competent Ministries, coordination mechanisms have been provided at all levels of governance and in particular at the level of local and regional authorities, while an important role is taken by other competent bodies for the preparation, development and planned implementation of various actions, including cooperation with International Organizations and NGOs.

According to the Plan, the development of professional skills is supported via:

- a) vocational training and apprenticeship
- b) specialization through initial or ongoing education (VET- Vocational Education Training)
- c) training seminars for job search and enhancing technological skills
- d) development of handicraft workshops
- (e) facilitating networking with local cooperatives and women's associations.

Finally, in terms of raising public awareness on issues related to the rule of law, human rights, social cohesion and integration, the strategy includes the following actions:

- Action 1: Raising awareness among local communities through close cooperation with the Local Government.

- Action 2: Organization of sports, social, recreational refugee activities (chess tournaments, basketball, volleyball).

- Legislative Amendments to Greek immigration law

a) Subsidiary Protection, Humanitarian Protection and Vulnerable groups

Following the entry into force of Law 4636/2019 (January 2020), beneficiaries of subsidiary protection no longer have the right to receive a 3-year permit. Previously, Article 21 par.3 of Law 4375/2016 which replaced Article 24 of Presidential Decree 141/2013 (Article 24 of the Directive 2011/95/EU), by providing explicitly for a uniform approach as concerns the issuance, the 3 years duration and the renewal of residence permits for all beneficiaries for international protection (refugee status, subsidiary protection). Now, beneficiaries of subsidiary protection may obtain a 1-year residence permit, renewable for a period of 2 years (Article 24 of Law 4636/2019 “on international protection and other provisions” Gazette 169/A/1-11-2019).

It should be noted that humanitarian protection (introduced through Article 67 of Law 4375/2016) was abolished according to Article 61 (e) Law 4686/2020; this provision is applied to all decisions granting humanitarian protection published from 1 January 2020 and onwards. Previously, the duration of humanitarian protection was 1 year and renewable for 2.

Applications for renewals should be submitted no later than 30 calendar days before the expiry of the residence permit. The mere delay in the application for renewal, without any justification, could not lead to the rejection of the application, according to the previous legislation. However, following the entry into force of Law 4636/2019, this applies only to recognized refugees, as the new law abolished the relevant guarantee for beneficiaries of subsidiary protection.

b) Naturalisation

The Greek Citizenship Code (Law 3284/2004, Gov. Gazette A' 217/10-11-2004) has been subject to numerous amendments during the past years namely, through Law 4604/2019 (Gov. Gazette 50/A/26-03-2019), Law 4674/2020 (Gov. Gazette 53/A/11-03-2020) and Law 4735/2020 (Gov. Gazette A' 197/12-10-2020)).

Law 4604/2019 addressed significant obstacles in the naturalization procedure for persons with disability and the elderly. Until recently, there was no provision in the Greek citizenship law for persons with intellectual disability or psychiatric problems; as a result, such persons were

indirectly excluded from naturalisation procedures which require an interview and Greek citizenship acquisition procedures by way of birth and studies in Greece.

Articles 31 and 32 of Law 4604/2019 facilitated the acquisition of Greek nationality through favourable terms for the following categories of persons with disabilities:

- Persons with Disability who are children of legally residing aliens, have been born or raised in Greece, with a certified disability of 80% and who were unable to attend a Greek school, including special-education schools (Article 31).
- Adult aliens who have a certified mental or physical disability of 67% and above and as a result cannot be included in the examination procedure for meeting the Greek society integration criteria (Greek language knowledge and naturalisation test, Article 32 para. 4).

Unfortunately, a legislative proposal to abolish Article 31 of Law 4604/2019 was included in a draft law of the Ministry of Interior, which was published for public consultation on November 18, 2019. The relevant article was not abolished however and article 39 of Law 4674/2020 suspended all ministerial decisions which were issued for its implementation for a period of six months from the publication of this law.

Prior to the amendment of March 2020, refugees could apply for citizenship under the conditions that *inter alia* they reside lawfully in Greece for a period of 3 years. The amended legislation has increased this period to 7 years, similarly to the time period required for all foreigners residing in Greece on other grounds (regular migration law) despite the legal obligation under article 34 of the Geneva Convention 1951 to “*facilitate the assimilation and naturalization of refugees*” and “*in particular make every effort to expedite naturalization proceedings*”. The aforementioned amendment does not apply retroactively to refugees who had already submitted an application for their naturalisation and that was still pending examination by the entry into force of Law 4674/2020.

Following the adoption of Law 4735/2020, a Decision by the Ministry of Interior was published in April 2021 concerning the requirements for the economic and social integration that applicants must meet in order to apply for Greek citizenship (Decision No. 29845/2021 Gov. Gazette B’1652/22-04-2021). The decision established unprecedentedly specific and strict financial criteria that are effectively impossible to meet in practice.

The Decision stipulates that: “*A foreigner who wishes to become a Greek citizen must prove that he has an annual income that ensures him an adequate standard of living without*

burdening the social welfare system of the country (...)". Adequate standard of living in practice means that the annual income of the applicants must reach 7.800 euros (based on the current national minimum wage).

Yet there are other additional strict requirements. Applicants must prove this sufficient income, not only for the previous year, but for more - depending on the years of previous legal residence required for the naturalization application. Specifically, the Ministerial Decision states:

"For applicants who are required to complete 3 years of previous legal residence (EU citizens, spouses of Greek citizens with children) they must prove sufficient income for all 3 years. For those who are required to complete 7 years (refugees or subsidiary status, those who awarded humanitarian protection, long-term, second generation, third country family members of Greek citizens) must prove sufficient income at least for the previous 5 years before submitting application. For those who are required to complete 12 years (those who hold other types of residence permits) they must prove sufficient income at least for the previous 7 years before submitting the application (...)".

Previously, when the bill on the new naturalization system was being discussed in Parliament, the General Secretariat of Citizenship attempted to introduce the minimum sufficient income as a criterion for naturalization. Many NGOs, such as the NGO Generation 2.0 RED expressed their opposition through the public consultation stage, pointing out that acquiring citizenship will become a privilege for very few.²⁵ Following the reaction from the opposition parties, even from the MPs of the governing coalition, the former Minister of Interior introduced a legislative amendment withdrawing the provision on the grounds that it would indeed exclude a large number of applicants.

Nevertheless, this Ministerial Decision contradicts what the Minister of Interior previously claimed, by overlooking the social and economic reality of Greece the past 11 years. The country has experienced an unprecedented economic crisis since 2010, with complete deregulation of labour relations, unemployment soaring, and the current conditions of economic suffocation due to the pandemic.²⁶ These data are always harsher for immigrants, as evidenced by the official data of ELSTAT: in the last quarter of 2020 the unemployment of third country citizens rose to 28.2%, 13 points above the unemployment rate of Greeks.

²⁵ Generation 2.0 RED, Is naturalization finally abolished?, 27-04-2021, [Μήπως τελικά καταργείται η πολιτογράφηση;](#), available in Greek, last accessed on 27-04-2022.

²⁶ *Ibid.*

It should be highlighted that the new Ministerial Decision applies also to those who have already filed an application under the previous naturalization system. So, quite simply, it excludes not only the vast majority of those who wish to apply for naturalization in the future, but also those who have applied in the past and whose case is pending –including those who have already paid the expensive administrative fee of 550 or 700 Euros prior to 2019.

The organization Generation 2.0 RED has emphasized that the aforementioned decision excludes not only those who wish to apply for citizenship in the future, but also the vast majority of those who have already applied in the past.²⁷

c) Family reunification

There is still a gap in the law in relation to BSPs, which means that in practice only refugees are entitled to family reunification.

According to Article 23 and Article 24 of Law 4636/2019 “on international protection and other provisions” Gazette 169/A/1-11-2019, family members of the beneficiary of international protection who do not individually qualify for such protection are entitled to a renewable residence permit, which must have the same duration as that of the beneficiary. However, if the family has been formed after entry into Greece the law requires the spouse to hold a valid residence permit at the time of entry into marriage, in order to obtain a family member residence permit. This requirement is difficult to meet in practice and may undermine the right to family life, since one must already have a residence permit in order to qualify for a residence permit as a family member of a refugee.

Refugee family members who enter Greece after a successful family reunification cannot apply for the renewal of their residence permit if they reach the age of 18. P.D. 131/2006 provides for a special one-year residence permit until they reach the age of 21. However, they still need a valid residence permit in order to apply for a one-year residence permit before the competent Decentralized Administration of their place of residence.

