

NATIONAL REPORT FOR THE EVALUATION MECHANISM FOR THE INTEGRATION OF REFUGEES AND ASYLUM SEEKERS

GREECE 2020



Contents

Prologue	2
1. Introduction: The National Framework in Numbers	4
2. The Basic integration pillars (integration indicators) of NIEM	9
3. Comparative framework: The results of the initial evaluation and the preliminary results of the current evaluation phase	12
3.1. The Initial Evaluation	12
3. 2. The Second Evaluation Phase (Evaluation 1).....	22
4. Most important developments from the first National Strategy for Integration	53
A) A new National Strategy for Integration	53
B) The asylum procedure and the implications of the EU-Turkey Agreement	60
C) The new guardianship system for unaccompanied minors.....	65
D) Housing.....	66
E) Family Reunification	71
Instead of an epilogue: What lies ahead?	76
1. About the comparative study.....	76
2. About Greece	77
SPECIAL ANNEX ON DEVELOPMENTS CONCERNING REFUGEES IN VIEW COVID -19.....	83
Bibliography.....	89

Prologue

The present report concerns the National Integration Evaluation Mechanism of beneficiaries of international protection. It is the second national report prepared within the context of the National Integration Evaluation Mechanism (NIEM) programme. This program is a six-year transnational project aiming to prepare key players from 14 EU Member States in the area of migrant integration, to better address the current challenges and improve the integration of beneficiaries of international protection. Beneficiaries of international protection are recognized refugees, beneficiaries of subsidiary protection, beneficiaries of temporary protection and beneficiaries of humanitarian protection.

NIEM has set up a two-year comprehensive mechanism to assess the inclusion of beneficiaries of international protection with the aim to underline possible gaps in the integration indicators as well as identify promising practices and assess the impact of legislative and policy changes.

NIEM is being carried out within the context of the changing legal framework for international protection at both national and European level; a change driven by the large numbers of new arrivals of people in recent years. The project seeks to provide evidence around some of the most critical questions concerning these changes. These are the following: Are EU standards for the integration of beneficiaries of international protection being properly implemented? How do they affect integration policies? Do policies aimed at beneficiaries of international protection have a positive impact on their integration? What are the challenges and good practices and what are the policy gaps that need to be addressed?

Since April 2017, "ANTIGONE - Information and Documentation Center for Racism, Ecology, Peace and Non-Violence", has been participating as a partner in the European programme of NIEM on behalf of Greece. The first phase of the program for the evaluation of the individual integration indicators covered the period from April 2015 to September 2017. The research presented in this report has been carried out for the

first evaluation of the indicators in comparison to their initial recording via the previous baseline assessment (Baseline Assessment). The present research presents the results of the period October 2017-April 2019 (with the exception of some updates that are explicitly mentioned). The integration indicators under consideration are mainly related to state initiatives. In the absence of such initiatives, the existence of initiatives undertaken by civil society was examined. Finally, it should be emphasized that this report is an update to the previous report. Therefore, it will not provide an exhaustive presentation of each of the sectors since this was already done in the previous report. Instead, it will rather update the pieces of data that have changed since the last baseline research.

1. Introduction: The National Framework in Numbers

This report, like the previous one, starts by presenting the official data concerning the registration of asylum seekers and the results on their applications. The competent authorities where the applications must be submitted are the Regional Asylum Offices¹. As it is widely known, the access to the international protection process is free of charge and open.

An applicant for international protection is a third country national or stateless person who declares orally or in writing to any Greek authority that he or she seeks asylum or requests not to be deported because he or she fears persecution because of race, religion, nationality, membership in a particular social group or political beliefs. The right of asylum might also be exercised because he or she is in danger of being seriously harmed in his or her country of origin or previous residence, in particular because he or she is in danger of a death penalty or execution, of torture or any inhuman or degrading treatment threatening the life or integrity of the asylum seeker due to an international or civil conflict.

The third country national, who is transferred to Greece from a state within the "Dublin III" Regulation, is also considered an applicant for international protection.

The countries covered by the Dublin Regulation III are: Austria, Belgium, Bulgaria, France, Germany, Denmark, Switzerland, Estonia, United Kingdom, Ireland, Iceland, Spain, Italy, Croatia, Cyprus, Latvia, Lithuania, Lithuania, Lithuania, Malta, Norway, Netherlands, Hungary, Poland, Portugal, Romania, Slovakia, Slovenia, Sweden, Czech Republic, and Finland. The Asylum Service is not competent to receive the application for international protection status if:

¹ The Asylum Service has a website in: <http://asylo.gov.gr>, last accessed 27-5-2020. The website offers information in 18 languages here: http://asylo.gov.gr/?page_id=159, last accessed 27-5-2020.

a) An application for international protection is considered pending after it has already been submitted to the Police;

b) The applicant is the holder of a special card awarded to third country national asylum applicants (pink card).

In 2018, 66,967 applications were submitted to the Asylum Service, 14.2% more than those submitted in 2017². It should be noted that by April 2019, 21,155 applications had already been submitted.

Greece has so far accepted a total of 28 incoming requests for relocation (from 2017 to April 2019), while a total of 15,248 requests have been submitted to the competent authorities. On the other hand, Greece has received more than 23,000 applications for relocation to other EU countries. Most applications seek relocation to Germany, Sweden and the United Kingdom (over 2,000 applications for each country)³.

As can be seen from the Asylum Service website, no data are available on the categories of beneficiaries of international protection who have received humanitarian aid or temporary protection. This is due to the fact that in Greece, after the issuance of Presidential Decree 167/2014, humanitarian status is neither under the old nor under the new procedure granted. Of course, according to article 22 of Law 4375/2016, those who had filed an appeal against the decisions on asylum applications up to five years before the entry into force of law 4375/2016 (April 3, 2016) and the examination of which were pending before of the Backlog committees, could receive a two-year residence permit for humanitarian reasons (according to the Immigration Code), which can be renewed. According to article 22 of the Law 4375/2016, a total of 4,935 decisions for the

² The statistical data is available here: http://asylo.gov.gr/wp-content/uploads/2019/05/Greek_Asylum_Stats_Apr2019_EN.pdf, last accessed 27-5-2020.

³ Regarding the relocation procedures of the Asylum Service see here: http://asylo.gov.gr/wp-content/uploads/2019/06/Dublin-stats_May19GR.pdf, last access 27-5-2020.

issuance of such residence permits for humanitarian reasons had been issued by the end of 2016.

On the other hand, regarding temporary protection, there are no data as the relevant provisions of P.D. 80/2006, concerning the granting of temporary protection were never activated.

In fact, the Hellenic Asylum Service only grants refugee and subsidiary protection status. Regarding the duration of the recognition, the Asylum Service grants residence permits for a period of three years to beneficiaries of international protection that can be renewed⁴.

The Hellenic Asylum Service does not provide statistics on the areas in which the beneficiaries live. It provides only the total number of applications submitted in cities and areas where their offices are set up.

According to the Asylum Service itself, the average duration of an asylum procedure is 107 days. This number refers to the average time for a decision in the first instance for the period 2013-2017 (May 30)⁵. However, this calculation does not take into account the duration of the pre-registration period. The average duration between pre-registration and final registration is 42 days⁶. According to the Greek Council of Refugees, the total duration in 2018 is set at an average of eight and a half months (216 days). The Asylum Service calculates only the average number of days starting from the moment of registration until the issuance of a final decision in the first

⁴ This information is available on the website of the Hellenic Asylum Service at the address: http://asylo.gov.gr/en/wp-content/uploads/2016/11/FINAL-QA_EN_06_2016.pdf, last accessed 27-5-2020.

⁵ See on the Press Release of the Asylum Service summing its 4 years of operation, 19-06-2017, available at: <http://asylo.gov.gr/wp-content/uploads/2017/06.pdf>.

⁶ The Greek Council for Refugees Submissions to the Asylum Information Database available in English at: <http://www.asylumineurope.org/reports/country/greece>, updated to March 2019, last accessed 27-5-2020.

instance. However, in the case of a negative decision, the average waiting period is 118 days (from the appeal against the first instance decision to the final decision).

Following the unprecedented increase in refugee flows mainly through the country's maritime borders since 2015, the closure of the "Balkan Route" in February 2016 (joint statement by police chiefs, Zagreb, Croatia⁷) and the EU-Turkey Statement of 18 March 2016⁸, at least 55,000 people remained trapped in Greece, resulting in enormous pressure on the Greek reception system; a reception system that for many years was characterized by significant deficiencies and problems⁹. Although important legislation has been introduced concerning reception and asylum, which has had a positive impact on the identification and protection of vulnerable groups (Law 4375/2016), and despite significant government efforts to address large-scale reception needs, there are still institutional deficiencies exacerbated in border areas due to aspects of the implementation of the EU-Turkey Statement. These deficiencies hinder the effective implementation of the relevant legal framework and hosting system. The above statement also introduced a "fast-track" procedure for summary proceedings, which was condemned by the European Fundamental Rights Agency for obvious violations of fundamental principles of European Law¹⁰.

Despite the improvements in the reception capacity throughout the years 2015-2016¹¹, the lack of effective and adequate reception facilities especially for those

⁷ The text of the Joint Statement is available at: https://www.mup.hr/UserDocImages/topvijesti/2016/veljaca/migranti_sastanak/joint_statement.pdf. Last accessed 27-5-2020.

⁸ Information on the EU-Turkey Agreement is available at: <http://www.consilium.europa.eu/press>. Last accessed 27-5-2020.

⁹ See the most important court decisions: MSS v. Belgium and Greece, no. 30696/09, ECtHR, 21-1-2011, available at: <http://www.refworld.org/cases/ECHR,4d39bc7f2.htm>. Last accessed 27-5-2020, and NS and ME and others, C -411/10 and C-493/10, WEU, 21-12-2011.

¹⁰ See related: FRA, Update of the 2016 Opinion of the European Union Agency for Fundamental Rights on the state of fundamental rights in the 'hotspots' set up in Greece and Italy, 3/2019, 4 March 2019, available on the website: <https://bit.ly/2WpjLCF>. Last accessed 27-5-2020.

¹¹ EC progress report 2nd Hotspot Report Greece, COM (2015) 678 Final, 15.12.2015, <http://www.statewatch.org/news/2015/dec/eu-com-Greece-hotspot-rep-com-678-15.pdf>. Last accessed 27-5-2020, EASO, Special Business Plan in Greece 2017, December 2016, at

belonging to vulnerable groups continues both in the front-line reception centers in the border areas / "hot spots" as well as in reception centers in the mainland. In addition to this,, the unclear legal status of most of the vulnerable groups, as well as the numerous authorities responsible for the operation of their reception mechanism and the lack of standard procedures for the operation of the centers, aggravate existing problems. Although vulnerable groups are excluded from the law concerning the border procedure, there are significant problems in identifying, referring and protecting them due to the lack of proper detection mechanisms and facilities. This situation is worsened by the overcrowding that Greek islands suffer after the EU-Turkey statement and the imposition of movement restrictions on asylum seekers arriving in Greece through the sea border¹².

In Greece there is no specific national strategy for the integration of beneficiaries of international protection for the period under consideration. There is only one national strategy for the integration of third-country nationals which was adopted in 2013 with EC and national co-financing¹³. It should be noted that a draft of the national strategy for the integration of third country nationals was published on the Greek public consultation platform in January 2019. The final text of the National Strategy was finally adopted in July 2019 and posted on the website of the (former) Ministry of Immigration Policy¹⁴. This strategy, which was to be co-financed through European

http://www.asylumineurope.org/sites/default/files/resources/easo_special_operating_plan_to_greece_2017_14122016.pdf: Last accessed 27-5-2020.

¹² See UN Human Rights Council, Report of the Special Rapporteur on the human rights of migrants on his mission to Greece, 24 April 2017, A / HRC / 35/25 / Add.2, para 9 and 53 ff., Available at: <http://www.refworld.org/docid/593a8b8e4.html>. Last accessed 27-5-2020.

Also, the text of the National Strategy for the integration of third country citizens is available here: http://www.ypes.gr/UserFiles/f0ff9297-f516-40ff-a70e-eca84e2ec9b9/ethnikisratig_30042013.pdf. Last accessed 27-5-2020.

¹³ The text of the National Strategy for the integration of third country citizens is available here. http://www.ypes.gr/UserFiles/f0ff9297-f516-40ff-a70e-eca84e2ec9b9/ethnikisratig_30042013.pdf. Last accessed 27-5-2020.

¹⁴The text of the new National Strategy is available here: <http://www.immigration.gov.gr/documents/20182/59315>. Last accessed 27-5-2020.

funds, also includes policies for beneficiaries of international protection. However, there is no provision for separate funding for programmes aimed at joining this group. Finally, it is worth mentioning that in 2018 there was an increase of 14.2% in asylum applications, while already by April 2019, 21,155 applications were submitted, almost a third of those submitted in 2018¹⁵. This means that the number of beneficiaries of international protection is expected to increase, as well as the need to define and coordinate policies for their integration into Greek society. In fact, asylum applications have increased by 66.2%¹⁶ according to statistical data of the Asylum Service for the period 2019- (February) 2020.

2. The Basic integration pillars (integration indicators) of NIEM

The NIEM research focused on the examination of indicators (legal, statistical and policy indicators) to evaluate the integration mechanisms in the participating

¹⁵The data is available here: [http://asylo.gov.gr/wp-content/uploads/2019/05/Greek Asylum Stats Apr2019 EN.pdf](http://asylo.gov.gr/wp-content/uploads/2019/05/Greek_Asylum_Stats_Apr2019_EN.pdf). Last accessed 27-5-2020.

¹⁶ See statistics of the Asylum Service here: [http://asylo.gov.gr/wp-content/uploads/2020/03/Greek Asylum Service data February 2020 gr.pdf](http://asylo.gov.gr/wp-content/uploads/2020/03/Greek_Asylum_Service_data_February_2020_gr.pdf). Last accessed 27-5-2020.

countries of the programme. These are essentially all the measures (legal and political) that have been adopted for the smooth integration of beneficiaries of international protection in Greek society. The areas that were investigated in order to assess the integration indicators are the following:

- I) Residence
- II) Naturalization/Citizenship
- III) Family reunification
- IV) Housing/Accommodation
- V) Employment
- VI) Vocational training and education
- VII) Health Care
- VIII) Social Insurance
- IX) Education
- X) Language learning and social education

These indicators follow the Common Basic Principles for Immigrant Integration Policy in the European Union, which are presented in the Annex to the Conclusions of the Justice and Home Affairs Council of the Council of the European Union (2618th Council Meeting, November 2004)¹⁷. The full set of 11 principles underlines that integration is a dynamic two-way process of mutual adaptation of all immigrants and citizens of the Union and implies respect for the EU's core values.

These principles are the following:

1. Integration is a dynamic, two-way process of mutual accommodation by all immigrants and residents of Member States.
2. Integration implies respect for the basic values of the European Union.
3. Employment is a key part of the integration process and is central to the

¹⁷ See Common Basic Principles for Immigrant Integration Policy (Council Document 14615/04).

participation of immigrants, to the contributions immigrants make to the host society, and to making such contributions visible.

4. Basic knowledge of the host society's language, history, and institutions is indispensable to integration; enabling immigrants to acquire this basic knowledge is essential to successful integration.

5. Efforts in education are critical to preparing immigrants, and particularly their descendants, to be more successful and more active participants in society.