As reported in the previous national report, a long awaited Joint Ministerial Decision was issued in August 2018 on the requirements regarding the issuance of visas for family members in the context of family reunification with refugees (JMD 47094/2018, Gov. Gazette B/3678/28.08.2018). Among other provisions, this Decision sets out a DNA test procedure in order to prove family links and foresees interviews of the family members by the competent

²⁷ *Ibid.*

Greek Consulate. The entire procedure is described in detail in a relevant handbook of the Ministry of Foreign Affairs. According to the Ministerial Decision, the refugee must pay €120 per DNA sample but until today the electronic fee (e-paravolo) is not available and thus the payment of the fee is not possible. In addition, the DNA kit must be sent from the Forensic Science Department (Διεύθυνση Εγκληματολογικών Ερευνών) that will conduct the test, to the Greek Consulate in the diplomatic pouch of the Ministry of Foreign Affairs. This is a procedure which can be proven lengthy.

In November 2019, the Greek Council for Refugees (reporting through AIDA) supported the first case on a DNA test Procedure in Greece.²⁸ Although an initial positive decision for family reunification was issued, a DNA test has been ordered due to the doubts on the family link expressed by the competent Greek Consulate. In this case, there was no Greek Embassy in the country of origin and the family members had to present themselves at the Greek Embassy appointed as competent for the issuance of the visas, located in another country. However, during the DNA test procedure the visas of the refugee his family members for that country expired. Hence, they had to stay in that country for more than three months, waiting for the procedure to be finalized. In February 2020 the visas were finally issued. However, the family members that arrived in Greece were not able to apply in person within one month upon their arrival, due to COVID-19 measures. The competent RAO made an exception due to force majeure and granted them residence permit as family members of a recognized refugee.

d) Housing

According to Article 34 Law 4636/2019 “on international protection and other provisions”, beneficiaries of international protection enjoy the right to free movement under the same conditions as other legally residing third-country nationals. No difference in treatment is reported between different international protection beneficiaries.

In general terms and according to the law beneficiaries of international protection have access to accommodation under the conditions and limitations applicable to third-country nationals residing legally in the country (Article 33 of Law 4636/2019). According to Article 30 of Law 4636/2019, beneficiaries of international protection should enjoy the same rights as Greek citizens and receive the necessary social assistance, according to the terms applicable to Greek citizens. However, administrative and bureaucratic barriers, lack of state-organised actions in order to address their particular situation, non-effective implementation of the law, and the

²⁸ AIDA, [COUNTRY REPORT GREECE](#), 2020 (June 2021 update), last accessed on 27-04-2022, p. 240-241.

impact of economic crisis prevent international protection holders from the enjoyment of their rights, which in some cases may also constitute a violation of the principle of equal treatment enshrined in Law 4443/2016, transposing Directives 2000/43/EU and 2000/78/EU.

e) Employment

Following the entry into force of the Law 4636/2019 on 1 of January 2020, a 6-month time limit was introduced for asylum seekers' access to the labour market. However, this right is granted if only if no first instance decision has been taken by the Asylum Service within 6 months of the lodging of the application, through no fault of the applicant (Article 53(1) Law 4636/2019; Article 71 Law 4375/2016, as amended by Article 116(10) of Law 4636/2019). The right is automatically withdrawn once a negative decision is issued, which is not subject to an automatically suspending appeal (Article 53(2) Law 4636/2019).

Article 27 of Law 4636/2019 provides for full and automatic access to the labour market for recognised refugees and subsidiary protection beneficiaries under the same conditions as nationals, without any obligation to obtain a work permit.

In practice, both asylum seekers and beneficiaries of international protection face obstacles in the issuance of Tax Registration Number (AFM), which hinders their access to the labour market and their registration with the Unemployment Office (OAED). The procedure for competent Tax Offices to verify refugees' personal data through the Asylum Service takes approximately 2 months according to AIDA.²⁹ In case of a professional (εταιρικό) AFM, the procedure takes more than 3.5 months and requires the assistance of an accountant. Moreover, individuals wishing to register with a Tax Office (Διεύθυνση Οικονομικών Υποθέσεων, DOY) with a view to obtaining AFM are required to certify their residence address through a certificate from a reception centre, an electricity bill or a copy of a rental contract in their name. Accordingly, beneficiaries of international protection who do not hold a residence certificate and/or are homeless are unable to obtain AFM. As a result, they cannot submit a tax declaration or obtain a tax clearance certificate.

Law 4636/2019 abolished article 16 of Law 4540/2018. According to Article 29 of Law 4636/2019, beneficiaries of international protection enjoy equal treatment in reference to the recognition of foreign degrees, certificates and other official titles. BIPs that are unable to provide evidence of their degrees shall enjoy facilitated access to programmes for the evaluation,

²⁹ AIDA, [COUNTRY REPORT GREECE](#), 2020 (June 2021 update), last accessed on 27-04-2022, pp. 248-249.

authentication and verification of their previous education. To this end Article 2 para 2 and article 3 para 3 of EU Directive 2005/36 apply. During the reporting period no relevant Ministerial Decision had been issued for the implementation of this article.

f) Vocational training

Article 16 of Law 4540/2018 was abolished by Law 4636/2019. According to Article 54 of Law 4636/2019 asylum seekers have the same access as Greeks to enrol and attend programmes of vocational training (when vocational training is part of an employment contract, the applicant must fulfil the conditions for access to the employment market under article 53 of the same law). According to para. 2 of Article 54, a Common Ministerial Decision with the specific evaluation procedure for applicants without the necessary documentation will be issued. During the evaluation period no Ministerial decision had been issued.

g) Health

The law provides that, when applying the provisions on reception conditions, competent authorities shall take into account the specific situation of vulnerable persons such as minors, unaccompanied or not, direct relatives of victims of shipwrecks (parents and siblings), disabled people, elderly people, pregnant women, single parents with minor children, persons with serious illnesses, persons with cognitive or mental disability and persons who have been subjected to torture, rape or other serious forms of psychological, physical or sexual violence, victims of female genital mutilation and victims of human trafficking (Article 58 of Law 4636/2019). The assessment of the vulnerability of persons entering irregularly into the territory takes place within the framework of the Reception and Identification Procedure and, since the entry into force of Law 4636/2019, on 1 January 2020, it is no longer connected to the assessment of the asylum application.

Under the reception and identification procedure, upon arrival, the Head of the RIC “*shall refer persons belonging to vulnerable groups to the competent social support and protection institution.*” (Article 39 para. 4 of Law 4636/2019).

Article 55 of the Law 4636/2019 introduced a new a Foreigner’s Temporary Insurance and Health Coverage Number (Προσωρινός Αριθμός Ασφάλισης και Υγειονομικής Περίθαλψης Αλλοδαπού, PAAYPA), replacing the previous Social Security Number (AMKA). PAAYPA is to be issued to asylum seekers together with their asylum seeker’s card. With this number, asylum seekers are entitled to free of charge access to necessary health, pharmaceutical and hospital

care, including necessary psychiatric care where appropriate. The PAAYPA is deactivated if the applicant loses the right to remain on the territory. The provisions of the Law 4636/2019 entered into force since 1 November 2019. However, the necessary mechanism for their implementation was not activated until the beginning of 2020 following the COVID-19 pandemic.

Free access to health care for beneficiaries of international protection is provided under the same conditions as for nationals, pursuant to Law 4368/2016. The new International Protection Law (4636/2019) has not changed the relevant provisions. Despite the favourable legal framework, actual access to health care services is hindered in practice by significant shortages of resources and capacity for both foreigners and the local population, as a result of the austerity policies followed in Greece, as well as the lack of adequate cultural mediators.

h) Social Security

The law provides access to social welfare for beneficiaries of international protection without drawing any distinction between refugees and beneficiaries of subsidiary protection. Beneficiaries of international protection should enjoy the same rights and receive the necessary social assistance according to the terms that apply to nationals, without discrimination (Article 29 and 30 of Law 4636/2019).

Not all beneficiaries have access to social rights and welfare benefits. In practice, difficulties in access to rights stem from bureaucratic barriers, which make no provision to accommodate the inability of beneficiaries to submit certain documents such as family status documents, birth certificates or diplomas, or even the refusal of civil servants to grant them the benefits provided, contrary to the principle of equal treatment as provided by Greek and EU law.³⁰

Below is a list of benefits³¹:

- Family allowance: The family allowance is provided to families that can demonstrate 5 years of permanent, uninterrupted and legal stay in Greece. As a result, the majority of beneficiaries of international protection are excluded from this benefit.

³⁰ Pro Asyl and Refugee Support Aegean, [Rights and effective protection exist only on paper: The precarious existence of beneficiaries of international protection in Greece](#), 30 June 2017, last accessed on 27-04-2022, pp.22-24; ELIAMEP, [Refugee Integration in Mainland Greece: Prospects and Challenges](#), March 2018, last accessed on 27-04-2022, p. 4-5.

³¹ AIDA, [COUNTRY REPORT GREECE](#), 2020 (June 2021 update), last accessed on 27-04-2022, pp.250-251.

- Single mother allowance: Allowance to single mothers is provided to those who can provide proof of their family situation e.g., divorce, death certificate, birth certificate. With no access to the authorities of their country, many mothers are excluded because they cannot provide the necessary documents.
- Single child allowance: The single child support allowance replaced the pre-existing family allowances and is provided explicitly to refugees or beneficiaries of subsidiary protection.
- Birth allowance: The newly established birth allowance is granted to the mother who is legally and permanently residing in Greece and amounts to €2,000 for every child born in Greece. Third country nationals are entitled to receive this allowance if they can demonstrate 12 years of permanent stay in Greece. Exceptionally for the births that will take place in the years 2020-2023 the allowance will be granted to the mother – third country national, if she has been permanently residing in Greece since 2012. The permanent stay is proved with the submission of tax declarations. Hence, the vast majority of beneficiaries of international protection are practically excluded from this benefit.
- Student allowance: Furthermore, beneficiaries of international protection are excluded by law from the social allowance granted to students, which amounts to €1,000 annually. According to the law, this allowance is provided only to Greek nationals and EU citizens.
- Disability benefits: Beneficiaries of international protection with disabilities also face great difficulties in their efforts to access welfare benefits. First, they have to be examined by the Disability Accreditation Centre to assess whether their disability is at a level above 67%, in order to be eligible for the Severe Disability Allowance. Even if this is successfully done, there are often significant delays in the procedure.
- The guaranteed minimum income (ελάχιστο εγγυημένο εισόδημα) formerly known as Social Solidarity Income (Κοινωνικό Επίδομα Αλληλεγγύης “KEA”, established in February 2017 as a new welfare programme regulated by Law 4389/2016) The guaranteed minimum income is €200 per month for each household, plus €100 per month for each additional adult of the household and €50 per month for each additional child of the household, was intended to temporarily support people who live below the poverty line in the current humanitarian crisis, including beneficiaries of international protection. Unfortunately, except for the “guaranteed minimum income”, there are no other effective allowances in practice. There is no provision of state social support for vulnerable cases of beneficiaries such as victims of torture. The only psychosocial and

legal support addressed to the identification and rehabilitation of torture victims in Greece is offered by three NGOs, GCR, Day Centre Babel and MSF, which means that the continuity of the programme depends on funding.

- Uninsured retiree benefit: Finally, retired beneficiaries of international protection, in principle have the right to the Social Solidarity Benefit of Uninsured Retirees. However, the requirement of 15 years of permanent residence in Greece in practice excludes from this benefit seniors who are newly recognised beneficiaries. The period spent in Greece as an asylum seeker is not calculated towards the 15-year period, since legally the application for international protection is not considered as a residence permit.

i) Education

According to Article 51 of Law 4636/2019, asylum-seeking children are required to attend primary and secondary school under the public education system under similar conditions as Greek nationals. Contrary to the previous legal framework, Law 4636/2019 does not mention education as a right but as an obligation.

Facilitation is provided in case of incomplete documentation, as long as no removal measure against minors or their parents is actually enforced. Access to secondary education shall not be withheld for the sole reason that the child has reached the age of maturity. A Ministerial Decision for the latter as foreseen in Article 51 of Law 4636/2019 had not been issued however during the reporting period. Children asylum seekers and BIPs are treated in general as a vulnerable group, without any further distinction.

j) Unaccompanied minors

Law 4554/2018 introduced for the first time a regulatory framework for the guardianship of unaccompanied children in Greek law. According to the new law, a guardian will be appointed to a foreign or stateless person under the age of 18 who arrives in Greece without being accompanied by a relative or non-relative exercising parental guardianship or custody. The Public Prosecutor for Minors or the local competent Public Prosecutor, if no Public Prosecutor for minors exists, is considered as the temporary guardian of the unaccompanied minor. This responsibility includes, among others, the appointment of a permanent guardian of the minor. The guardian of the minor is selected from a Registry of Guardians created under the National Centre for Social Solidarity (Εθνικό Κέντρο Κοινωνικής Αλληλεγγύης, ΕΚΚΑ). Also, the law provides a best interest of the child determination procedure following the issuance of standard operational procedure to be issued. The law also creates the Supervisory Guardianship Board,

which will be responsible for ensuring legal protection for unaccompanied children with respect to disabilities, religious beliefs and custody issues. Additionally, the law established the Department for the Protection of Unaccompanied Minors at EKKA, which has the responsibility of guaranteeing safe accommodation for unaccompanied children and evaluating the quality of services provided in such accommodation.

However, since the adoption of Laws 4686/2020 and 4760/2020, the authority responsible for the accommodation of unaccompanied minors is the Special Secretariat for the Protection of Unaccompanied Minors of Ministry of Migration and Asylum. In practice, the system of guardianship was still not operating given that the relevant enacting legislation had not been adopted. By the end of March 2021 and the cut-off date of the reporting period the system was still not operating.

- Policy developments

a) Housing and employment

According to the Ministry of Migration Policy, the “HELIOS 2” programme, was launched on 1 June 2019 to be run until 2021 and included a number of integration actions and the provision of a rental allowance for 5,000 recently recognised refugees for a period of 6 months.³² Recognised refugees benefiting from 6 months of accommodation in the ESTIA scheme and 6 months of rental allowance will have access to the Social Welfare system if they remain unemployed.

As of June of 2021, HELIOS is in the process of being terminated and waiting for financing. It has not been an accommodation programme per se but part of a larger integration policy that promotes integration by providing rental subsidies for a period of 6 - 12 months to eligible beneficiaries who must secure a rental agreement under their name, as well as attend language and employability courses offered. Securing a rental agreement without a job is very difficult, since the eligibility criteria for enrolment to HELIOS exclude a big portion of beneficiaries of international protection. Consequently, homelessness is increasing in the last months.

³² Ministry of Migration and Asylum, [Project HELIOS](#), last accessed on 27-04-2022. See also, [Refugees International, Blocked at Every Pass: How Greece's Policy of Exclusion Harms Asylum Seekers and Refugees](#), 24-11-2020, last accessed on 27-04-2022.

According to IOM statistics, 26,665 beneficiaries of international protection had been registered for the HELIOS programme by 5 February 2021.³³ 34% were previously residents in an ESTIA place, 33% in mainland camps, 18% in hotels and 16% in RIC. In December 2020 in a declaration signed by 74 organisations it was stated that around 11,000 people who were granted asylum were notified amidst a global pandemic that they were going to face forced exits from apartments for vulnerable people (ESTIA), hotel rooms under the Temporary Shelter and Protection program (FILOXENIA), accommodation in camps on the islands and on the mainland.

Furthermore, according to "Pro Asyl and Refugee Support Aegean" as of early February 2021, as many as 10,405 recognised refugees resided in the country's refugee camps alone, while 6,199 beneficiaries of international protection resided in ESTIA at the end of 2020. Persons residing in ESTIA accommodation are being served complaints (εξώδικα) by the organisations operating apartments, threatening them with legal action if they fail to vacate the premises. Media reports confirm that hundreds are being left on the street in February 2021 amid the COVID-19 pandemic and harsh winter conditions. At the end of the month, status holders became homeless yet again across the territory, after being requested to leave their places in hotels running under the FILOXENIA programme.

There is no available targeted support for entrepreneurs. The New Strategy for Integration, adopted in July 2019 does however contain a policy measure for the promotion of start-up businesses and entrepreneurship. The action aims to facilitate and inform third-country nationals in order to promote start-up businesses through legislative measures on a) issues of entry and stay (visas and residence permits) b) simplifying the procedure for establishing start-up businesses of "ethnic character" and c) on providing for joint funding from banks and governmental grants. Policy measures aimed at youth and their education on business activities are also foreseen. Commerce Chambers will provide counselling on how to establish and ensure the proper and productive functioning of start-ups to third-country nationals.

A report drafted by the NGO Faros³⁴ indicates, based on a series of interviews that the New Strategy for Integration has not fully developed on the matter of entrepreneurship since its implementation. Entrepreneurship remains mostly inaccessible for most of the refugees:

³³ AIDA, [COUNTRY REPORT GREECE](#), 2020 (June 2021 update), last accessed on 27-04-2022, pp. 245-248.

³⁴ Faros, [An Abundance of Unleashed Potential](#), 2020, last accessed on 27-04-2022.