6. Access for immigrants to institutions, as well as to public and private goods and services, on a basis equal to national citizens and in a non-discriminatory way is a critical foundation for better integration.

7. Frequent interaction between immigrants and Member State citizens is a fundamental mechanism for integration. Shared forums, inter-cultural dialogue, education about immigrants and immigrant cultures, and stimulating living conditions in urban environments enhance the interactions between immigrants and Member State citizens.

8. The practice of diverse cultures and religions is guaranteed under the Charter of Fundamental Rights and must be safeguarded, unless practices conflict with other inviolable European rights or with national law.

9. The participation of immigrants in the democratic process and in the formulation of integration policies and measures, especially at the local level, supports their integration.

10. Mainstreaming integration policies and measures in all relevant policy portfolios and levels of government and public services is an important consideration in public-policy formation and implementation.

11. Developing clear goals, indicators and evaluation mechanisms are necessary to

adjust policy, evaluate progress on integration and to make the exchange of information more effective.

In essence, this research is in line with the 11th EU Common Basic Principle for Immigrant Integration. For this reason, the main body of the present report assesses how these Common Basic Principles are being implemented in each of the aforementioned 10 areas in Greece by examining individual indicators.

3. Comparative framework: The results of the initial evaluation and the preliminary results of the current evaluation phase

3.1. The Initial Evaluation

In June 2019, the Brussels-based Migration Policy Group (MPG), responsible for the collection of data on indicators in each Member State participating in the NIEM program, published the report titled "The European benchmark for refugee integration: a comparative analysis of the National Integration Evaluation Mechanism in 14 countries".

This report presents a comparative and index-based assessment of refugee integration in 14 EU countries¹⁸. The analysis focuses on legal indicators, policy indicators but also indicators that assess integration (mainstreaming), policy coordination as well as measure the participation and assistance of the host society. The results are presented in relation to the basic steps that policy-makers must take to establish a refugee integration framework that are in line with the standards of

¹⁸ A. Wolffhardt, C. Conte and Th. Huddlestone, The European Benchmark for Refugee Integration: A Comparative Analysis of the National Integration Evaluation Mechanism in 14 EU countries, Migration Policy Group & Institute of Public Affairs, June 2019. The Report is available in English on the NIEM website here: <http://www.forintegration.eu/pl/pub>, last accessed 27-5-2020.

international and European law. These basic steps are "Defining the Legal Framework", "Building the Policy Framework "and" Integration and Cooperation ".

Important conclusions can be drawn from the transnational comparison of the dimensions of legal integration (residence, family reunification, access to citizenship), socio-economic integration (housing, employment, vocational education, health and social security) and socio-cultural integration (language learning / social orientation and building bridges with the host society).

The countries included in the survey to determine the basis of the assessment are Czech Republic, Greece, France, Hungary, Italy, Latvia, Lithuania, Netherlands, Poland, Portugal, Romania, Slovenia, Spain and Sweden. The results are rated from 0 to 100, ranging from the least favorable (0) to the most favorable provisions (100). The analyzed data refers to recognized refugees and beneficiaries of subsidiary protection as well as the legal and other provisions in force until April 2017 (survey conducted for the preparation of the first national reports). The main conclusions from the comparative analysis are the following:

The quality of integration policies for beneficiaries of international protection, despite the standards set by European and international law, varies widely from country to country. Europe is far from providing an even playing field and beneficiaries of international protection do not get the same fair and proportionate chances to integrate across Europe. Through incomplete and low-quality integration policies in the European area, Member States create - voluntarily or unintentionally - different opportunities for beneficiaries of international protection to achieve a better life in Europe. It is therefore crucial that any dialogue on the distribution of responsibilities in the field of asylum is guided by the obvious differences between Member States in implementing measures to support the integration of beneficiaries of international protection.

All the Member States examined can do better, even those that are generally scoring higher. The scoring results show that the countries are scoring average in most fields, indicating that conditions are average or less favourable. In essence, favourable

conditions are the exception to the rule. Of the aggregated scores obtained for each country per specific field, only 17% is equal to or above 80, indicating a favourable situation, while 21% is equal to or less than 20, proving that the situation is simply disadvantageous. From 0 to 100, the average values for the total of 14 countries in the above three steps are 66.8 (legal framework), 49.9 (policy framework) and 29.0 (integration and cooperation). All the countries examined need to significantly strengthen the frameworks they have established. However, there are no significant differences between the different categories of Member States. On the contrary, there are clear differences between states within these categories. Of the countries in north-western Europe, Sweden generally offers more favourable conditions than France and the Netherlands. From the southern European countries, Greece stands out as it offers the most disadvantageous context, a phenomenon observed in Hungary as a representative country of Central-Eastern Europe. The results do not indicate significant differences between countries with a long or short history of receiving refugees or in relation to the countries' regions and their position in terms of recent movements. Instead, targeted policy choices respectively determine the differentiation between countries that are in a comparable situation.

Generally, conditions regarding the access to services and benefits and the exercise of rights are favourable. Regarding the legal indicators in policy areas, the rating of the relevant countries was quite high with the exception of some areas. Countries provide mainly favourable conditions for beneficiaries of international protection in the areas of housing, health and education, as well as in language learning and social education. This helps in the exercise of their rights which speeds up the integration process.

This overall positive picture comes as a result of the fulfilment of obligations to comply with European and international rules which require countries to provide access on equal terms and ensuring equal treatment with their citizens. But even here, gaps, mainly related to restrictions arising from conditions that newcomers cannot meet, are identified. This is the case for example in the cases of access to housing, to vocational training as well as employment-related education. When it comes to access

to social security, seven of the countries examined impose conditions which are difficult for newcomers to meet or they even directly exclude beneficiaries from access to certain benefits. Access to upper secondary and / or higher education is restricted in four countries.

In contrast to legal indicators, the picture at the policy level is, on average, less favourable with the different aspects that refer to socio-economic and socio-cultural integration. Lower-scoring policy indicators reflect a widespread lack of positive support for action which suggests that in many countries there is a rather passive attitude towards refugee integration. Policies follow a narrow interpretation of the principle of equal treatment and do not take into account specific needs and the vulnerability of beneficiaries of international protection. This rather passive approach relates to the disappointing results in the field of raising awareness. Only Italy, the Netherlands and Sweden appear as countries where state authorities in more than one area (such as housing, education, health or social security) actively provide information on the specific needs and rights of beneficiaries of international protection. Responsible bodies in these cases are often called upon to raise awareness and inform their staff.

Stakeholder cooperation in the implementation of integration measures is the keystone for a more targeted policy action to clearly respond to the needs and perspectives of the target groups. Policies holding greater legitimacy resulting from wider involvement in which civil society and local / regional actors take a more interactive role, can also become more sustainable, hence having a stronger impact. Therefore, the indicators assess whether there are "partnerships" in which central governments actively support and integrate stakeholders so as to better assist beneficiaries of international protection in the fields of housing, employment, vocational training, health, social security and education.

The support of local and regional governance is rather infrequent in the countries evaluated. Education and social security are the dimensions in which central governments offer the most support as it is observed in the countries in which effective means of support are provided. In the dimensions of housing, employment,

vocational training and health, the number declines in three or four countries. Netherlands, Portugal and Sweden seem to have a systematic approach to these issues since, in each of these countries, government assistance is effective in relation to four or even five (in the case of Sweden) of the dimensions under examination. In the Czech Republic, Greece, Italy, Latvia and Lithuania, this only happens in one or two out of the five policy areas. When it comes to NGOs that receive active support from the central government for the help they provide to beneficiaries of international protection, the overall picture is somewhat brighter. In vocational training, social security and health-related tasks, nine or ten of the governments under review support civil society. In the areas of housing, employment and education, four to six countries actively support civil society in their efforts. In the Czech Republic, France, Italy, Romania and Slovenia, this is done in three or four of the six policy areas, while in Greece, Lithuania, the Netherlands, Portugal, Spain and Sweden, there is support of the civil society in at least one or two of the policy areas. However, often these funds are provided on a non-permanent basis, and NGOs do not have a stable, long-term framework to receive government support. In particular, in the areas of vocational training, health and social security (poverty alleviation), government instruments for civil society are mostly provided on an ad hoc basis only.

The countries under evaluation are generally not succeeding in building bridges between the beneficiaries of international protection and the host society that could help on both ends. Only in Portugal and Sweden the active participation of citizens is an integral part of the national strategy. Four more countries' strategies aim at the minimum of seeking tolerance and acceptance of their citizens. Six of the fourteen countries have witnessed, at least on an ad hoc basis, publicly funded campaigns aimed at raising public awareness of the refugee situation and their needs. In all countries, the encouragement and support of voluntary initiatives to complement public policies is almost non-existent on the part of central governments and, when provided, it occurs at a local level only or via ad hoc projects.

On the other hand, none of the countries evaluated seemed to consider volunteering as a significant instrument for achieving faster integration worthy of being supported by public resources and being part of the country's overall strategy for the integration

of beneficiaries of international protection. Furthermore, the participation of refugees in civic activities and the strengthening of their participation in society is not supported. Only the Netherlands and Sweden systematically encourage beneficiaries to participate in civic activities and / or volunteer work, while in the other six countries, support for such initiatives depends on civil society or local government. Consultation with the beneficiaries themselves on integration issues and on the policies aimed at their integration is almost unknown while the integration of refugees becomes, at best, an additional issue for the general immigration integration advisory bodies. From the results from the NIEM indicators in fourteen countries that are consistently representative of the whole EU, the conclusion is that strengthening participation and mutual coexistence with the host society represents the weakest point of refugee integration policies in Europe.

Considering all the elements that play a decisive role in the long-term integration, countries progress varies depending on their legal and political frameworks. When examining both the legal and political indicators as a whole in relation to socio-economic and socio-cultural integration in these countries, the most favourable fields are, in average, the ones of health and education followed by social security. On the other hand, employment, housing and vocational training stand out as the areas with the least favourable conditions overall. More concretely, their weaknesses include access to targeted short-term housing support and lack of long-term housing support measures. When it comes to employment, the reasons for the low scores are explained by the general lack of concrete active labour market support measures combined with the administrative barriers to access work.

Language learning and social orientation are not universally offered, and there are significant quality differences between the countries. Support for learning the language of the new country and understanding how things work is critical for a fast and successful integration. However, countries have very different standards. Half of the countries offer free language courses without further restrictions, while in others the language courses are compulsory and / or free and / or attendance is required to access to other rights. Greece and Hungary in fact do not offer language learning at all, which is the most fundamental part of a publicly funded integration policy. The

findings of social orientation follow closely the findings of language learning; low quality of measures and widespread poor results are recorded in this category.

Some countries show consistent results across all dimensions, while in others, the results vary considerably depending on each dimension. In the first case, this could be due to a lack of a generalized approach to refugee integration. If the focus is brought to the "Building a Policy Framework" step, the countries in which the socio-economic and socio-cultural integration results are stable are the Czech Republic, Lithuania, Romania and Sweden. On the other hand, the countries with greater diversity between the various policy areas such as housing, employment, education or health are Greece, Hungary, Portugal, Slovenia and Spain. In general, countries need to fill, on the basis of a high standard, gaps in all relevant policy areas.

Countries are better at adopting a legal framework than taking measures for policy development and integration: This indicates a passive attitude towards the integration of refugees. For the most part, the countries offer favourable conditions on access to rights, especially with regard to housing, health, education as well as language learning and social orientation. In contrast to legal indicators, the findings related to policy indicators are, on average, less favourable on the socio-economic and socio-cultural integration dimensions. By acknowledging the factual and general lack of active support, this material suggests the existence of a passive attitude towards refugee integration defined by policies following a narrow interpretation of the principle of equal treatment, hence failing to consider the needs and vulnerabilities of beneficiaries of international protection.

Concerning legal integration in relation to residency, family reunification and citizenship the provisions are on average less favourable. The majority of analysed countries have restrictive laws on residency permits and on the acquisition of citizenship through naturalization. To a large extent, beneficiaries of subsidiary protection are subject to more restrictive arrangements than recognized refugees, thus intensifying the differences in the results of this dimension. Thus, the scores of countries differ widely with grades ranging from 10 (Hungary) up to 90 (Lithuania) when it comes to recognized refugees and from 10 (Hungary) to 70 (Spain) when the

indicators are related to the beneficiaries of subsidiary protection. The indicators become more aligned in respect to family reunification where a generally more favourable context prevails with the exceptions of Greece, Hungary and Poland. Citizenship emerges as the worst scoring field with a general differentiation in the treatment between beneficiaries of subsidiary protection and refugees, a fact that leads to an even greater restriction of the already narrow frameworks.

Additional barriers are created by disproportionately high fees for acquiring permanent / long-term residency, family reunification and acquiring citizenship. Significant differences between the countries are observed with regard to the fees for the acquisition of permanent / long term residence, family reunification and citizenship acquisition. While the fees for the permanent / long-term procedure generally do not exceed 50% of the minimum monthly social assistance allowance in each country, fees for family reunification procedures range from zero in four countries to well over the total of the monthly allowance in Hungary, Latvia and Romania. Citizenship fees also vary widely, with five countries having fees claiming more than 50% of their monthly allowances.

While there is no different treatment of recognized refugees and beneficiaries of subsidiary protection in the exercise of their rights and support measures, the difficulties posed by the legal frameworks in regards to residency, family reunification and naturalization aggravate their conditions for integration, thus affecting the exercise of their rights. With few exceptions, recognized refugees and beneficiaries of subsidiary protection are accorded the same treatment when considering the equal exercise of rights and targeted integration measures. However, when considering the dimensions relating to the legal integration of subsidiary protection status and their family members (e.g. residency, family reunification, naturalization), all countries, with the exception of the Netherlands and Spain, seem to apply a different framework which provides less favourable conditions for beneficiaries of subsidiary protection than for refugees, thus creating additional barriers due to the instability of their transitional situation.

Administrative barriers are widespread, and countries are missing out on important easy-to-solve opportunities to facilitate integration. These include hard-to-find documents, delays and waiting periods, as well as the discretion of the institutions in making decisions. According to the NIEM Comparative Report, the obstacles are greater in matters related to housing while in relation to employment, vocational training, health and education the processes seem to work more efficiently as the indicators of half of the countries show.

The area of language learning and social orientation is as problematic as the dimension of housing given that only nine countries seem to offer such courses without imposing administrative barriers to access them. Sweden and the Netherlands are the countries least affected by the problem of administrative barriers. On the other hand, France, Greece, Latvia, Romania and Slovenia are the countries where beneficiaries of international protection face more frequent and persistent administrative obstacles.

In general, the "Integration and Collaboration" step presents the poorest results of all the steps. In particular, countries are weaker in mainstreaming refugee integration and have significant shortcomings in the effective implementation of national strategies. Countries only manage to achieve average or low scores in the refugee integration, thus policies covering this area should generally be considered ineffective. Most of them do not effectively coordinate with governmental policies and fail to efficiently address the social challenges related to the integration of refugees.

The results for the area of integration show that while the majority of countries have in some way a national approach to the integration of beneficiaries of international protection, only the Czech Republic, Italy and Sweden combine a specific strategy involving various ministries and are supported by an exclusive budget. Within the six dimensions related to socio-economic and socio-cultural integration, the indicators assess sectorial mainstreaming. Coordinated and multi-stakeholder strategies seem to be very few in housing, employment, health, social security and education. In each of these areas, only three or four countries seem to fully aim at a strategy that binds together relevant ministries, institutions, local or regional authorities and NGOs.