"While entrepreneurship is a recurring buzzword around refugees, our study did not confirm the high hopes frequently associated with it (...) On top of complex business registration processes and the acquisition of permits, refugees face the previously mentioned language barriers. Additionally, access to start-up financing, a critical issue for native entrepreneurs, is even more difficult for refugees since they lack collateral for loan acquisitions. Thus, the challenges to accessing formal employment, as mentioned before, are even magnified in self-employment. Based on our research, self-employment of refugees most often takes place in low-skilled areas, with refugees owning restaurants, mini markets or cafeterias. This is in line Cedefop (2020). Developments in vocational education and training policy in 2015-19: Greece. Cedefop monitoring and analysis of VET policies. Developments in vocational education and training policy in with findings by previous studies, where 87% of respondents who reported to be "self-employed" had not exceeded secondary education. While there is a wide spread of entrepreneurship programs across NGOs, seeking to provide refugees with necessary business skills to run a venture, our study did not indicate a high effect of these programs. Across our interviews, no expert had made experiences with successful self-employment of refugees. An exception was the story of a refugee with plans of becoming an entrepreneur, whose plans of founding a cosmetics company had, at the time of our study, been halted by COVID-19. Additionally, refugees appear to have a limited preference for entrepreneurial careers. In our survey, only 8% of respondents planned to become self-employed as the next career step. This confirms existing research, which did not find indications of high entrepreneurial spirit amongst refugees".

b) Education

In October 2019, the estimated number of refugee and migrant children in Greece was 37,000, among whom 4,686 were unaccompanied. Out of the number of children present in Greece, it was estimated that only a third (12,800) of refugee and migrant children of school age (4-17 years old) were enrolled in formal education during the school year 2018-2019. The rate of school attendance was higher for those children living in apartments and for unaccompanied children benefitting from reception conditions (67%).

For the school year of 2020-2021,³⁵ conflicting data provided by the Ministry of Education, seem to highlight either a 32.52% decrease in the number of children enrolled to education compared

³⁵ Greek Ombudsman, Ministry of Education and Religious Affairs, "[Reply with respect to the findings regarding the educational integration of children residing in facilities and RICs of the Ministry of Migration & Asylum](#)", 21-04-2021, available in Greek, last accessed on 27-04-2022.

to the aforementioned 2019 estimates, or a 12.67% increase in the number of children enrolled to education compared to the same estimates.

Namely, as per the response of the Deputy Minister of Education to a Parliamentary question in March 2021, there were 8,637 children enrolled to education, while as per an April 2021 reply of the Ministry to relevant findings of the Greek Ombudsman, there were 14,423 children enrolled to education by 21 February 2021.

In both cases, reference is made to the same “My school” database, albeit in the latter case, it is specified that due to reasons inter alia stemming from the mobility of the specific population (e.g., due to change of status or a transfer decision), relevant “accurate quantitative data are not guaranteed”.

According to a report by RSA, even though 7,769 (90%) of the 8,637 children enrolled as of March 2021 attend primary and secondary education classes in person, professionals interviewed estimate a deterioration of the situation and stress that actual school attendance is at a dramatic low.³⁶

c) Language learning and social orientation

A pilot programme of Greek language courses funded by the Asylum, Migration and Integration Fund (AMIF) announced in January 2018 was included in the HELIOS project and has been implemented since June 2019 by IOM and its partners. Moreover, the Municipality of Athens regularly organises Greek language courses for adult immigrants, as well as IT seminars, for, among others, adult refugees.³⁷ Language courses and social orientation are included in several actions within the National Strategy for Integration, but so far only the HELIOS 2 is being implemented. No state-funded language courses appear to exist in Greece.

d) Raising awareness and building bridges

The National Strategy for Integration includes measures for raising awareness. The HELIOS 2 programme which is being implemented till August 2021 includes: sensitization of the host community mainly through the organization of workshops, activities and events and production

³⁶ RSA, [Excluded And Segregated The Vanishing Education Of Refugee Children In Greece](#), 2021, last accessed on 27-04-2022.

³⁷ City of Athens, Educational Programmes, ‘[Εκπαιδευτικά Προγράμματα](#)’, available in Greek, last accessed on 27-04-2022.

of a nationwide media campaign to create exchange occasions between the hosting and the hosted communities, highlighting the value of the integration of migrants into the Greek society.

The National Strategy for Integration does include actions that require local authorities to set up strategies. To this end it is important to highlight the work of the Coordinating Centre on Issues related to Refugees and Migrants of the City of Athens. Since the previous update, more municipalities have joined the Coordinating Centre on Issues related to Refugees and Migrants as part of the Cities Network for Integration.³⁸

CNI was formed in January 2018 on the basis of a memorandum of understanding (MoU) between the municipalities of Athens and Thessaloniki. The MoU paves the way for a common cooperation framework between CNI members in the fields of know-how exchange, capacity building, promotion of good practices, joint policymaking at European, regional and local level, fundraising and programming.

Since April 2020, the UN High Commissioner for Refugees (UNHCR) and the International Organization for Migration (IOM) have been jointly supporting the work of the Cities Network for Integration on the basis of trilateral cooperation with the Municipality of Athens. The two international organizations, based on the priorities set by the participating municipalities, provide the necessary technical means to develop mechanisms and procedures that promote initiatives with long-term benefits for both host societies and refugee/ migrant populations. The IOM has been supporting the CNI since December 2018, as part of IOM's 'Durable Solutions' program. To date, 18 municipalities have joined the Cities Network for Integration: Athens, Chania, Delta, Agios Dimitrios, Heraklion, Thessaloniki, Ioannina, Kalamaria, Karditsa, Katerini, Larissa, Livadia, Neapoli - Sykees, Nea Filadelfeia / Nea Chalkidona, Piraeus, Telos, Trikala and Tripoli.

A manual with best practices has also been published by the CNI and some municipalities in Greece have established councils for the integration of migrants (including BIPs) (indicatively Municipality of Athens, Municipality of Thessaloniki, Municipality of Pavlos Melas, Municipality of Ioannina, Neapoli, Peiraias etc.).

It should be noted as of June 2021, 13 municipalities throughout Greece have established Refugee and Migrant Integration Councils with the support of UNHCR.³⁹ Immigrant Integration

³⁸ City of Athens, [Cities Network for Integration](#), last accessed on 27-04-2022.

³⁹ Data retrieved from the [Ministry of Migration and Asylum](#), last accessed on 27-04-2022.

Councils are consultative bodies in which refugees can communicate their needs directly to the municipal authorities.

Mentorship Programmes run by NGOs in Greece

There is no available data on publicly funded mentorship schemes for beneficiaries of international protection. In fact, no such mentoring scheme exists. Social integration is left to the NGOs.

Many NGOs offered mentorship programmes for refugees in Greece during the reporting period) with national and EU funding:

- IRC Hellas in collaboration with the organization Women On Top and the support of Webhelp through the Think Human Foundation offered women, aged 16 and over, with a refugee or migrant background participation in a free 6-month mentoring program (January 2021-June 2021). The programme aims to help young female BIPs face any challenges related to their professional empowerment and development by sharing experiences and knowledge.

(<https://www.accmr.gr/el/open-calls/1068-workshop-invitation-empowering-women-in-times-of-transition.html>)

- The Orange House run by the NGO ZAATAR and offering a House for refugees in Athens offers medical, psychosocial and education assistance as well as a mentoring program for unaccompanied minor children. It also offers shelter and assistance to LGBTQ refugees and Legal Aid in cooperation with NGO PRAKSIS.

(<http://zaatarngo.org/projects/the-orange-house-community-center/>)

- GCR - Social Unit: The mission and vision of GCR's social unit is to empower and enable the integration of asylum seekers and recognized refugees so they can achieve a sense of belonging and live with dignity. The intercultural centre PYXIDA is a welcoming and safe space for the refugees who wish to begin the long and challenging journey to integration. PYXIDA offers Greek and English language classes, skills-based courses, and social recreational programs. Importantly, when refugees are ready and capable of paid work, they are connected to GCR's employment Office which works closely with an extensive network of employers and recruiters that can offer refugees jobs and mentoring programs for refugee job seekers.