The possibility of cooperation of civil society and local / regional government authorities and the implementation of a common policy appears as a missed opportunity in the majority of states examined. In all six areas, the indicators assess the extent to which central governments are actively supporting key actors and providing them with the appropriate tools to support beneficiaries of international protection. With regard to the support for local and regional government authorities, education and social security are the dimensions in which central governments offer the greatest support. More specifically, six of the countries examined offer clearly defined instruments. In the areas of housing, vocational training and health, the numbers go down in three or four countries for each sector. With regard to positive measures taken by the central government to support civil society to help beneficiaries of international protection, the picture becomes more optimistic as the results show that governments or sponsors or partnerships in practice provide support to civil society actors.

In the areas of vocational training, social security and health, nine or ten of the countries measured the support of civil society. In the fields of housing, employment and education, four to six countries actively support civil society with their initiatives in these areas. However, these means are provided in a segregated way, so they have difficulties to offer a permanent or long-term governmental framework to support NGOs.

The results of the countries' integration policies are in most cases poor with regard to the encouragement of the participation of the social network of international protection, the involvement of the host society in the integration process, in essence not complying with the two-way nature of integration addressing both immigrants and the host society. The examined countries largely failed to build bridges that would help the beneficiaries establish durable ties with the host society. Only Portugal and Sweden have developed national strategies, which explicitly adopt the active participation of citizens. In six of the fourteen countries, publicly funded actions were taken to raise public awareness of the situation and needs of refugees. Of all the countries examined, complementary measures-policies of the central government to encourage and support voluntary initiatives appear to be largely absent. In conclusion,

the NIEM indicators-based scores of the fourteen EU countries show that the promotion of the participatory and two-way integration process by providing facilitations for both beneficiaries of international protection and the host society, represents the weakest point of refugee integration policies in Europe.

3. 2. The Second Evaluation Phase (Evaluation 1)

The results of the first evaluation phase (Evaluation 1), which refers to the evaluation of the indicators based on the research of the second phase (first evaluation was intended to set the baseline for future evaluation) are based on any developments that took place from 2017 to April 2019.

The corresponding report has not been published yet, but the results and the key findings are available through the Summary of the report of 2020¹⁹.

The Summary of the Report presents the basic data and developments from the scoring and evaluation of the fourteen participating countries of the period 2017-2019. The forthcoming European Comparative Report will include a detailed presentation of the developments and it will put forward a list of best practices for the integration of beneficiaries of international protection. The countries examined for the second evaluation of the NIEM (Evaluation 1) programme are Bulgaria, the Czech Republic, France, Greece, Hungary, Italy, Latvia, Lithuania, the Netherlands, Poland, Romania, Slovenia, Spain and Sweden. With the exception of Bulgaria, which is for the first time participating in the evaluation, and Portugal, which has withdrawn from the program, the rest of the countries continue to be examined in the second evaluation, hence making possible the comparison with the results of the previous NIEM Report in order to identify and acknowledge any changes.

The Summary of the 2020 Report highlights the following conclusions:

¹⁹ See on A. Wolffhardt and C. Conte. *The European Benchmark for Refugee Integration: A Comparative Analysis of the National Integration Evaluation Mechanism in 14 EU countries*, Evaluation 1: Summary Report 2020, Migration Policy Group & Institute of Public Affairs, 2020, available here : <http://www.forintegration.eu/pl/pub>, last accessed 27-5-2020

A) Lack of means and prevalence of large gaps

Minimal changes were recorded in the integration of refugees from the countries under evaluation during the period 2017-2019. In general, refugees rarely face fully favourable conditions for integration in any area of their lives. Larger gaps still exist when it comes to integration policies supporting the integration of beneficiaries of international protection, the dimension of integration of refugees by long term perspective and multi-level cooperation with various institutions. Most governments are not involved in the establishment of partnerships between civil society and local / regional authorities in order to develop and integrate a policy framework. The subsidizing and financial support of these bodies appears as a big problem. While countries receive on average better scores for ensuring rights and an adequate legal framework to protect them, a narrow interpretation of the principle of equal treatment often prevails with regard to the special needs and vulnerabilities of the beneficiaries concerned.

B) Improving cooperation is a goal of only a few countries

With widespread and very introspective frameworks which are prone to very slow change, the only notable positive development which occurred thus far is the cooperation and political integration. On average, between the 13 evaluated countries, indicators of NIEM relating cross - Governmental and Sectorial mainstreaming, the multi-level integration and also NGO and host society engagement, showed an increase of about six points despite starting from a fairly low level. A closer look to this development shows proactive efforts to systematically improve refugee integration in France and Lithuania and, to a lesser extent, in Latvia and Slovenia. In the other countries changes have taken place in a more limited manner.

C) The gaps between the recognized refugees and the beneficiaries of subsidiary protection

The gap between the rights of recognized refugees on the one hand and beneficiaries of subsidiary protection on the other, with respect to the areas of residency, family

reunification and citizenship, still remains. There was relatively little improvement in the case of France and Poland, while in Italy, with a different treatment of long-term residents, opportunities for these two groups, widened even more the gap. Governments and European policymakers must now consider how this inequality in family reunification, permanent residency and access to acquiring citizenship can adversely affect their efforts to integrate the more than one million people who have received international protection in the EU since 2016.

D) Few countries act, few countries take a step back, most countries are inactive:

The countries that showed the most positive changes across all fields are France, with an improved score in ten out of the twelve fields, and Lithuania, which made progress in eight. Latvia and Slovenia have made positive progress in six and five areas respectively. The countries that did not see any improvement in any area were Italy, the Netherlands and Sweden. Romania, on the other hand, presented a negative dynamic, scoring worse in five areas, while Hungary and Italy fell behind in three areas each. No negative development scores were recorded in the case of the Netherlands, Spain and Sweden. In general, the Netherlands and Sweden appeared to have the most stable frameworks between the years 2017-2019 sustaining a positive development.

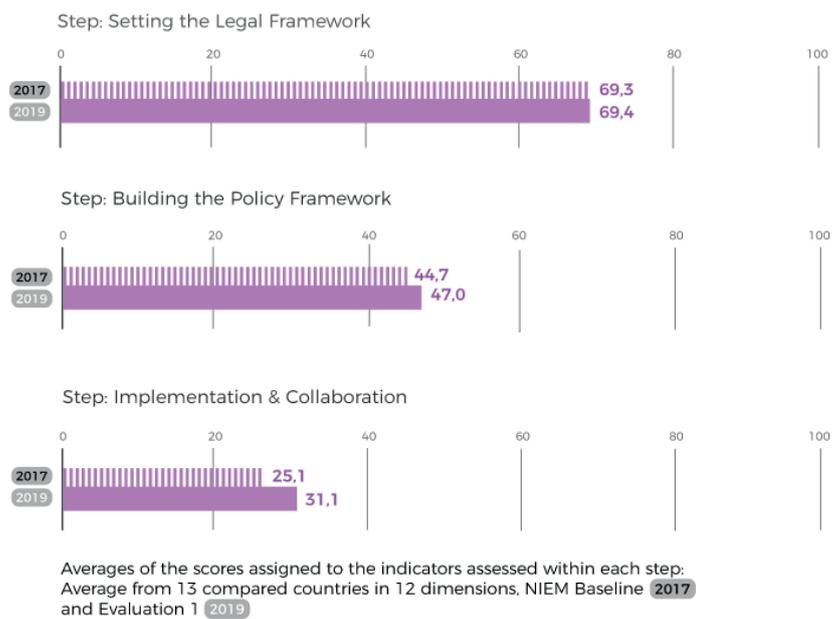
E) Existence of diverse integration standards across different fields: improvements in some and setbacks in others

The fields with the most positive results during 2017-2019 are that of social security - where eight out of the thirteen countries showed improvement- and those of employment, health and education, which follow with five countries, each of them separately, showing improvement. The fields that had the most negative scores are housing and health, where three countries received a score lower than that of two years ago. The fields related to socio-economic and socio-cultural integration, health and education, continue to be the areas with the most favourable legal and policy frameworks, with social security following too. Contrary, less favourable integration conditions are still observed in the areas of housing, employment and vocational training.

The tables with data of the second evaluation phase by field are presented in the following pages:

Table A. General trend of changes for the period 2017-2019 for all sectors with regard to the configuration of legal framework, in the policy framework and to integrate policies and cooperation (from top to bottom)

Overall change 2017 to 2019



1) Building Bridges

Table 1. Change registered from 2017 to 2019 with respect to the configuration of policy frame (up) and integration and cooperation (bottom)

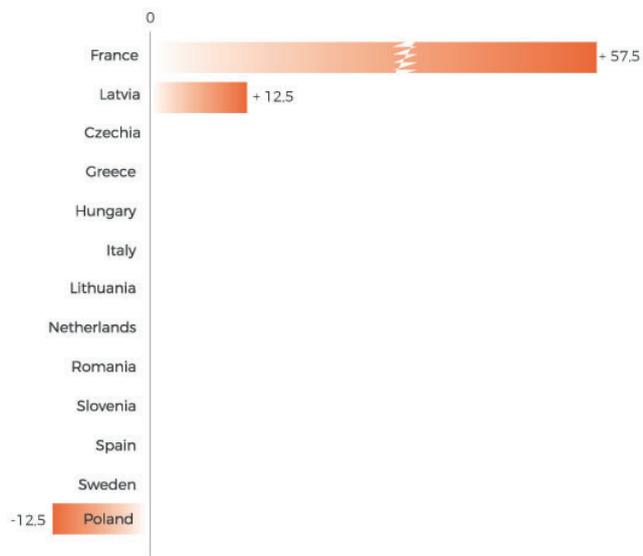
Overall change 2017 to 2019



Averages of the scores assigned to the indicators assessed within each step. Average from 13 compared countries in NIEM Baseline 2017 and Evaluation 1 2019

Table 2. General trend of changes for 2017-2019 on integration by country with the positive changes appearing on the right and the negative ones on the left.

Overall change 2017 to 2019 by countries



Average of the scores assigned to each step (as the average of the indicators assessed within each step)

Table 3. The situation of policy integration and cooperation by country. Countries with the least favourable trends on the left and the most favourable trends on the right.

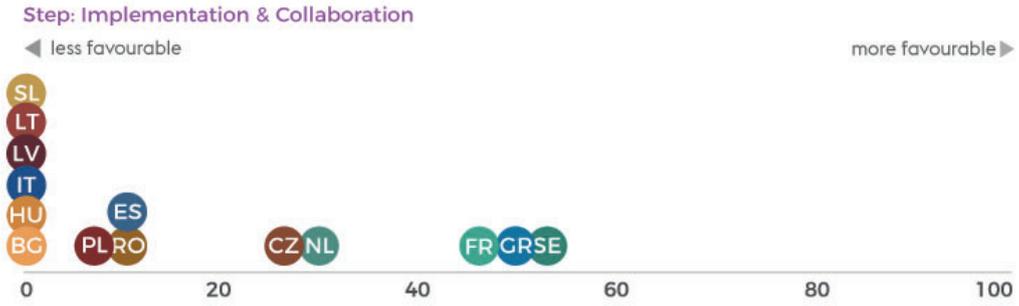
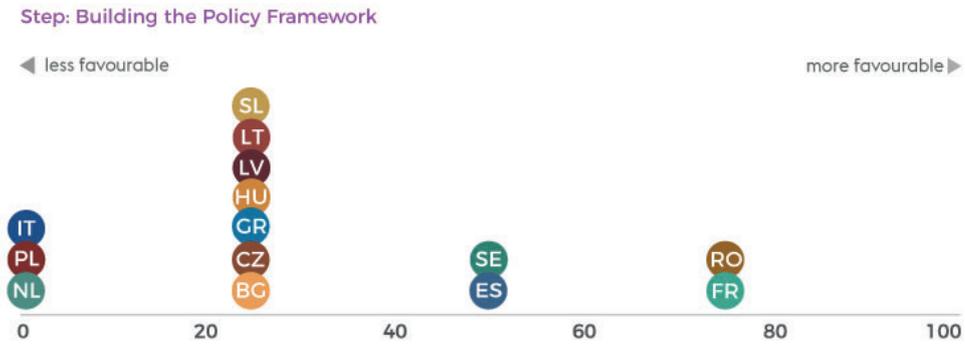


Table 4. Evolution of the policy framework by country on integration. Countries with the least favourable trends on the left and the most favourable trends on the right



2) Citizenship

Table 1. Evolution of the legal framework on citizenship by country. Countries with the least favourable trends being on the left and the most favourable trends appearing on the right. The figures for refugees are given above and below are the figures for beneficiaries of subsidiary protection.

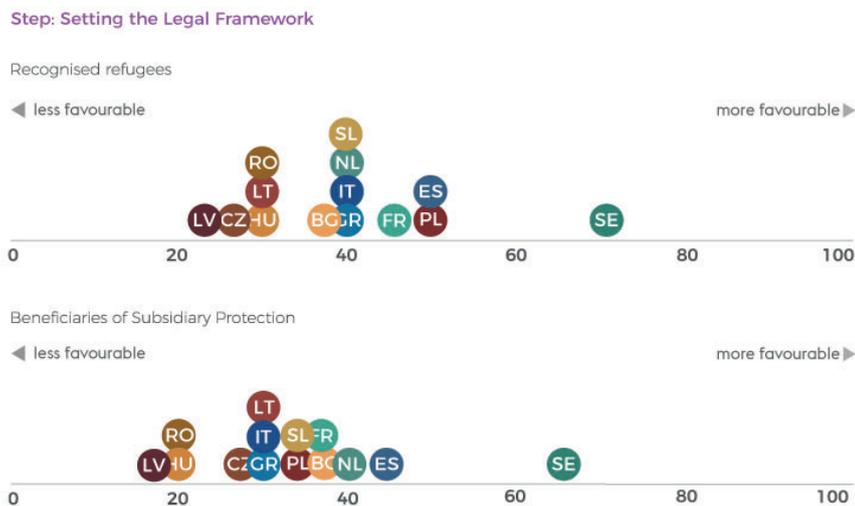


Table 2. Overview of the changes for 2017-2019 regarding the legal framework on citizenship (top) and policy integration and cooperation (bottom). The data for refugees is displayed in dark purple, while the data for beneficiaries of subsidiary protection is displayed in light purple.

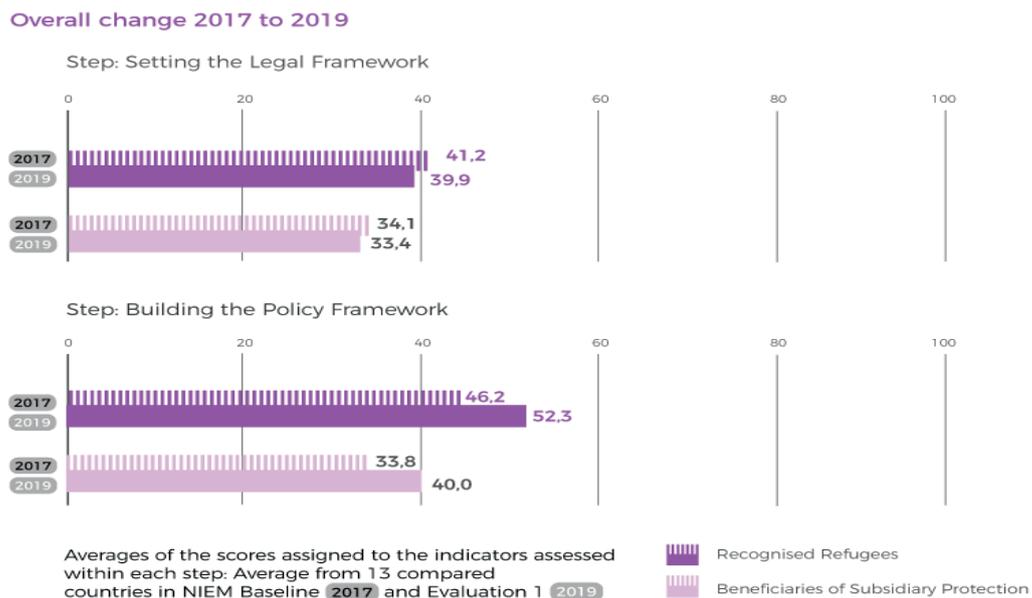
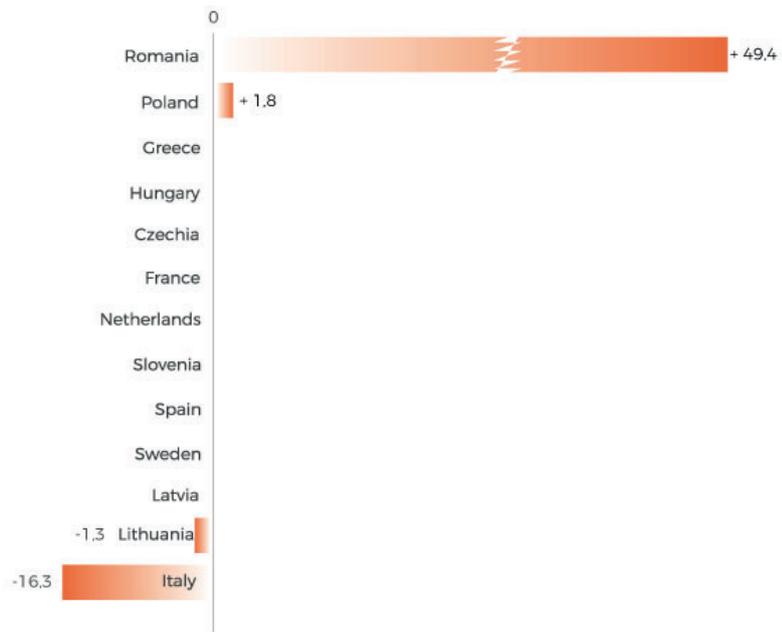


Table 3. General trend of changes in the countries under evaluation. Positive trends measured in the right and the negative trends in the left.

Overall change 2017 to 2019 by countries



Average of the scores assigned to each step
(as the average of the indicators assessed within each step)

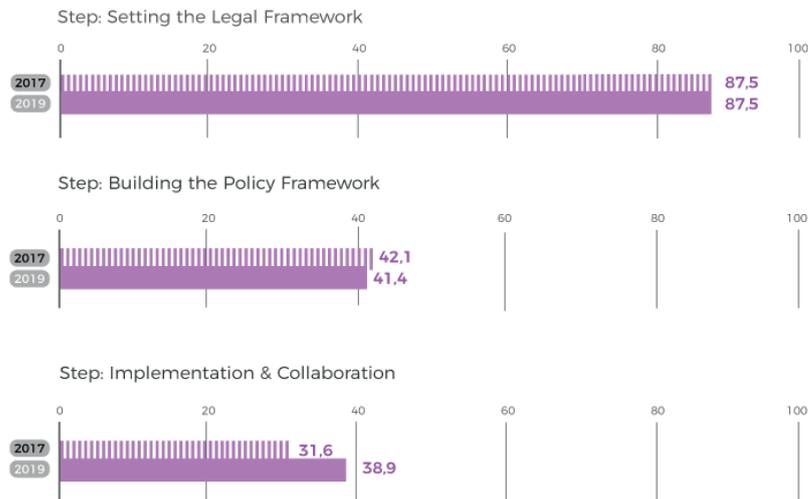
Table 4. Record data on the policy framework on citizenship by country. Favourable trends are represented on the right and the least favourable trends are represented on the left. Data on refugees is represented on the top and data on beneficiaries at the bottom.



3) Education

Table 1. General trend of changes for 2017-2019 (top to bottom) regarding the legal framework on education, the policy framework and policy integration and cooperation.

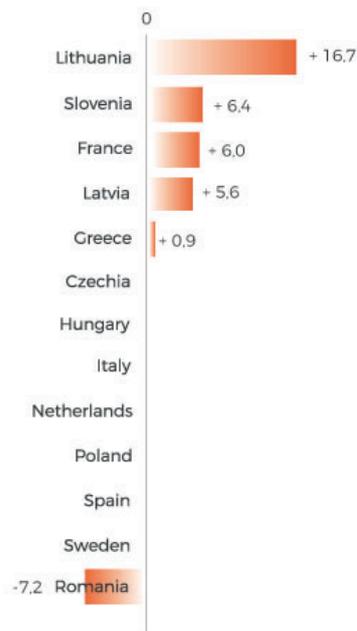
Overall change 2017 to 2019



Averages of the scores assigned to the indicators assessed within each step: Average from 13 compared countries in NIEM Baseline (2017) and Evaluation 1 (2019)

Table 2. General trend of changes on education by country for 2017-2019 with the positive trends being shown to the right and the negative ones to the left.

Overall change 2017 to 2019 by countries



Average of the scores assigned to each step (as the average of the indicators assessed within each step)

Table 3. Recorded data on policy integration and cooperation regarding education by country with the most favourable trends being presented to the right and the least favourable to the left.

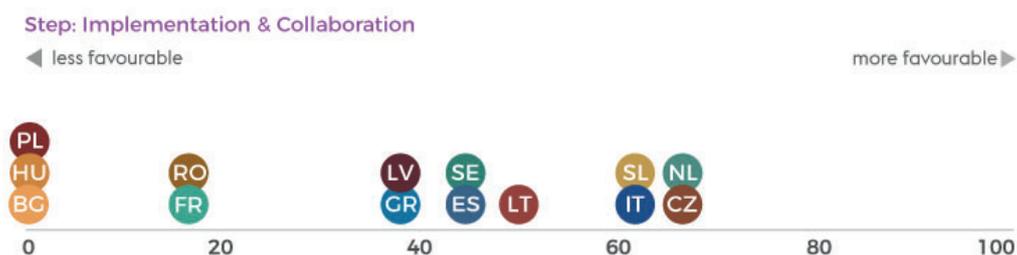
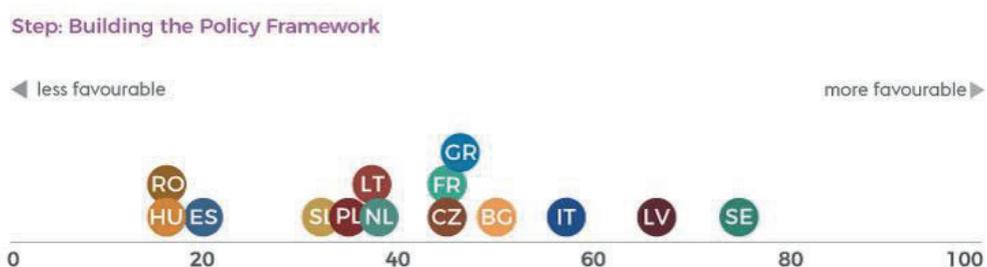


Table 4. Recorded data on the policy framework on education by country with the most favourable trends being presented to the right and the least favourable to the left.



4) Employment

Table 1. Presentation of a general trend of changes on employment for 2017-2019 (from top to bottom) regarding the shaping of the legal framework, the shaping of the policy framework and the integration of policies and cooperation.

Overall change 2017 to 2019

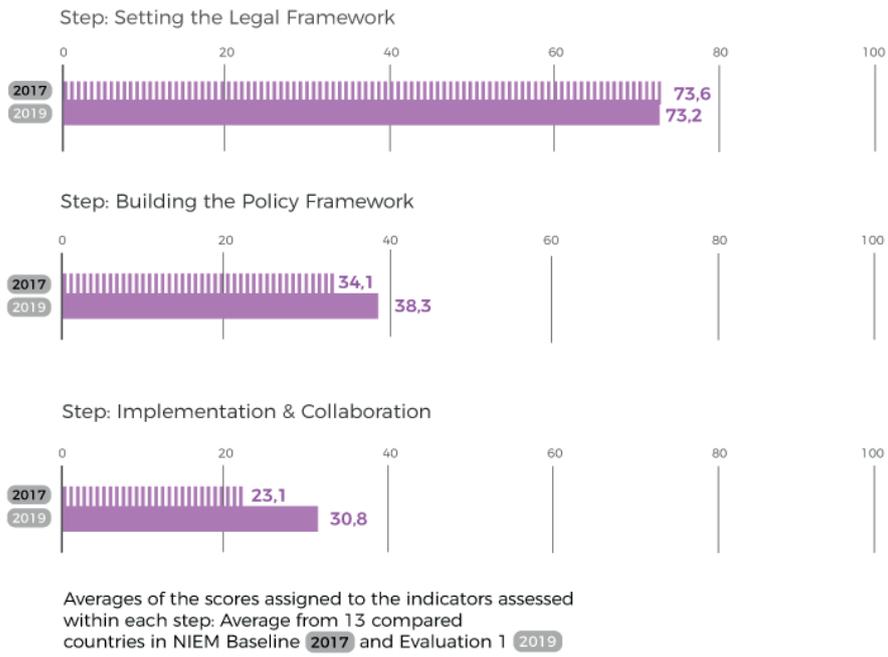
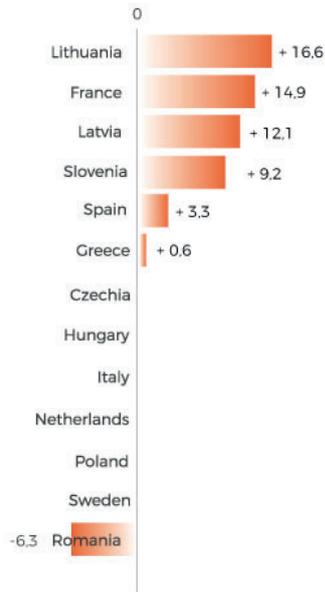


Table 2. General changing trends on employment by country for 2017-2019 with the positive ones appearing to the right and the negative ones to the left.

Overall change 2017 to 2019 by countries



Average of the scores assigned to each step
(as the average of the indicators assessed within each step)

Table 3. Record data on work policy integration and cooperation by country with the most favourable trends being presented to the right and the least favourable to the left.

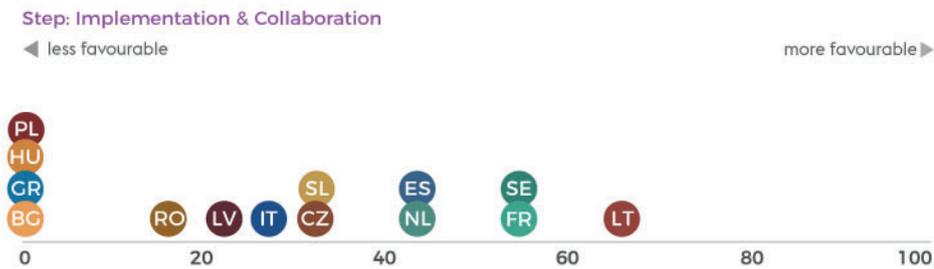


Table 4. Recorded data on the employment legal framework by country with the most favourable trends being presented to the right and the least favourable to the left.

Step: Setting the Legal Framework

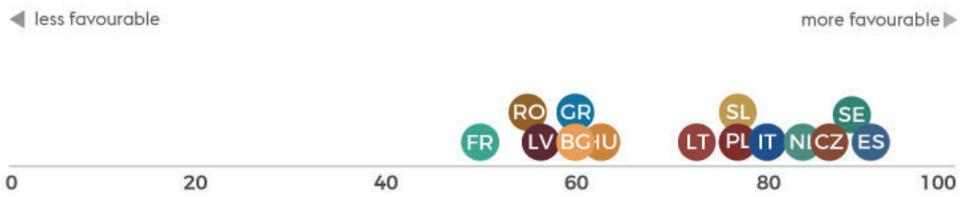
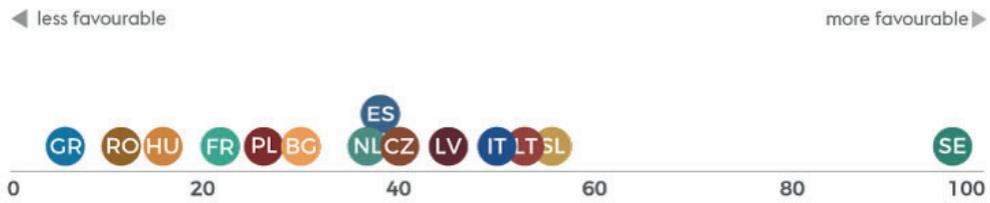


Table 5. Recorded data on the employment policy framework by country with the most favourable trends being presented to the right and the least favourable to the left.

Step: Building the Policy Framework



5) Family Reunification

Table 1. Recorded data on the legal framework on family reunification by country with the most favourable trends being presented to the right and the least favourable to the left. On top, the information relating to refugees while underneath that related to beneficiaries of international protection.

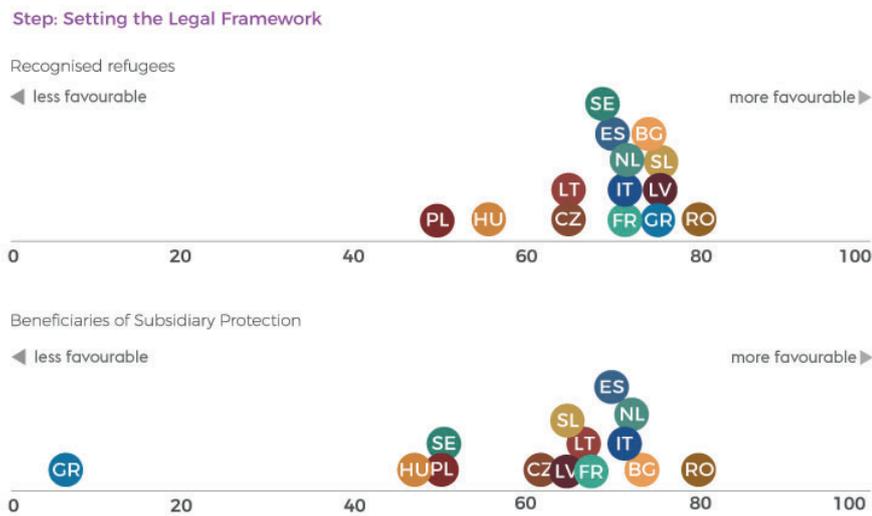


Table 2. Recorded data on the policy framework on family reunification by country with the most favourable trends being presented to the right and the least favourable to the left. The figures above relate to refugees while below to beneficiaries of subsidiary protection.