(<https://www.gcr.gr/en/our-work/our-services/social-unit>)

- The REWIP- Refugee Empowerment and Work Integration Programme is an EU-funded project aiming at supporting young migrants, refugees and asylum seekers (aged 18 – 30) that arrive in a new country of residence in the EU and wish to make their first steps towards achieving work integration and as an extension, social integration. REWIP aims at achieving this goal by initiating and facilitating volunteering and mentoring opportunities for young migrants, refugees and asylum seekers who wish to work voluntarily in a local business for a limited amount of time, learn a new profession or further develop an already familiar one, as well as liaise meaningfully with a professional mentor who can guide them in their

professional endeavours. The project is implemented by the University of Piraeus in collaboration with Stimuli, SolidarityNow, Ethelon, NewBees, and CESIE.
(https://www.rewip.eu/?page_id=659&lang=el)

d) Good practices

For the NIEM project the practices included in the following table were reported as good practices:

Name/description of the good practice (incl. weblink if possible)	NIEM dimension & indicator(s)	Key points
1. HELIOS 2 Project – Monitored by the Greek Ministry of Migration and Asylum and implemented by the IOM. Focuses on the integration of beneficiaries of international protection by providing services or activities such as: accommodation support, integration-related courses (e.g., learning the Greek language, courses in professional skills' development, etc.), professional counseling to enhance job readiness, raise awareness in host communities and promote social cohesion. https://migration.gov.gr/en/migration-policy/integration/draseis-koinonikis-entaxis-se-ethniko-epipedo/programma-helios/ Start date: July 2019 - ongoing	Accommodation, Education, Employment, Vocational training, social orientation, Building bridges	The HELIOS 2 project is a fully developed project addressed to beneficiaries of international protection as well as their families. It covers the needs of beneficiaries of international protection recognized as beneficiaries of international protection after 01/01/2018, officially registered and residing, in the accommodation facilities of the official reception system when they received a decision granting them international protection (such as the ESTIA program, Filoxenia program, Open Facilities, Reception and Identification Centers, etc.). It was developed to provide accommodation support to 5,000 households (est. 11,200). All beneficiaries of international protection can benefit from individual sessions for professional counseling which include: identification of needs and interests of participants, profiling of participants' skills based on the EU Skills Profile Tool, compensation for costs associated with acquiring various certifications (e.g., Greek language certificate, drivers' license, English language certificate, ECDL (computers), and others), "career days", networking with the private sector (employers), information concerning the Greek Manpower Employment Organisation and information pertaining to the rights and obligations of employees and employers in Greece. Further, the project also undertakes activities to help inform and raise awareness in local communities, professional unions, and among employers.
2. Cities Network for Integration - The Cities Network for Integration (CNI) is an intermunicipal network led by municipalities across Greece that jointly design and exchange good practices in the field of integration of migrants and refugees. https://www.accmr.gr/en/networks.html Start date: January 2018 - ongoing	Overall policies, integration building bridges	CNI was formed in January 2018 on the basis of a memorandum of understanding (MoU) between the municipalities of Athens and Thessaloniki. The MoU is the basis for a common cooperation framework between CNI members in the fields of know-how exchange, capacity building, promotion of good practices, joint policymaking at European, regional and local level, fundraising and programming. The Committee of Mayors sets out the strategic priorities of the Network, while the Local Working Groups involving staff with significant experience in integration issues, engage in the process of identifying challenges and developing new initiatives. Since April 2020, the UNHCR and IOM have been jointly supporting the work of the Cities Network for Integration on the basis of trilateral cooperation with the Municipality of Athens. The two international organizations, based on the priorities set by the participating municipalities, provide the necessary technical means to develop mechanisms and procedures that promote initiatives with long-term benefits for both host societies and refugee/migrant populations. To date, 18 municipalities have joined the Cities Network for Integration: Athens, Chania, Delta, Agios Dimitrios, Heraklion, Thessaloniki, Ioannina, Kalamaria, Karditsa, Katerini, Larissa, Livadia, Neapoli - Sykees, Nea Filadelfeia / Nea Chalkidona, Piraeus, Telos, Trikala and Tripoli.
3. Migrant Integration Centres – First established through Law 4368/2016, MIC have been established throughout Greece in various municipalities in order to provide specialized	Language learning, Social Orientation, Employment, Building bridges	MICs provide inter alia, lessons in Greek language, history, and culture which are offered to adults who are either migrants or beneficiaries of international protection; Intercultural activities which facilitate the co-existence between third-country children/young people and native children/young people; Activities that facilitate third-country nationals' access to the job

services to third-country nationals, including beneficiaries of international protection. The first MIC was established in 2017 in Athens and now there are MICs in 10 municipalities in Greece.

<https://migration.gov.gr/en/kentra-entaxis-metanaston/>

Started in 2017 – ongoing

(The link above contains links to all Municipal MICs operating throughout Greece)

market.

The personnel of MICs consists of Intercultural Mediators (recent addition) who are familiar with the language and ethnic or cultural characteristics of migrant and refugee communities, social workers, with expertise in migrants or minorities or socially excluded individuals, legal advisors, with expertise in migrant or labour law, psychologists, trained in post-traumatic stress disorders and in catering to the needs of vulnerable individuals (e.g., women, children, special needs individuals, etc.).

2.3. International Protection in the COVID-19 era

As noted above, the reception of BIPs was affected by the COVID-19 pandemic and even before that.⁴⁰ In February 2020, the Greek Authorities decided to suspend the operation of the Asylum Services following an incident at the Greek-Turkish borders at Evros. This suspension was then extended due to the COVID-19 pandemic. The Asylum Service, the Regional Asylum Offices (RAO) and the Autonomous Asylum Units (AAU) had all suspended the reception of the general public between 13 March and 15 May 2020.⁴¹ During this period, applications for international protection were not registered, interviews were not conducted, and appeals were not registered. On the basis of a ministerial decision, the asylum seekers' cards that were to expire between 13 March 2020 and 31 May 2020 were renewed for six months from the day of the expiry of the card.

The Asylum Service resumed its operation on 18 May 2020, which included the service of first instance decisions and the lodging of appeals. Since 18 May 2020, a number of administrative procedures (e.g., applications to change: the address, the telephone number, personal data, the separation of files, the procurement of copies from the personal file, the rescheduling and the prioritisation of hearings, the provision of legal aid etc.) could take place online. Interviews scheduled to take place during the suspension of the work of the Asylum Service (13 March 2020 - 15 May 2020) were rescheduled. With the exception of persons under administrative detention, following the resumption of the operation of the Asylum Service, no registration of new asylum applications took place by the end of May 2020. The extension of international protection applicant cards was further extended with relevant ministerial decisions in 2020.

After the second wave of COVID-19 cases in Greece, *“in order to protect public health and impede the further spread of the COVID-19 virus”*, the Director of the Asylum Service decided to suspend the operation of RAOs in the Attica region from 6 October 2020 to 9 October 2020. This suspension was extended until 16 October. Moreover, between 7 and 30 November 2020, new measures against COVID-19 were introduced for the entire country. During this period, even though *“programmed interviews and registrations via Skype took place according to schedule”*, full registrations of asylum applications were not conducted except for those of very vulnerable applicants. According to Laws 4764/2020 and 4790/2021 the validity of asylum

⁴⁰ For an analysis of all the national measures taken during the pandemic see: FRA, Coronavirus COVID-19 outbreak in the EU Fundamental Rights Implications, [Greece](#), 06-04-2022, last accessed on 27-04-2022; FRA, Coronavirus pandemic in the EU – Fundamental Rights Implications, [Greece](#), 03-11-2020, last accessed on 27-04-2022.

⁴¹ AIDA, [COUNTRY REPORT GREECE](#), 2020 (June 2021 update), last accessed on 27-04-2022, pp.20-21.

seekers' cards was further extended; in the beginning until 31 March 2021 and then until 30 June 2021. Thus, applicants of international protection were not required to renew their cards until 30 June 2021.

Furthermore, in 2020, access to education was further challenged by a number of factors, also related to COVID-19, which led to a mass exclusion of refugee children from the Greek education system. According to 33 civil society organisations and with respect to children staying in mainland camps, *"[i]n some places the issues observed have to do with inconsistent interpretation of COVID-19 related movement restriction policies by the Greek authorities, which ends up discriminating against children who, as a result, are not being allowed to leave these camps [in order to attend school]. At the same time, during the lockdowns, due to the lack of necessary technical infrastructure for online learning at the camps, refugee and asylum-seeking children are further excluded from the education process"*.⁴² The lack of transportation, understaffing of reception classes and negativity and/or reported reluctance by some local communities, as well as refugee families, to the potential of children attending school, were also amongst reported factors hindering refugee children's access to education for the school year of 2020-2021. Particularly in what concerns mainland camps, even though slightly more than 62% of school-aged children living in the camps were formally enrolled to education (6,472 out of 10,431 children), only 14.2% (or 1,483) were actually able to attend it, as per findings of the Greek Ombudsman in March 2021.⁴³

COVID-19 also worsened the already precarious situation for the beneficiaries of international protection. Evictions from homes were executed in the middle of the pandemic and the overcrowding conditions in the camps and especially in the "hotspots" posing a high health risk that has been denounced by many organisations. COVID-19 had not softened housing restrictions on public health grounds.

COVID-19 had a very negative impact on the Greek labour market that was far from being recovered from the 2008-2015 economic crisis. The impact has been particularly harsh on the beneficiaries of international protection because of their vulnerability. Programmes for vocational training were interrupted, the application for the necessary documents delayed and the abolition of jobs in the labour market made the access to a job extremely difficult.

⁴² CARTITAS, [Open letter: All children have the right to go to school. Do not take that away from them](#), 09-03-2021, last accessed on 27-04-2022.

⁴³ Greek Ombudsman, Ministry of Education and Religious Affairs, ["Reply with respect to the findings regarding the educational integration of children residing in facilities and RICs of the Ministry of Migration & Asylum"](#), 21-04-2021, available in Greek, last accessed on 27-04-2022.