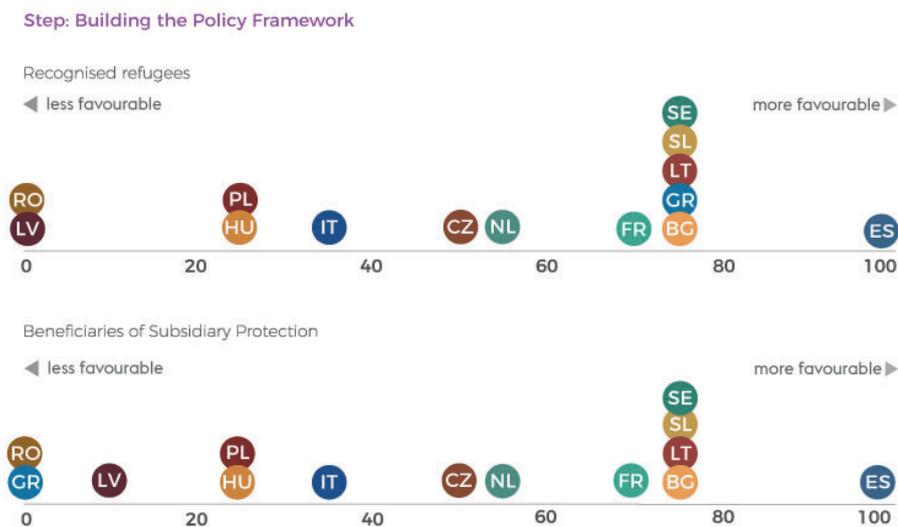


Table 3. General trend of changes for 2017-2019 (from top to bottom) regarding the shaping of family reunification's legal framework and the shaping of the policy framework. Dark purple data is related to refugees and light purple to subsidiary protection.

Overall change 2017 to 2019

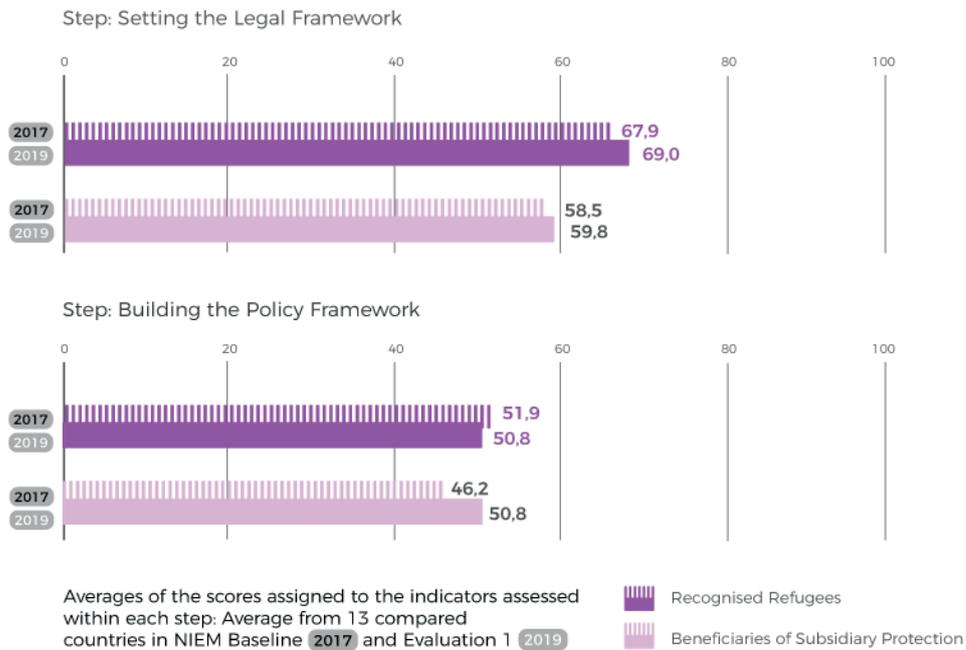
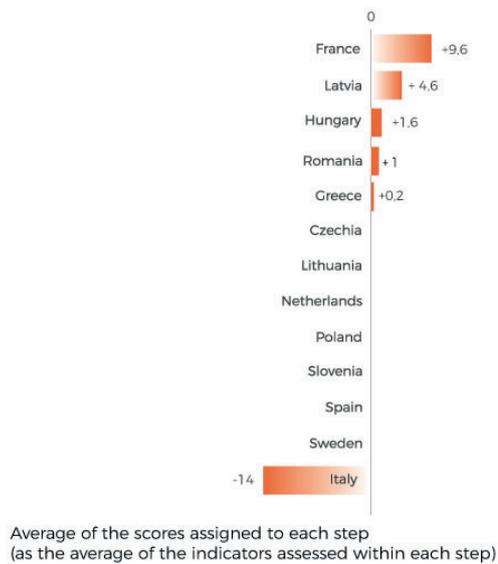


Table 4. Recording of change trends on family reunification by country with the positive ones appearing to the right and the negative ones to the left.

Overall change 2017 to 2019 by countries



6) Health Care

Table 1. Recording of the general trend of change in health care for 2017-2019 (top to bottom) on legal framework, policy framework and policy integration and cooperation.

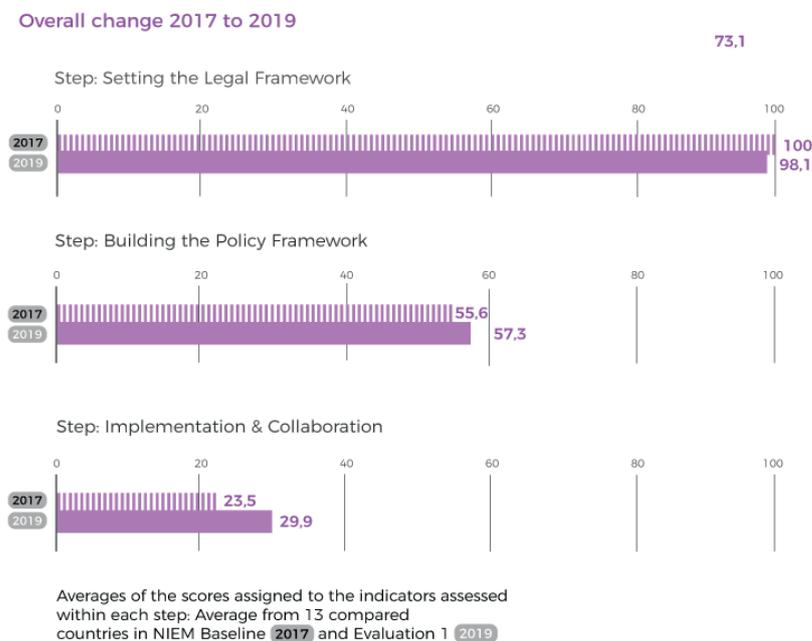
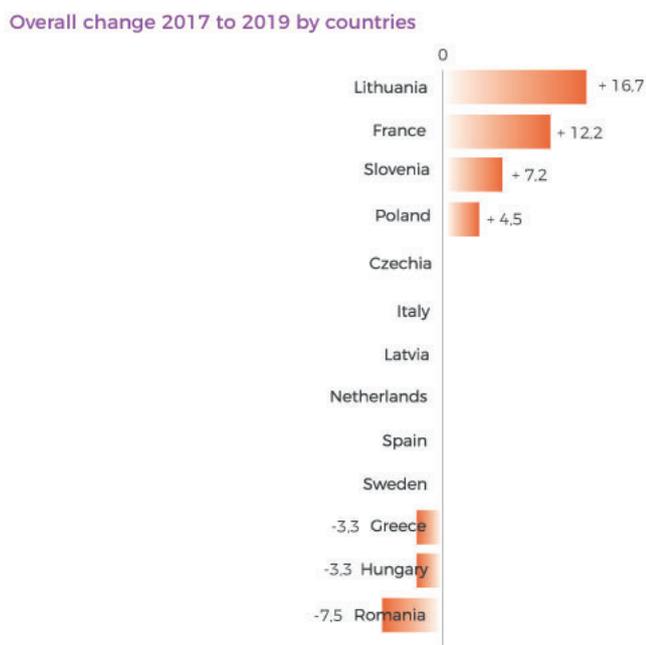


Table 2. Recording of general trend of changes in health care by country with the positive developments appearing to the right and the negative to the left.



Average of the scores assigned to each step (as the average of the indicators assessed within each step)

Table 3. Recorded data on health care policy integration and cooperation by country with the most favourable trends being presented to the right and the least favourable to the left.



Table 4. Recorded data on the legal framework on health care by country with the most favourable trends being presented to the right and the least favourable to the left.

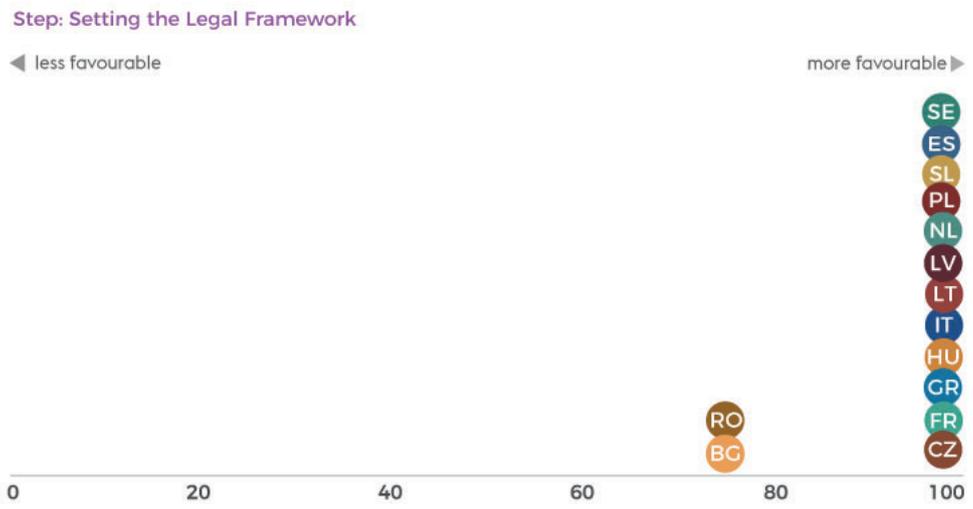


Table 5. Recorded data on the policy framework by country with the most favourable trends being presented to the right and the least favourable to the left



7) Housing

Table 1. General trend of changes for 2017-2019 (from top to bottom) regarding housing's legal framework, the policy framework and the integration and cooperation.

Overall change 2017 to 2019

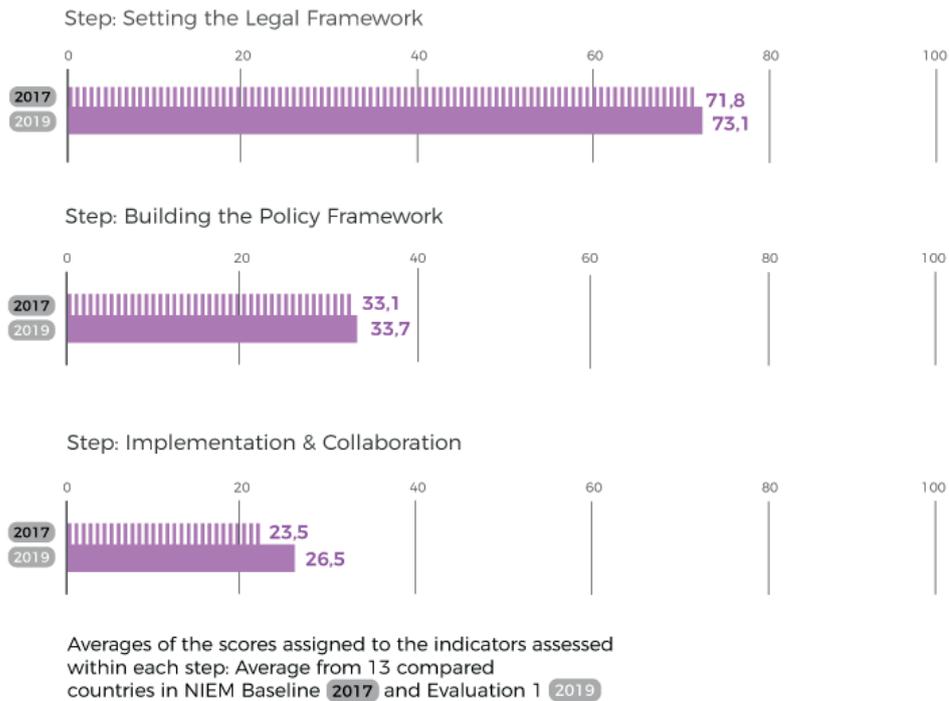
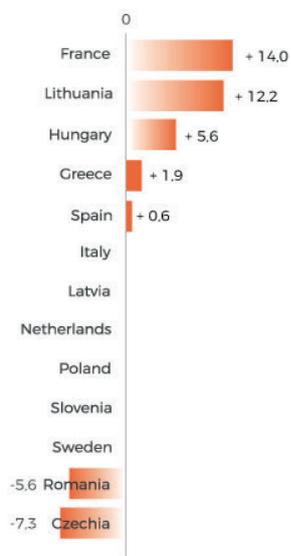


Table 2. Recording of the changes in housing by country with the positive trends displayed to the right and the negative to the left.

Overall change 2017 to 2019 by countries



Average of the scores assigned to each step (as the average of the indicators assessed within each step)

Table 3. Recorded data on housing policy integration and cooperation by country with the most favourable trends being presented to the right and the least favourable to the left

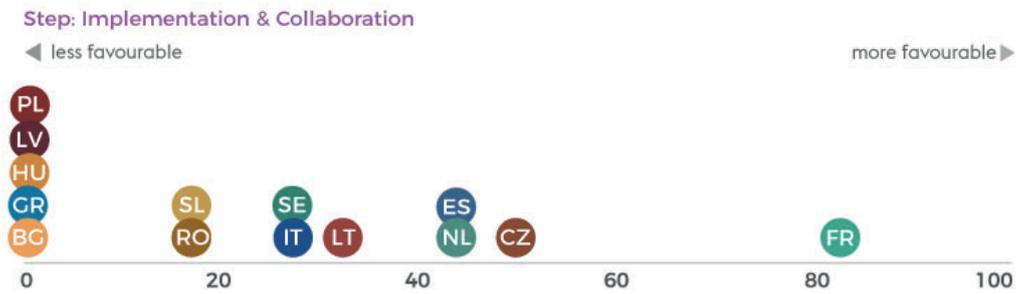


Table 4. Recorded data on housing legal framework by country with the most favourable trends being presented to the right and the least favourable to the left

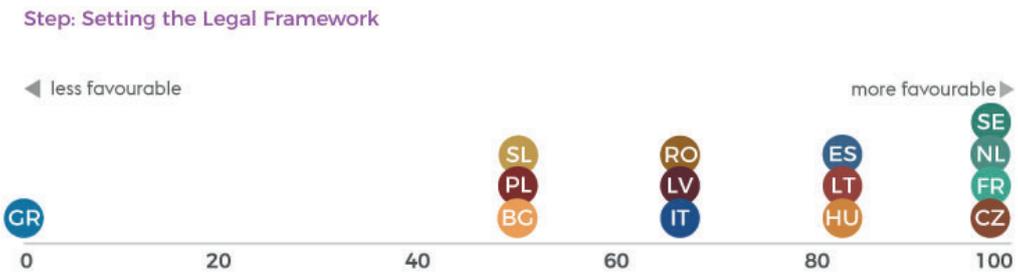
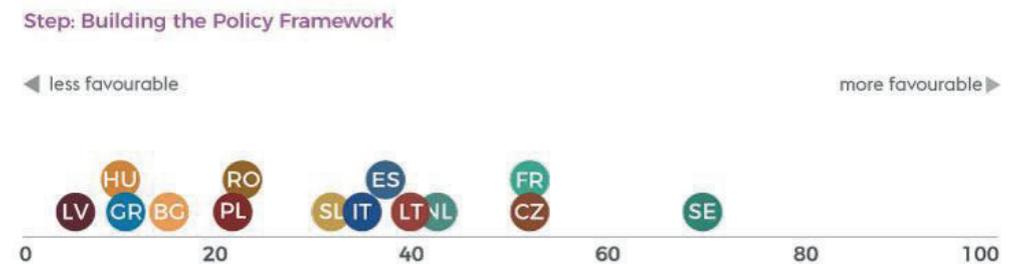


Table 5. Recorded data on housing policy framework by country with the most favourable trends being presented to the right and the least favourable to the left



8) Language Learning and Social Orientation

Table 1. Recorded data on language learning and social orientation legal framework by country with the most favourable trends being presented to the right and the least favourable to the left.

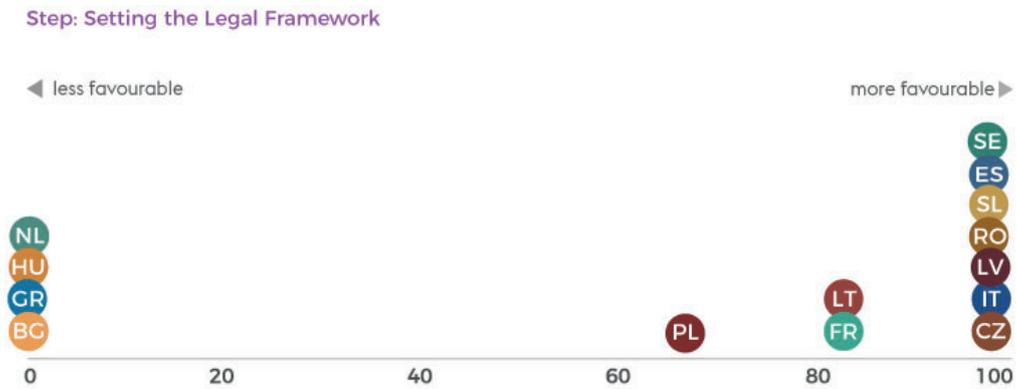


Table 2. Recorded data on the language learning and social orientation policy framework by country with the most favourable trends being presented to the right and the least favourable to the left

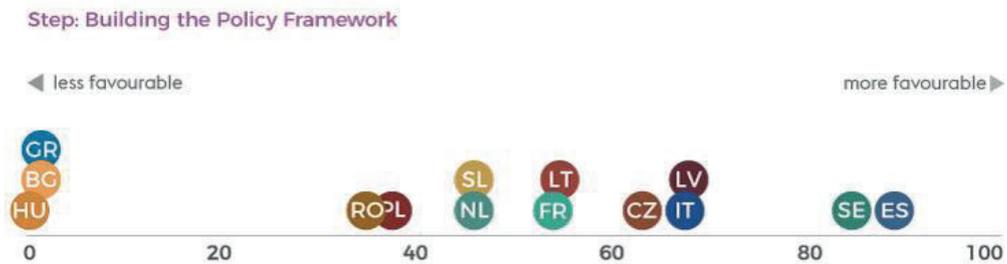


Table 3. General trend of changes from 2017 to 2019 (from top to bottom) with respect to language learning and social orientation legal framework and policy framework configuration

Overall change 2017 to 2019

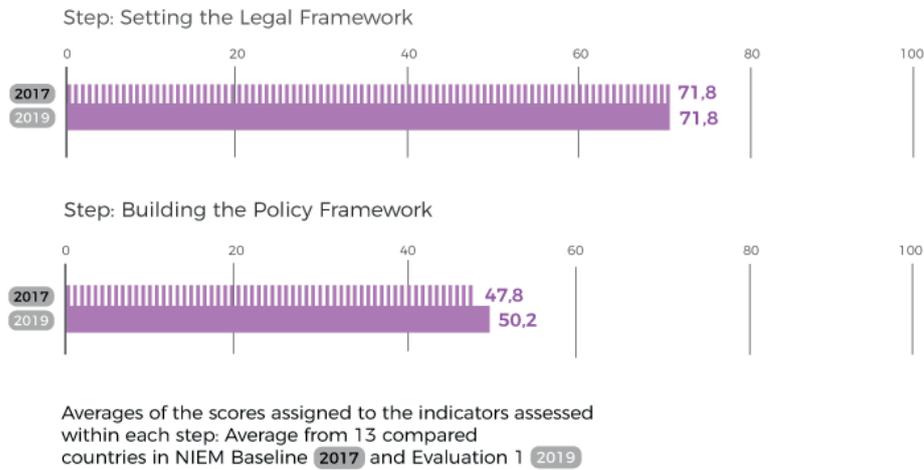


Table 4. General trend of changes on language learning and social orientation by country for 2017-2019 with the most favourable trends appearing to the right and the negative to the left

Overall change 2017 to 2019 by countries



Average of the scores assigned to each step (as the average of the indicators assessed within each step)

9) General integration index for beneficiaries of international protection (Mainstreaming)

Table 1. General integration index trend of changes for 2017-2019 with regard to integration policies and to cooperation

Overall change 2017 to 2019

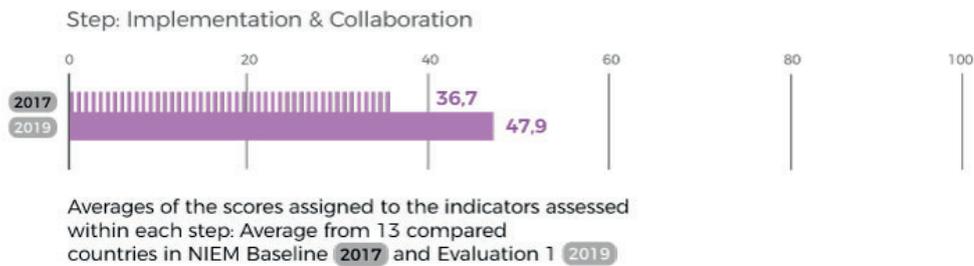


Table 2. General integration index on policy integration and cooperation by country with the most favourable trends being presented to the right and the least favourable to the left

Step: Implementation & Collaboration

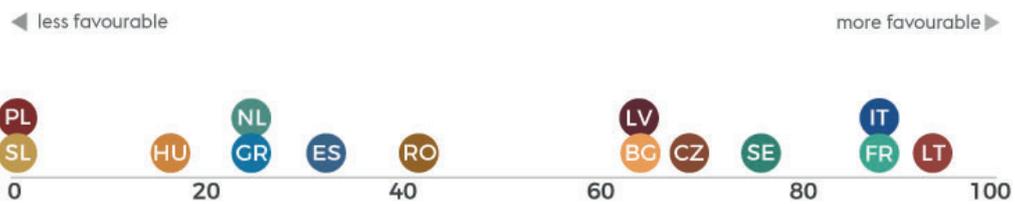
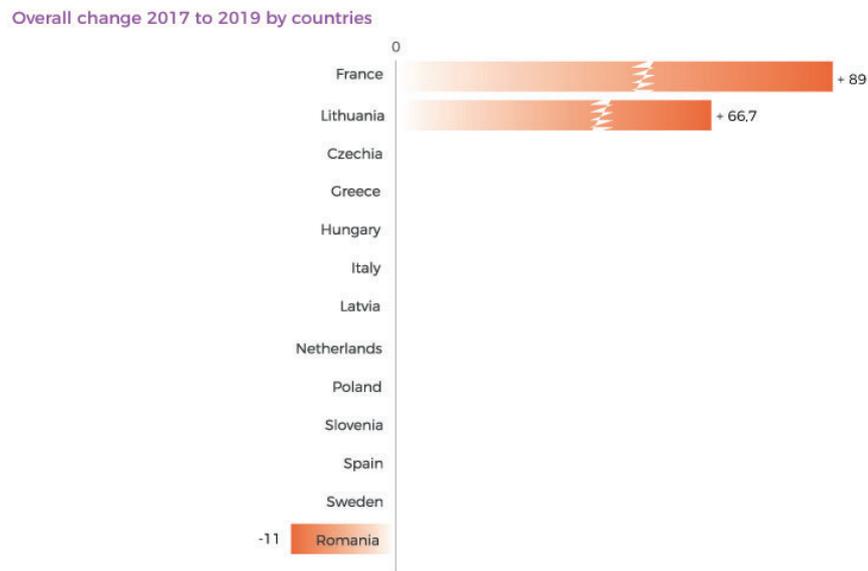


Table 3. General integration index trend of changes by country with the most favourable trends represented on the right and the negative ones represented on the left. (Data from France and Lithuania appear in a gap as national strategies that meet high criteria were adopted in April 2019).



Average of the scores assigned to each step
(as the average of the indicators assessed within each step)

10) Accommodation

Table 1. General trend of changes in accommodation for 2017-2019 (from top to bottom) regarding the legal framework and the policy framework. Dark purple displays data for recognized refugees and light purple for beneficiaries of subsidiary protection.

Overall change 2017 to 2019

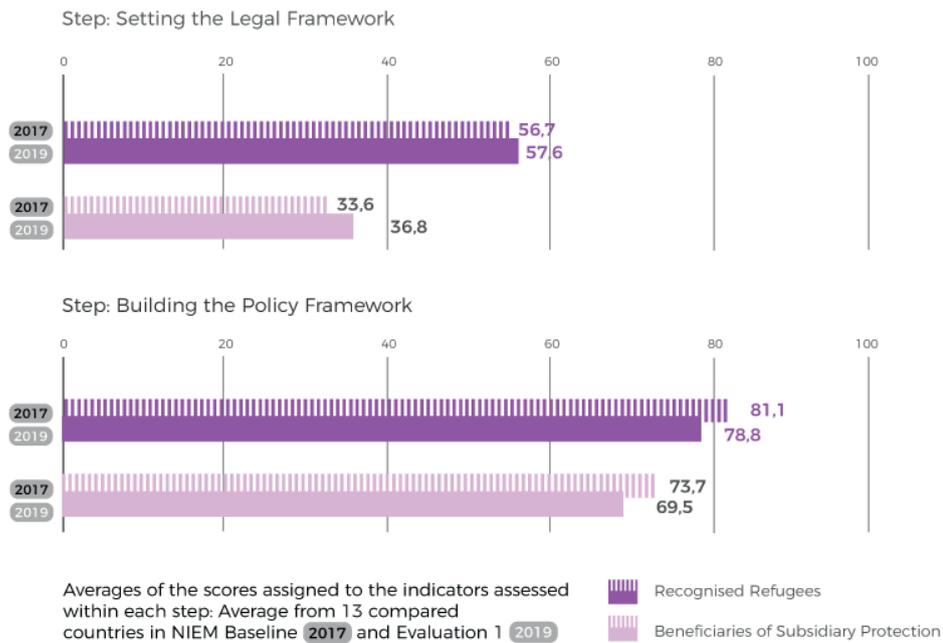


Table 2. General trend of changes in accommodation for 2017-2019 by country with the positive developments represented to the right and the negative to the left.

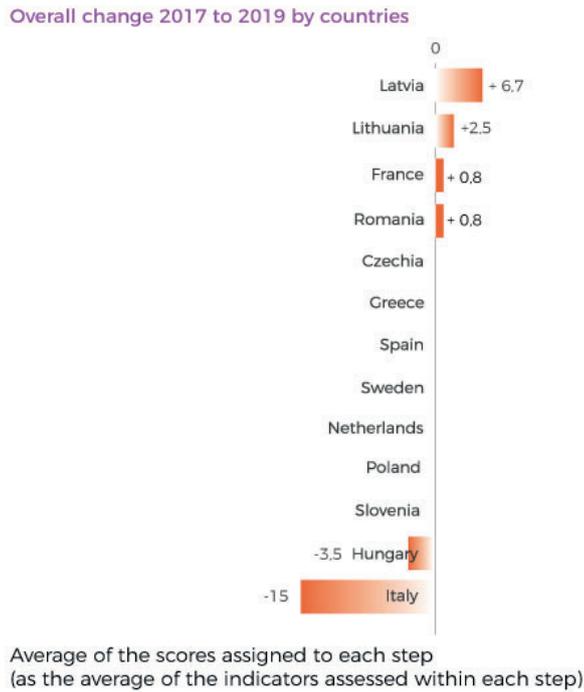


Table 3. Situation of the legal framework concerning accommodation by country. Represented on the right we have the most favourable trends and the least favourable are represented on the left. The data represented above refers to refugees and the data on the bottom represents beneficiaries of subsidiary protection.

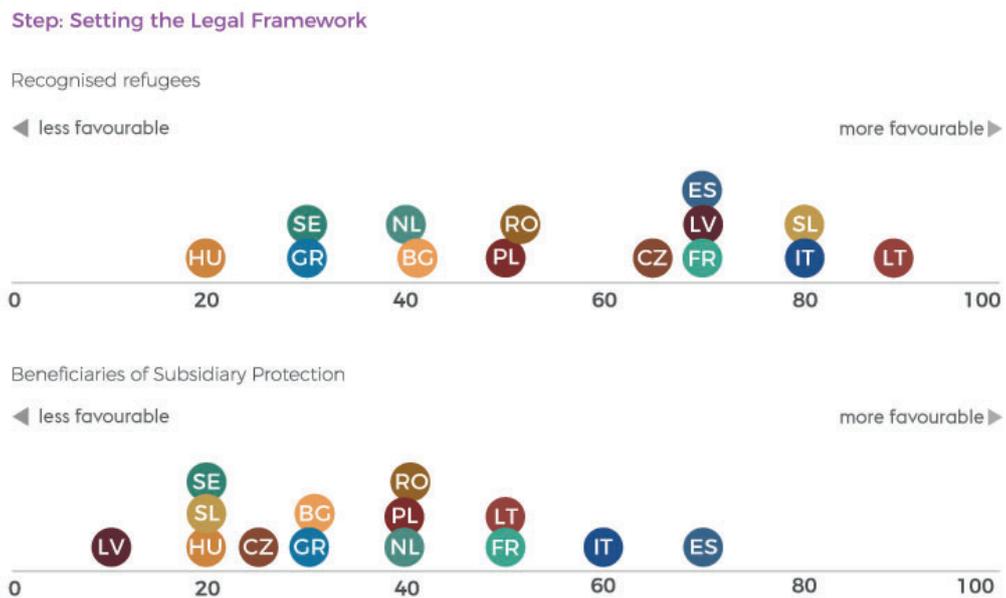
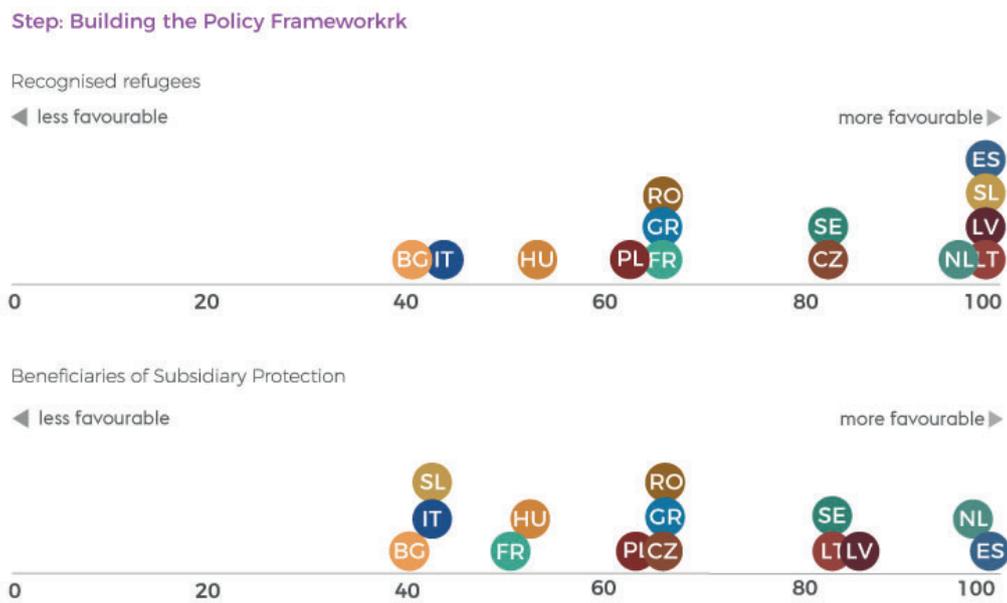


Table 4. Situation of policy framework concerning accommodation by country. Most favourable trends are represented in the right and the least favourable are represented in the left. Refugees are represented in the upper part and beneficiaries of subsidiary protection in the bottom.