During the first waves of the COVID-19 pandemic, the Greek Government introduced emergency benefits for the most vulnerable groups (namely, low-income families with children). Beneficiaries of the Social Solidarity Income, including beneficiaries of international protection were also included in the emergency benefits.⁴⁴

COVID-19 led to successive lockdowns and the closure of many public buildings which has made it very difficult for NGO's, which are the main providers of social orientation and language courses, to continue their tasks. Fortunately, in mid-2021 some of those projects were resumed.

Finally, on a positive note and in the case of unaccompanied children (UAC), the COVID-19 pandemic had a positive outcome because it motivated the Greek authorities to move forward with the relocation of UAC from the hotspots to the mainland and also to other EU countries.

⁴⁴ FRA, [Franet National contribution to the Fundamental Rights Report 2021](#), Greece, last accessed on 27-04-2022, p. 51.

3. Moving forward

3.1. Recent developments in Greece affecting BIPs

As mentioned above, the final phase of the NIEM project, Evaluation 2, was limited to a certain period (April 2019-March 2021). However, given the date of publication of the present report, recent developments are also included, in order to assist the reader to stay up to date with the most current situation for the integration of BIPs in Greece.

Below are a number of crucial issues related to BIPs and asylum-seekers:

1) Reports on Systematic Pushbacks

A report published by the human rights group condemns Greece for violently and illegally detaining refugees and migrants before pushing them back to Turkish territory, in violation of human rights obligations under international and European Union law. Amnesty International has been the latest humanitarian organization to release a report, on June 23, 2021 about what it says is "*new evidence of torture, ill-treatment and illegal pushbacks of refugees and migrants to Turkey by the Greek authorities.*"

The report "Greece: Violence, lies and pushbacks" revealed 21 pushback incidents that affected about 1,000 people, as well as other abuses occurring between June and December 2020. Among the people Amnesty spoke to were a recognized refugee and a registered asylum seeker who had been living in mainland Greece for almost a year, but who were apprehended and pushed back by Greek authorities. Amnesty International has joined organizations like Human Rights Watch (HRW) to call on both Greek border forces and the EU border control agency Frontex to investigate and address "*abuse against migrants at external borders.*"

On June 23, 2021 HRW also released a report on external EU borders in Greece, Croatia, and Hungary, saying that Frontex needed to be more "accountable and transparent." Greek authorities not only push back refugees in border areas, but also detain them far inside the mainland before returning them to the Evros region, which is illegal. Adding to compelling evidence by international human rights bodies, civil society, and journalists, the new report that primarily focuses on incidents in the Evros region substantiates that pushbacks have become Greece's de facto policy of border management. The Amnesty's Report also draws attention to the regularity and resemblance of violation patterns. Most of the interviewees have been subjected or witnessed violence enacted by both uniformed Greek officials and men in civilian clothing. Men were often subjected to humiliating and violent naked searches, at times when women and children were present. Some of the documented incidents amounted to torture, due to their severity and humiliating or punitive intent. The report concludes: "*The EU and its member states should take urgent, effective measures to ensure that Greece stops violating the rights of refugees and migrants at its borders. This should include the launch of infringement proceedings against Greece and the creation of an effective, independent monitoring mechanism for violations of human rights at the borders.*" In a joint statement from 18 June, 2021 the Greek Helsinki Monitor (GHM) and the World Organisation Against Torture (OMCT) called on Greek authorities to end and promptly investigate pushbacks, referring to 147 cases documented by GHM involving more than 7,000 individuals.

In regards to the testimonies of people interviewed on their treatment at the Turkish border, the narratives were mixed. Some pointed out that after being pushed back from Greece, Turkish authorities provided assistance. Other testimonies, to the contrary, gave account of severe abuse from Turkish border guards. According to the report, this provides "*an alarming insight into continued political tensions between Turkish and Greek border authorities in the Evros region. People continue to be used as pawns in a political game, at times being "ping-ponged" back and forth across the river, unnecessarily putting the lives of children and adults at risk.*"

The report was published a day before EU leaders met in Brussels to discuss, among other things, the migration situation along

various routes and relations with Turkey. Proposals for EU funds for Turkey that were leaked ahead of the summit call for €3bn from the EU budget to fund refugee aid and migration management in Turkey, with an unspecified part of the money earmarked for border control. Speaking to the Guardian, ECRE director Catherine Woollard expressed her concerns that any funding for border control could prevent people from reaching safety and leaving Syria: “There is a high risk that EU funds are used to support activities that may lead to refoulement [forcible return] or other violations, if a chunk of the money is earmarked for border management and border control,” adding that support should focus instead on improving the Turkish asylum system and the long-term economic and social rights of refugees in Turkey, the country hosting the highest number of refugees globally. Furthermore, she emphasized that *“Turkey in a way is able to ask for whatever it wants from the EU and is also able to act in any way that it wants because of the dependency created by the EU-Turkey deal.”*

In mid-June, a Dutch journalist reporting on the inhumane conditions that people on the move face in Greece and her Afghan translator, an asylum seeker, were arrested on the Greek island of Hydra because the journalist had provided shelter to the young man. Reportedly, the journalist has to appear in court in October and faces a fine or imprisonment.

Sources:

AmnestyInternational: https://www.amnesty.eu/wp-content/uploads/2021/06/Greece_Violence.Lies_Pushbacks_AI-Report-22062021.pdf

<https://www.amnesty.org/en/latest/news/2021/06/greece-pushbacks-and-violence-against-refugees-and-migrants-are-de-facto-border-policy/>

Guardian: <https://www.theguardian.com/world/2021/jun/23/eu-proposal-to-fund-turkey-border-control-could-lead-to-syrian-refugees-forced-return>

AIDA Country Report: Greece, June 2021: https://asylumineurope.org/wp-content/uploads/2021/06/AIDA-GR_2020update.pdf

ECRE, ASYLUM IN GREECE: A SITUATION BEYOND JUDICIAL CONTROL?, June 2021: <https://www.ecre.org/wp-content/uploads/2021/06/ECRE-Legal-Note-9-on-Asylum-in-Greece-A-Situation-Beyond-Judicial-Control-June-2021.pdf>

2) Refugee children’s lack of access to the educational system

On 13th September, 2021, Human Rights Watch issued a press release according to which the Greek government should urgently reform discriminatory policies so that children seeking asylum can go to school during the school year of 2021-2022. According to the data presented by this international human rights organization, only one in seven children living in camps was able to attend school in the last school year (2020-2021), and the authorities should immediately hire teachers, arrange school transportation and remove measures that block asylum-seeking children from school under the pretext of the Covid-19 pandemic. There is no doubt that Greece’s failure to respect asylum-seeker children’s right to education violates EU directives, which require all EU member states to integrate asylum-seeker children into their national school system within three months of identification. The European Commission, which has given billions of euros to Greece for “migration and refugee issues management” including education, routinely takes measures against EU member states that do not fulfill their obligations under EU law, and therefore it is highly possible that it will compel Greece to end its noncompliant, discriminatory policies in this field, in order to protect the rights and futures of thousands of children. However, it is noteworthy that the Greek government did not fix access to education for refugee children before the beginning of the current school year.

Moreover, according to the decision of the European Committee of Social Rights of the Council of Europe, an independent body that monitors and adjudicates compliance with the European Social Charter, Greece appears to be violating the rights of asylum-seeker children, including the right to education of children on the Greek islands where new arrivals from Turkey are contained. Greece did not put in place the “immediate measures” to “ensure access to education” that the Committee had indicated as necessary in May 2019, the decision says.

In addition, the Greek Ombudsman for children’s rights reported in April 2021 that more than 10,400 school-age children seeking asylum in Greece live in camps on the mainland and the Aegean islands, but 86 percent of these children were not attending school in early 2021. According to the UN and government data, during the 2019-2020 school year, a total of 31,000 school-age refugee

children were living either inside or outside the camps, but only about 13,000 were enrolled. The government does not publish enrollment figures. Children seeking asylum in Greece are “severely discriminated against” by persistent delays in launching classes for children who do not speak Greek, the Greek Ombudsman reported. Every year, the classes are delayed. In 2019 they had started in November.

According to the humanitarian group “Refugee Support Aegean”, in 2020 the Ministry of Education waited until December 15 to publish calls for hundreds of teaching positions needed for classes in the academic year that began in September and in some areas no teaching positions had been posted by the beginning of the year.

Greek regional authorities are responsible for providing transportation from camps to schools but failed to provide any from many mainland camps for months after the start of the school year in 2020-21 and in previous years, according to the Ombudsman, parents and staff of child protection organizations interviewed.

Barriers to education were exacerbated for all children in Greece by restrictions imposed to limit the spread of Covid-19. In-person schooling was halted on March 10, 2020 and partially restarted in mid-May before the summer holidays in June. The start of the 2020-21 school year was delayed by one week, until September 14, high schools provided only distance learning until February 2021, and all schools in the country were closed for most of the period from November 2020 to February 2021.