11) Social Security

Table 1. Social security legal framework by country. Most favourable trends represented on the right and least favourable on the left.

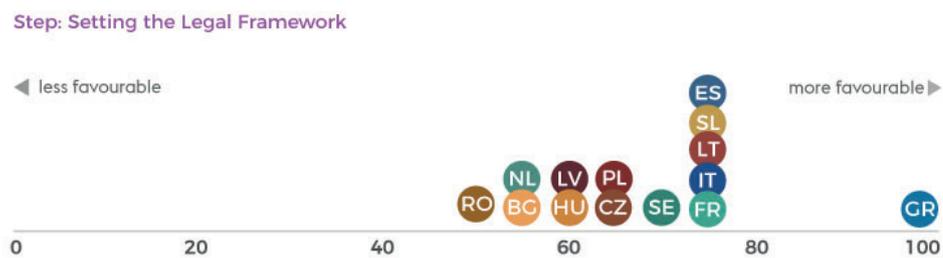


Table 2. Policy integration and cooperation on social security by country. Most favourable trends represented on the right and least favourable on the left.

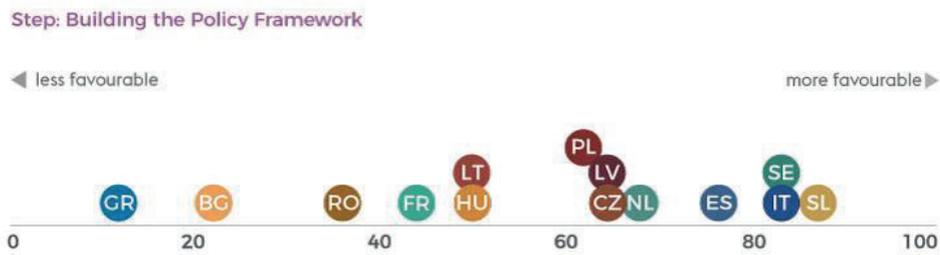


Table 3. General changes for 2017-2019 (from top to bottom) regarding social security legal framework, policy framework and the integration of policies and cooperation.

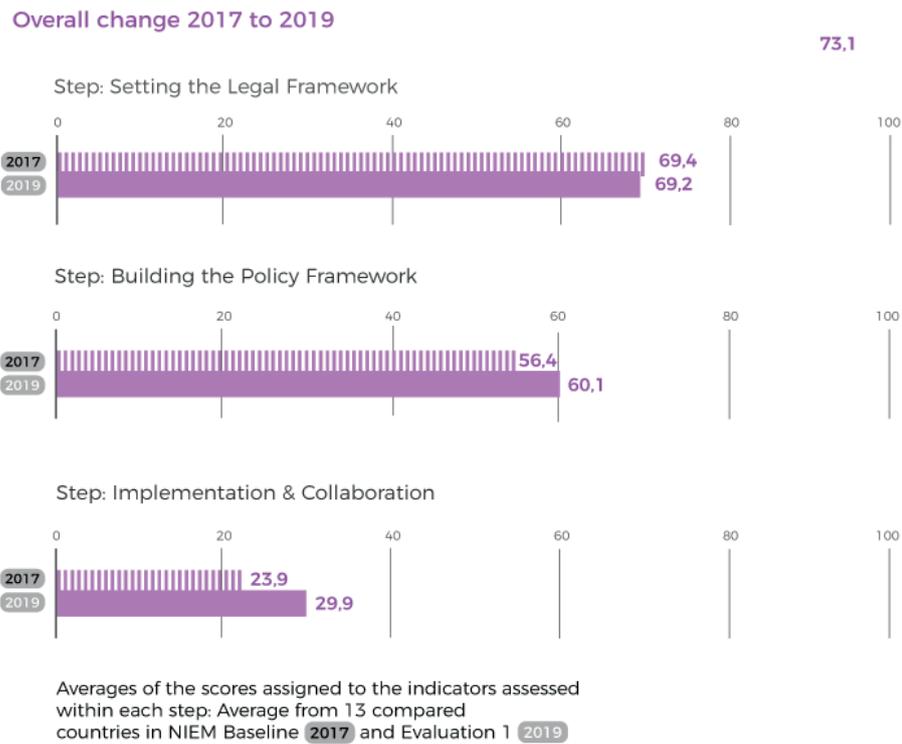
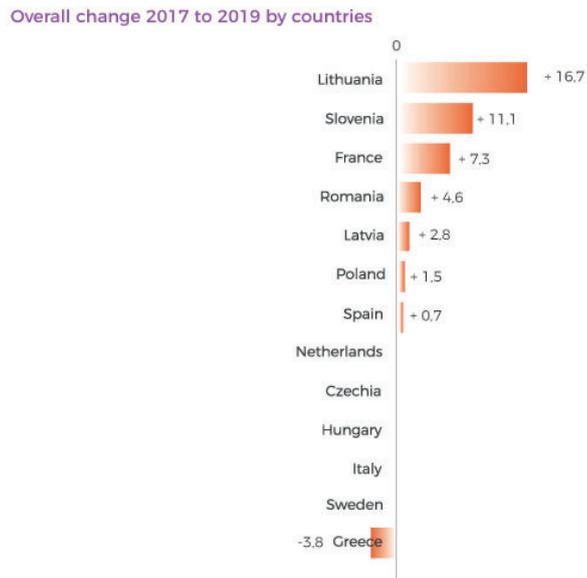
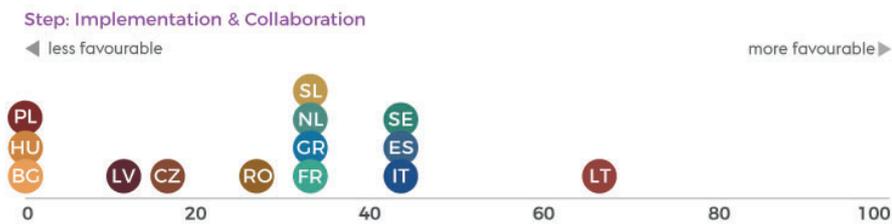


Table 4. Changing trends for social security for 2017-2019 by country. Positive developments represented on the right and negative on the left.



Average of the scores assigned to each step
(as the average of the indicators assessed within each step)

Table 5. Degree of social security policy integration and cooperation by country with the most favourable trends being represented to the right and the least favourable represented the left



12) Vocational Training and Employment

Table 1. Vocational Training and Employment changes for 2017-2019 by country with the favourable trends being represented on the right and the negative trends on the left.

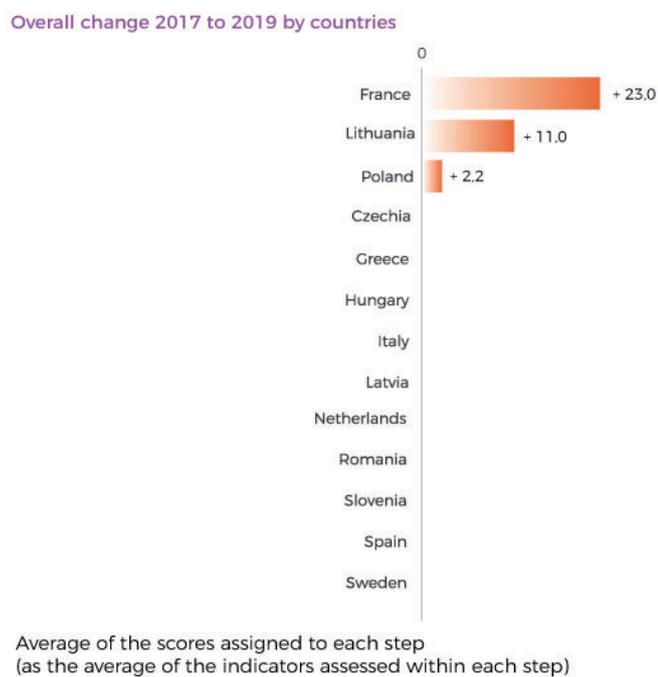


Table 2. Policy integration and cooperation concerning vocational training and employment by country. Most favourable trends being represented on the right and the least favourable on the left

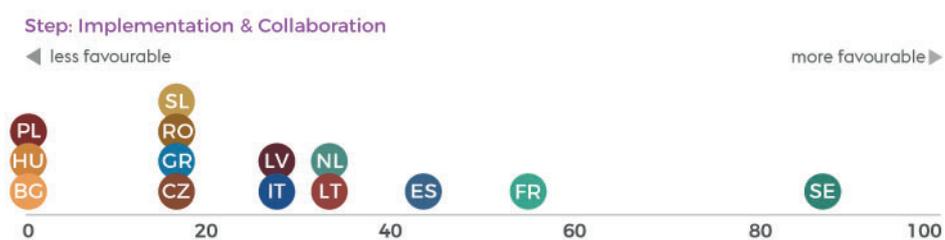


Table 3. Vocational training and employment legal frameworks by country with the most favourable trends being presented to the right and the least favourable to the left

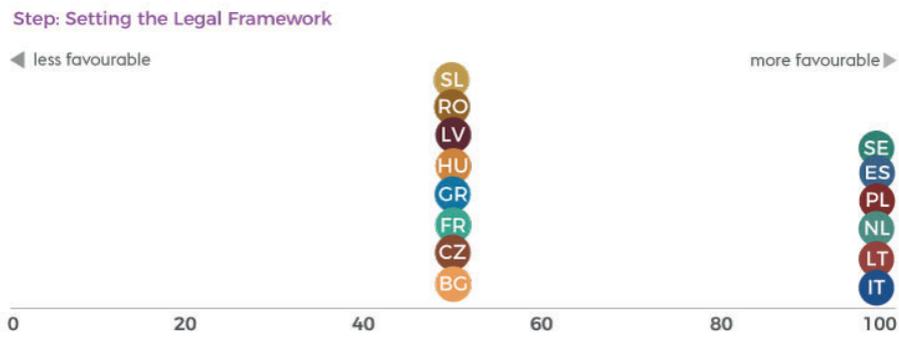


Table 4. Vocational training and employment policy frameworks by country with the most favourable trends being presented to the right and the least favourable to the left

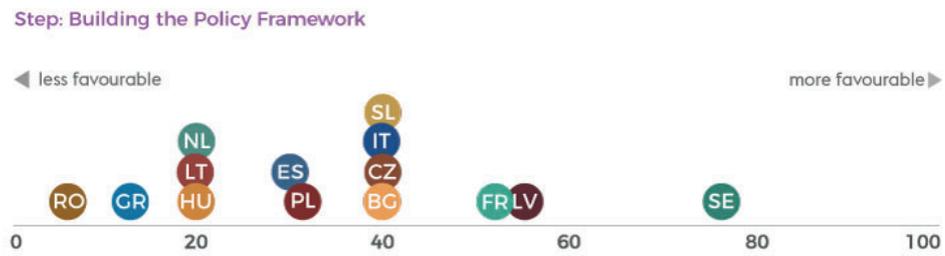
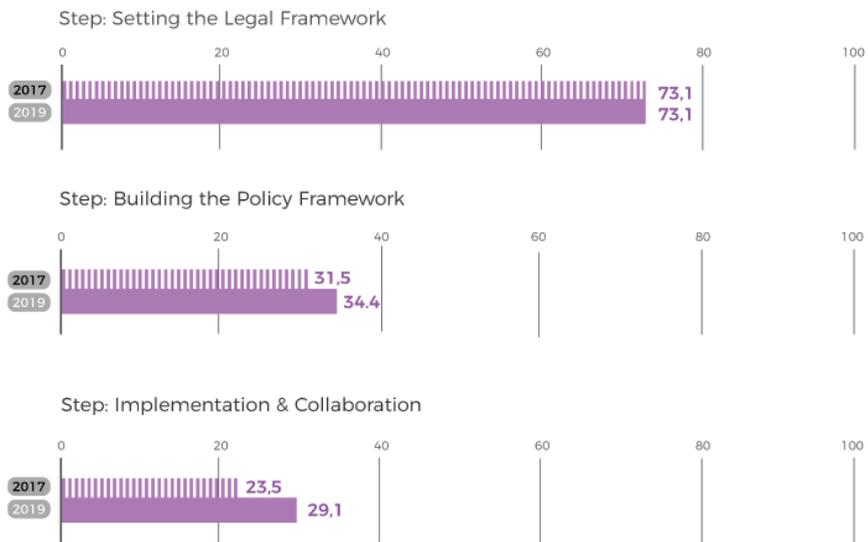


Table 5. Trend of changes for 2017-2019 (from top to bottom) regarding vocational training and employment legal framework, the policy framework and the integration of policies and cooperation.

Overall change 2017 to 2019



Averages of the scores assigned to the indicators assessed within each step: Average from 13 compared countries in NIEM Baseline 2017 and Evaluation 1 2019

4. Most important developments from the first National Strategy for Integration

A) A new National Strategy for Integration

On January 15th 2019, the National Integration Strategy was published²⁰. This text describes all the governmental policies directed to the integration of third country nationals (refugee and immigrant population) in Greek society. The latest strategy of the country dating from 2013 did not result in any specific programme for social inclusion.

The National Strategy was drafted in October 2017 by a working group headed by the Secretary General of Immigration Policy and assisted by the Department of Social Integration of the Ministry of Immigration Policy, by the executives of the Office of the Minister and the Deputy Minister of Immigration, and executives of the Office of the Deputy Prime Minister, and executives of E.E.T.A. (Greek Company of Local Development and Self-government).

Upon its completion in February 2018, the National Strategy for Integration (ΕΣΕ) was put to inter-ministerial consultation and finally approved by the Governmental Council for Social Policy (ΚΥ.Σ.ΚΟΙ.Π) in July 2018.