Asylum-seeker children were disproportionately affected by these measures. Even when schools were open for Greek children, children in camps across Greece could not attend. Beginning in March 2020, officials locked down camps in response to relatively small numbers of Covid-19 cases, and did not allow schoolchildren to leave. Government decisions about Covid-19 measures allowed camp managers to lock down camps but did not address children’s access to education, which is compulsory until the age of 15. Camp managers generally want kids to attend schools, but local politicians do not, and some officials had arbitrarily refused to allow children in camps to enroll.

About 480 children in Malakasa camp were unable to enroll the previous year because local officials said there were “not enough classroom spaces,” as the Ombudsman reported. Local officials refused to let children from Ritsona camp enroll in schools nearby claiming that they do not have the money for [school] heating, or that they would need more janitors. In Ritsona camp, from January to September 2020, about 850 children were left waiting for school.

When schools were physically closed, children in camps had almost no access to distance learning due to the lack of Wi-Fi and necessary devices. There are supposed to be Wi-Fi hotspots in camps, but none of them was working, while the Education Ministry did not provide even one single laptop to refugees.

The EU says it has allocated €3.45 billion (US\$4.12 billion) in “migration management” funding to Greece since 2015, including education projects, as well as €625 million in support for inter-cultural schools. Separately, in 2020 the EU helped finance an additional €816 million (US\$975 million) of Greece’s national education budget, including for refugee children. The EU has shifted funding from non-governmental groups and UN agencies to the Greek government directly, but Greece has failed to spend substantial amounts of the EU support it received for refugee integration.

In a positive note, in June 2021 UNICEF and Greece agreed on a plan to provide all school-age refugee children with formal and non-formal education over three years, beginning in September 2021. The plan, based on a proposal by Theirworld, a global education charity, is contingent on €34 million (\$40.3 million) in funding, or roughly €1 per child per day.

Some local officials have proposed opening schools in camps instead of allowing children to attend public schools, which would deny the children an opportunity to integrate or to have a regular respite from the grim conditions of the camps. According to Human Rights Watch, Greece should welcome children into the national education system, as EU and Greek law require and in compliance with the best-interests-of-the-child principle.

It is obvious that the European Commission should reconsider its support to other projects in Greece that could limit children’s access to quality education, such as the construction of new, closed camps in remote locations on the islands, building concrete walls around camps, and plans to build walls and fences around 24 more mainland camps.

The Greek government has repeatedly promised to provide education for all children without discrimination. The future of tens of thousands of children who fled to Europe for safety depends on the decisions taken now by Greek and European Commission officials.

Sources:

http://tdh-europe.org/files/files/EU%20Funding%20%26%20Integration%20brief_Greece%28EN%29%281%29.pdf

<https://theirworld.org/news/greece-plan-to-get-every-refugee-child-in-school>

<https://www.hrw.org/news/2020/06/12/greece-again-extends-covid-19-lockdown-refugee-camps>

3) Pushback Claims Probed without Independent Bodies, Pushbacks Continue as Reports of Refoulement from Turkey Emerge

Pushback Inquiry Kept Internally

The Greek government is considering tasking a transparency body with pushback investigations without including representatives of independent bodies or organisations. Systematic pushbacks from Greece continue as do reports of refoulement from Turkey. 26 NGOs urge Greek authorities to “disburse belated payments of cash assistance and ensure food provision” to deprived asylum seekers and refugees.

In response to demands from the European Commission for Greece to establish a human rights monitoring mechanism, the Greek government is examining the possibility of tasking the National Transparency Authority with the role. However, while representatives of the Migration Ministry, court officials and teachers would participate in such mechanism, reportedly no independent bodies or organisations would be included. The Greek government recently imposed heavy restrictions on NGOs that act in the areas of competence of the Greek coast guard, preventing efficient and independent oversight of the agency’s conduct.

Pushbacks Continue as Reports of Refoulement from Turkey Emerge

Meanwhile, pushbacks continue to occur on a daily basis, according to the Aegean Boat Report, 384 life rafts carrying 6,659 “victims of cruel and inhuman behaviour by the Greek government” have been found adrift in the Aegean Sea since March 2020. The latest incident documented on 17 October 2021 involves 23 people, including five children, of which 22 were pushed back by the Hellenic Coast Guard after arriving to the Greek island of Ikaria. Survivors of pushbacks in the Evros region have reported a trend of “third country nationals working with Greek authorities in violently expelling people from the country” to Border Violence Monitoring Network (BVMN). Pakistani, Afghan, Syrian, Iraqi or Moroccan nationals have allegedly been used as boat-drivers on dinghies and operational support for Greek authorities during pushback operations with the promise legal papers in exchange. According to BVMN, the exact relationship between authorities and third country nationals is difficult to assess. Though it remains unclear if promised compensations are duly exchanged, given: “the repeated assertion of this practice, it appears that the Greek authorities are operating some form of exploitation over people on the move which plays on the lack of access to asylum in the country”.

Refugee Support Aegean and Greek Council for Refugees recently filed an appeal before the High Administrative Court against the Joint Ministerial Decision designating Turkey as a safe third country for citizens of Syria, Afghanistan, Somalia, Pakistan and Bangladesh. On 15th October, 2021 Human Rights Watch published testimonials of Afghan nationals pushed back to Iran by the Turkish army in groups of 50–300 people at the time, some after severe beatings. “Turkish authorities are denying Afghans trying to flee to safety the right to seek asylum,” said Belkis Wille, senior crisis and conflict researcher at Human Rights Watch, adding that: “Turkish soldiers are also brutally mistreating the Afghans while unlawfully pushing them back”.

Sources:

<https://www.ekathimerini.com/news/1169960/transparency-authority-may-probe-pushback->

[claims/?fbclid=IwAR3TYDaQ1da2qJwj4nC_qo3dP-rDoYhmEuLIh1AQURWQcc34yHepmjd59Rk](https://aegeanboatreport.com/2021/10/10/not-in-my-name/)
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<https://ecre.org/greece-pm-unapologetic-over-policy-of-violent-illegal-tactics-greek-authorities-announce-training-of-libyan-coast-guard-ngos-challenge-decision-to-define-turkey-as-safe-third-coun/>
<https://ecre.org/greece-renewed-demands-for-human-rights-monitoring-pushbacks-continue-with-ngos-oversight-restricted-refugee-children-risk-exclusion/>

4) An overview of the situation of new closed structures for asylum seekers in Greece

There is no doubt that the situation prevailing in the reception areas of asylum seekers upon their arrival to a given country affects their capacity for social inclusion. In Greece in 2021, a stable and rapid replacement of open structures by closed structures began, with the aim of discouraging the arrival of new asylum seekers. Thus, until almost the end of 2021, the execution of the programme of construction of reception and identification structures on the islands continued, despite the reduction of refugee and migration flows in the last year. The structures in Samos, Kos and Leros are already operational. By the end of 2022, the construction of the new camps in Lesbos and Chios is expected to be completed and an upgrade and expansion of the structure of the Evros outpost is planned. The projects in these three areas, which constitute a single contract, have been blocked after the appeal of the Municipality of Chios to the Supreme Administrative Court (Council of State), regarding the area in which the structure is planned to be created on the island. However, the decision of the Council of State is expected to be published soon.

At the end of October 2021, a total of 4,532 asylum seekers remained on the islands, according to data from the Ministry of Immigration and Asylum, while previous year in October the numbers amounted to 18,872 people. Last year, a total of 3,625 asylum seekers arrived to the Greek islands by boat from Turkey. The construction of the new structures is expected to reach 300 million euros (budget 297.66 million with VAT) and the costs are covered by the European Union.

Sources from the Ministry of Immigration appear optimistic that the decision of the Council of State will be made public soon, which will constitute a rejection for the Municipality of Chios. Besides, the success of the operation of the structures in Samos, Kos and Leros - estimated by the same sources - will bend the reactions of the citizens of Chios.

In total, the contract for the construction of the new KYT in Chios, Lesbos and the expansion of the KYT in Evros reaches 176 million euros, of which 94 million are for the construction in Lesbos, 59 in Chios and 23 for the upgrade and expansion of outpost in Evros. According to the data of the Ministry of Immigration and Asylum, in the last year (October 2020 - October 2021) 6,176 new arrivals were recorded at the Evros outpost.

In short, the operational innovations of the organization of the structure of Samos, which allow the safe accommodation of the beneficiaries and the employed staff are:

- The organization of structure in neighbourhoods/distinct areas.
- Separate accommodation/neighbourhoods for vulnerable groups such as unaccompanied minors/single parent families, but also general accommodation, new arrivals and quarantine area.

In each neighbourhood there are:

- Restaurant areas with additional use as places for public activities and places for distribution of non-food goods
- Sports facilities
- Recreation areas – playgrounds
- Shared washing machines
- Shared kitchens

- Canteens
- Multiple areas of administration and housing services such as doctor's offices, school rooms and office of psychosocial and legal services.
- Green spaces cover 25% of the total space of the structure, while all interiors are air conditioned (accommodation and administration)
- Irrigation water recycling system resulting from tertiary wastewater treatment, either for use in toilets or for irrigation of the structure
- Adequate fire extinguishing system.

However, Amnesty International characterizes the detention of asylum seekers in the closed structure of Samos as illegal, stressing that the relevant decision of the Minister of Immigration and Asylum remains unpublished.

Also, regarding the structure of Samos, the characterization of prison is not excessive. It emerges from the very solemn announcements of the Minister of Immigration and the relevant press release that was made public.

Behind the careful photos with "playground" and "recreation areas", but also the expressions about "people who will regain their lost dignity", we read that in the new centre a "double NATO type security fence has been place, which in combination by installing at the entrance the necessary control systems, such as turnstiles, magnetic gates, x-rays, two-factor access control system (identity and fingerprint), ensures the safe and controlled entry to and exit from the structure to whoever is entitled to it". Finally, the installation of a CCTV system, which uses "smart" software, is foreseen throughout the structure.

Link:

<https://migration.gov.gr/nea-kleisti-elegchomeni-domi-samoy-enimerotiko/>

<https://www.amnesty.org/en/latest/news/2021/12/greece-asylum-seekers-being-illegally-detained-in-new-eu-funded-camp/>

5) Surveillance systems at refugee camps

In December 2021 the NGO Homo Digitalis expressed its concern for the introduction of surveillance systems (including thermal cameras, drones, monitoring of entry and exits through key-cards, use of AI behavioral analytics, facial recognition, etc.) at refugee camps throughout Greece (which are guarded by the police) and how it would affect the personal data rights of asylum seekers.⁴⁵ The NGO has also expressed that the facial recognition technology may lead to racial discrimination because they cannot effectively distinguish among ethnic groups with darker skin tones. Homo Digitalis and the European Digital Rights organization launched an investigation into the issue in the summer of 2021 and given that it could not access any information on the surveillance project, it contacted in October 2021 the Ministry of Migration Policy requesting access to information on mainly two surveillance systems, Yperion (Υπερίων) and Centaur (Κένταυρος).⁴⁶ According to Homo Digitalis, by the end of 2021 it had not received any response to its request, which was also forwarded to the Greek DPA.⁴⁷ On March 3, 2022 the Greek DPA launched an investigation into the two surveillance systems following a joint complaint of Homo Digitalis and the Hellenic League for Human Rights.⁴⁸

⁴⁵ Greece, Homo Digitalis, International Interest for the work of Homo Digitalis and the surveillance systems in the new closed refugee camps ([Διεθνές ενδιαφέρον για τις δράσεις της Homo Digitalis και τα συστήματα παρακολούθησης στις νέες κλειστές δομές προσφύγων](#)), last accessed on 27-04-2022; Aljazeera, [With drones and thermal cameras, Greek officials monitor refugees](#), last accessed on 27-04-2022.

⁴⁶ C. Petridi, Algorithm Watch Organisation, [Greek camps for asylum seekers to introduce partly automated surveillance systems, 27-04-2021](#), last accessed on 27-04-2022.

⁴⁷ Greece, Homo Digitalis, International Interest for the work of Homo Digitalis and the surveillance systems in the new closed refugee camps ([Διεθνές ενδιαφέρον για τις δράσεις της Homo Digitalis και τα συστήματα παρακολούθησης στις νέες κλειστές δομές προσφύγων](#)), last accessed on 27-04-2022.

⁴⁸ Greece, Homo Digitalis, Important success of civil society in Greece: the GDPA launches investigation of the Ministry of Immigration and Asylum for the systems YPERION and KENTAVROS, ([Σημαντική επιτυχία για την](#)

6) Greece launches temporary protection for Ukrainian refugees

Greece has begun offering Ukrainian refugees temporary protection at the country's regional asylum offices in Athens, Thessaloniki, Patras and Crete. The move is part of measures to assist over 16,000 Ukrainian refugees who have arrived in the country.

Greece on Monday officially began offering Ukrainian refugees temporary protection at the country's regional asylum offices in Athens, Thessaloniki, Patras and on the island of Crete. The move is part of Greece's measures to assist over 16,000 displaced Ukrainian refugees who have arrived in the country after joining millions of others in fleeing their country due to Russia's ongoing invasion.

Ministerial Decision 172172/28-3-2022 enacted the relevant provisions of P.D. 80/2006 on temporary protection which so far was not applied in Greece. However, the relevant Ministerial Decision is limited only to the case of applicants from Ukraine and under the following conditions:

- Ukrainian nationals who resided in Ukraine before 24 February 2022.
- Stateless persons and nationals of third countries other than Ukraine who benefited from international protection or equivalent national protection in Ukraine before 24 February 2022.
- Family members of the persons referred to in the first two categories, even if they are not Ukrainian nationals.

In Greece, the category of third country nationals or stateless persons residing in Ukraine before 24 February with permanent residence permits in Ukraine who cannot safely return to their country of origin is not eligible for temporary protection, but can apply for international protection.

Eligible persons applying for it will be granted Temporary Protection within 90 days from arrival, for an initial period of one (1)-year, i.e. until 4 March 2023. The status may be extended for another six months, i.e. until 4 September 2023 and then for another six months, i.e. until 4 March 2024. This status is provided by the Asylum Service of the Ministry of Migration and Asylum and gives the right of access to the labor market and to medical care.

Sources:

<https://www.mfa.gr/missionsabroad/en/slovenia-en/news/announcement-about-special-procedures-for-ukrainian-refugees.html>

<https://www.infomigrants.net/en/post/39682/greece-launches-temporary-protection-for-ukrainian-refugees>

<https://help.unhcr.org/greece/ukraine/>

3.2. Conclusion

The NIEM project is finally at an end and the importance of the project has been demonstrated by the important findings recorded in the national and comparative reports. In the case of Greece, the project and the research required for its fulfillment has been unprecedented. For many years, the integration of BIPs was far from the forefront of any governmental efforts. However, the status quo underwent a dramatic change in 2015 and the influx of migrants travelling to Europe through the Greek borders with Turkey.

[κοινωνία των πολιτών στην Ελλάδα: Η ΑΠΔΠΧ ξεκινάει έρευνα στο Υπουργείο Μετανάστευσης και Ασύλου για τα συστήματα ΥΠΕΡΙΩΝ και ΚΕΝΤΑΥΡΟΣ](#)), last accessed on 27-04-2022.

The unprecedented refugee crisis provided the opportunity for Greece to review its migration legislation as well as its policies for the integration of TCNs stranded in Greece, as the state of first-entry responsible for examining any applications for the awarding of international protection. During the past six years and for as long as the NIEM project has been running, the integration of BIPs has been gaining more and more attention. Today the landscape is much more robust with data in comparison to the barren landscape the research team had to navigate in order to be able to address the requirements of the NIEM project; a task that was made a lot easier thanks to the information shared through the national coalition meetings and the network of stakeholders that was created as a result.

The project helped in the identification of gaps in the national legislative framework, promising practices as well as gaps in the policy framework. The results of the project so far however have demonstrated that Greece is no closer to ensuring the full integration of BIPs than it was at the launching of the project. One indication of this trend is that only recently Greece has drafted and published a strategy aimed exclusively at the integration of BIPs and asylum-seekers. So far, this particular group has been included in policy measures aimed at TCNs in general, neglecting entirely the fact that BIPs face very different circumstances than TCNs when they first arrive in Greece.

There have been very few positive developments the past years, which have been seriously undermined by the frequent legislative amendments, which in turn have created legal uncertainty especially since some provisions appear to have a retroactive effect. The law also appears to treat beneficiaries of subsidiary protection way less favourably than refugees. In fact, the existing legal and policy framework strives to discourage asylum seekers from attempting to apply for international protection in Greece.

Furthermore, any efforts for the integration of BIPs in practice falls under the responsibility and efforts of NGOs, many times without the financial assistance of the State. Any governmental efforts for integration are transferred to local governments, especially the municipalities, yet the relevant funding depends mostly on EU funds. On the other hand, only the most vulnerable BIPs can benefit from integration measures implemented on a local basis.

Most of the gaps identified in the previous national reports for NIEM still remain unresolved. As noted in the first part of the present report Greece demonstrated the best progress in comparison to the Evaluation 1 phase. Yet this progress is insignificant when the overall scoring for the integration framework in Greece is way below the 50% mark. Greece has a very long way

to go and hopefully the results of the NIEM project will assist in any future endeavours for improvements that will allow BIPs to enjoy their rights in full.



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