The text puts forward the vision of the Ministry of Immigration Policy and the subsequent planning for the rights of refugees and immigrants in the context of the mass flow of mixed migratory movements plus applicants for international protection which coexisted with the economic recession of the country during the period 2009-2017.

The strategy in its core sets the integration at the local level and creates the basis for the active involvement of various institutional and/or local actors in the integration process. These are most importantly Municipalities and Regions, effectively making

²⁰ The National Strategy as it was originally formulated is available here (in Greek): <http://www.opengov.gr/immigration/?p=801>, last access 27-5-2020.

the local government a key stakeholder in the shaping and implementation of integration initiatives.

With this aim in mind, it proposes a new policy approach which encourages substantive exchange between different cultures and enhances the positive and developmental impact of integration interventions on local economies and societies. All in all, it lays the foundations for an open and diverse society.

A prerequisite for the implementation of the National Integration Strategy is its general and horizontal coordination to ensure a coherent framework involving the ministries and other bodies relevant for the integration policies. This coordination goes in line with the general governmental initiative to establish national mechanisms for the exercise of an integrated social policy.

Based on the above, the National Integration Strategy briefly describes the phenomenon of migration at both international and national level in relation to the existing integration models in order to put forward a new model for the country. Furthermore, it analyses the national legislation on legal immigration and the asylum and integration policies that have been pursued so far highlighting their policy lines and strategic goals to later propose new actions to achieve them.

Before proceeding with the analysis of the content of the National Strategy, it should be stressed that, since the new National Strategy was adopted after the examination period, it was not taken into consideration for the scoring of NIEM evaluation 1. Nonetheless, the scoring partner, MPG, was informed of this development. Certainly, it is very important for the NIEM programme to have national action plans or national strategies that focus exclusively on the integration of beneficiaries of international protection since their circumstances put them in disadvantage in comparison to regular migrants (e.g. access to government services of the country of origin, persecution, or those who have fled and lost everything related to their life in the country of origin, etc.). This position is also supported by the fact that countries like France and Sweden, which have developed national strategies exclusively for beneficiaries of international protection with actions aimed at their integration, have scored higher in the NIEM evaluation.

The integration policy is, according to the National Strategy, a multidimensional process of different speeds, which is formed around two levels and three target groups:

1. **Reception**, which concerns applicants of international protection for whom the State should provide protection as well as basic material conditions of reception (housing, financial aid, access to health, etc.), immediately after registering them at the entry points. The actions and measures taken in this framework lay the foundations for a successful integration of these people into the host society and also functions as a kind of early integration.

2. **Inclusion**, which concerns both the beneficiaries of international protection and as well as regular migrants for whom the State is required to ensure all the necessary conditions for their successful integration (housing, access to the labour market and to the healthcare system, education, ability to participate in the public life, valid information). The actions and measures are adapted to the needs of each group, hence why these actions are different.

In the case of the newcomer population with international protection status, the integration aims at safeguarding a smooth transition from the early protection status of the applicant until his/her arrival into the host society. This transition is put forward through programmes that combine temporary housing along with the provision of financial aid, courses of Greek language, the possibility of entering the labour market, etc.

Similarly, in the case of the migrant population, integration aims at their faster and more efficient licensing with their return to legal status, ensuring their non-discriminatory access to health, insurance, employment and education. In general, this includes the improvement of the provision of services as well as ensuring their participation in the public life.

The consultation period on the draft National Strategy lasted one month and received a total of 217 comments and 28 different commentators, which proves the great interest sparked by the new national strategy for the integration of third country nationals.

The following is a summary of the comments made by the Greek Council for Refugees (GCR), the UNHCR and SolidarityNow²¹:

The New National Strategy is firstly and foremost a step in the right direction for the formulation of a strategy to achieve the integration of immigrants and refugees in the country. The planning has been generally welcomed by the NGOs active in the field although they note the existence of some gaps and shortcomings²².

One of these gaps is whether the integration is based on solid financial foundations when it comes to facilities. According to an advocate at SolidarityNow, there are problems in the reception facilities. The National Strategy foresees actions related to the improvement of reception conditions such as the upgrading of hotspots through staff recruitment, improving infrastructure and electronic equipment to speed the registration process²³. Respectively, it there is plan to strengthen the Asylum Service with additional staff, especially when it comes to the legal assistance for the applicants, infrastructure for housing of unaccompanied minors and recruitment for the overall necessary services such as interpretation, psychosocial support, etc. However, even if these measures are implemented, it does not mean that the situation on the islands will change drastically.

The central role of the National Integration Strategy is assigned to the local government and especially the municipalities. It is proposed, for example, that each municipality prepare an action plan for the integration which shall later be submitted to the Ministry of Immigration Policy with the aim to put forward a better distribution mechanism for a more proportional accommodation of refugees, to create a national financial programme for integration and to expand the Immigrant Integration Centres

²¹ See on Solidarity Now. Strategy for the Integration of Refugees and Immigrants, 05-02-2019. Available here: <https://www.solidaritynow.org>. Last accessed 27-5-2020.

²² See website for the draft National Strategy: <http://www.opengov.gr/immigration/?p=801>. Last accessed 27-5-2020.

²³ See National Strategy for Integration: Policy Measure 1.1: Upgrading and supporting the operation of Open Hosting Structures and Reception and Identification Centers (K.Y.T.), p. 38 ff., <http://www.opengov.gr/immigration>. Last accessed 27-5-2020

beyond the existing 9 municipalities, and each municipality should aim to create a special electronic platform to inform immigrants and refugees²⁴.

The National Strategy proposes that housing, which is one of the most important policy areas for integration and for years now lacks a cohesive planning, should include an extension of the UNHCR apartment programme in place for asylum seekers. This extension will mean the gradual expansion of the pilot programme for the housing 5,000 recognized refugees. It also offers the possibility of expanding social housing offered by municipalities, which relates to all citizens²⁵ and foresees the housing of refugees in rural areas with a declining population to improve their demographic numbers. The now official involvement of the municipalities in the issue of integration is welcome since in practice this is exactly what has been happening for many years often in cooperation with civil society²⁶. However, this also carries the risk of a lack of political will as well as the necessary resources since it is not specified in the text of the strategy if these proposals will be binding for the municipalities or whether their participation will be optional. This is a realistic concern especially taking into account the "resistance" of local governments these last years in receiving applicants for international protection in order to decongest the Aegean islands²⁷.

An advocate of the UN High Commissioner for International Protection comments on the clarification of the issue of housing which is a key factor for integration affecting other areas as well for both asylum seekers and recognized refugees:

²⁴ See on National Integration Strategy: Policy measure 1.1: Promoting cooperation between central government and local government, p. 43 ff., available here: <http://www.opengov.gr/immigration/wp-content/uploads>. Last accessed 27-5-2020.

²⁵ See related programs "Housing and Reintegration" and "Housing and Work for the homeless", a general plan for homeless in general in Greece, <http://www.astegoi.gov.gr/index.php/en/gia-polites/stegasi-ergasia>.

²⁶ Panteion University of Social and Political Sciences, final document of the project of the program "Housing-Reintegration", 2017, available on the website: <https://www.eiead.gr/publications/docs> 27. Last accessed 27-5-2020.

²⁷ From *Kathimerini*, "Refugee: Trip from the islands", 22-09-2018, <https://www.kathimerini.gr/986049/article/epikairothta/ellada/prosfygiko-metakinhseis-apo-ta-nhsia>. Last access 27-5-2020. From *Ta Nea*, "The transfer of refugees inland continues, despite the reactions of the residents", 4-11-2019, <https://www.tanea.gr/2019/11/04/greece/synexizetai-i-metafora-prosfygon-stin-endoxora-para-tis-antidraseis-ton-katoikon/>. Last accessed 27-5-2020.

" Greece has [very] good legislation for asylum seekers, but it is often rendered null by the inability to implement what is provided for in law. For example, in theory they are beneficiaries of the social solidarity allowance, but in order to get it, they have to declare a house, either their own, or one they rent, or that they are hosted, and this does not happen until today, since there is no social housing²⁸".

Prior to the outbreak of the refugee crisis and during the increase in refugee flows in 2015, no single social housing policy was envisaged for refugees and migrants²⁹.

The National Strategy presents the implementation of a housing pilot programme for 5,000 recognized refugees that will last 6 months and which includes a provision of a financial allowance that will be given simultaneously³⁰. The strategy proposes the geographical extension of the program, but its temporal extension is also deemed necessary: "*The period of six months is short in order to achieve the integration of the beneficiaries of international protection and to be completely autonomous, an extension is needed. However, it is a principle and a framework that had not existed before until now* ", points out the coordinator of the legal service of the GCR³¹.

Along with housing, employment is also an important factor for integration into society. When it comes to employment, the National Strategy specifically provides guidelines for the mapping of professional skills, the creation of a special information system, the establishment of professional advisers for refugees and migrants, the possibility of employment in agricultural work and also the possibility of establishing

²⁸ See on Solidarity Now, ERA: STRATEGY FOR THE INTEGRATION OF REFUGEES AND IMMIGRANTS, 05-02-2019, available here: <https://www.solidaritynow.org/>. Last accessed 27-5-2020.

²⁹ See Panteion University of Social and Political Sciences, final document of the project of the program "Housing-Reintegration"2017, available on the website: <https://www.eiead.gr/publications/docs>. Last accessed 27-5-2020.

³⁰ This is the HELIOS Program, see on National Strategy for Integration, Policy Measure 1.4: Reception and Integration at Local Level, p. 47, <http://www.opengov.gr/immigration/wp-content/uploads/downloads/>. Last accessed 27-5-2020.

³¹ See on Solidarity Now, ERA: STRATEGY FOR THE INTEGRATION OF REFUGEES AND IMMIGRANTS, 05-02-2019, available here: <https://www.solidaritynow.org/>. Last accessed 27-5-2020.

small businesses³². However, significant barriers to access to the workplace and employment must be overcome first, such as the issuance of AMKAs (Social Security Registration Number) or bank accounts, both recognised as a refugee rights but often neglected in practice³³.

A key element for the integration of beneficiaries of international protection, emphasized by the NIEM programme but ignored in the text of the National Strategy, is that of citizenship. At the same time, the strategy refers to actions specifically designed for the second generation such as facilitating second chance schools for those who left their studies, to empower them (especially women), to take positions of responsibility. The image, however, that is projected for the second generation caused the concern of Generation 2.0 organization, since it presumes that these people have a lower educational and economic level.

In its announcement³⁴, the organization notes that:

"From the time of the previous National Strategy for Integration (2013) until today, it is indisputable that progress has been made in the institutional

³² See on National Strategy, Policy Measure 4.1: Recording and recognition of qualifications and skills, Policy Measure 4.2: Facilitating access to the labor market, Policy Measure 4.3: Promoting entrepreneurship, p. 63 ff., <http://www.opengov.gr/immigration/wp-content/uploads/downloads/2019/07/>

³³ iefimerida.gr, changes in the strict regime of granting AMKA to immigrants -The plan of the Ministry of Labor, 3-10-2019, <https://www.iefimerida.gr/ellada/yp-ergasias-allazei-kathestos-amka-gia-metanastes>. Last access 27-5-2020; To Vima, Greek Council for Refugees: Obligation of the State to grant AMKA, 07-10-2019, <https://www.tovima.gr/2019/10/07/society/elliniko-symvouliao-gia-tous-prosfyges-ypoxreosi-tis-politeias-i-xorigisi-amka/>, last access 27-5-2020; GCR, Press Release, JOINT REPORT 25 ORGANIZATIONS FOR VIOLATION OF THE RIGHTS OF ASYLUM APPLICANTS, <https://www.gcr.gr/el/news/press-releases-announcements/item/689-koini-anafora-25-organoseon-gia-peristatika-paraviasis-dikaiomaton-ait-asylo>, last access 27-5-2020; GCR, Press Release, Obstacles to the AMKA issue for asylum seekers continue, even for children, 7-10-2019. <https://www.gcr.gr/el/news/press-releases-announcements/item/1276-synexizontai-ta-proskommata-stin-ekdosi-amka-gia-tous-aitoyntes-asylo-akoma-kai-gia-paidia>. Last accessed 27-5-2020.

³⁴ Gen.2.0, The remarks of ASET for the National Strategy for Integration, 18-2-2019, <https://g2red.org/el/aset-s-observations-on-the-national-integration-strategy/>. Last accessed 27-5-2020. See as well on Solidarity Now, ERA: STRATEGY FOR THE INTEGRATION OF REFUGEES AND IMMIGRANTS, 05-02-2019, available here: <https://www.solidaritynow.org/>. Last accessed 27-5-2020.

treatment of the second generation. Today, in contrast to 2013, there is legal coverage, which provides access to citizenship, but there are vital issues that are not addressed, while at the same time creating a problematic profile of the second generation (...). Given the characteristics, peculiarities and the needs of this group we would like, for example, instead of the lower economic and educational profile, to have looked at the socio-economic mobility of that group. Instead of school dropout, [we should examine] whether the education system is adapted to the multicultural reality. Instead of reducing an entire generation of immigrant children, we would like to have seen targeted actions to address the social exclusion and racism experienced by this particular group of people. Also, something that would be really interesting in a Second Generation Integration Strategy would be its own contribution to their parents' integration, which is happening anyway. This would have been a holistic approach based on reality, but also on those experiences, of this "invisible" generation. And one last thing about the phrase "second generation immigrants". "How many times do we have to say that the second generation are not immigrants?"

To conclude, it can be said that the strategy for the integration of immigrants and refugees in the country, despite some problematic issues, seems to be accepted by the relevant social actors³⁵. The key, however, is ultimately its implementation. Therefore, the implementation of programmes that have already been announced must proceed to be able to evaluate the effectiveness of the National Strategy, which will also be the subject of future consideration in the light of the NIEM programme.

B) The asylum procedure and the implications of the EU-Turkey Agreement

According to the GCR, the EU-Turkey statement resulted, *inter alia*, in a de facto division of asylum procedures applied in Greece³⁶. Asylum seekers arriving in the

³⁵ See on Solidarity Now, ERA: STRATEGY FOR THE INTEGRATION OF REFUGEES AND IMMIGRANTS, 05-02-2019, available here <https://www.solidaritynow.org>.

³⁶ About AIDA, see Country Report: Greece, March 2019 Update, available in English: <https://www.asylumineurope.org/reports/country/greece>. Last accessed 27-5-2020.

Greek islands after 20 March 2016 are subject to a Fast Track Procedure. The United Nations Special Rapporteur on the human rights of migrants stressed in 2017 that the provision of emergency derogation measures for asylum seekers at the border raise "serious concerns about guarantees of due process³⁷". In 2018, the European Ombudsman noted that *"there are genuine concerns about the quality of the admissibility interviews as well as about the procedural fairness of how they are conducted"*³⁸. In February 2019, the Fundamental Rights Agency notes that *"As almost three years of experience in Greece shows, this approach creates fundamental rights challenges that appear almost unsurmountable"*³⁹. The fast-track procedure was particularly affected by the appeal proceedings.

The legal framework for the establishment of the Appeals Authority was amended twice in 2016 by Law 4375/2016 in April 2016 and by Law 4399/2016 in June 2016 and then in 2017 by Law 4661/2017. These amendments are closely linked to the examination of appeals under the fast-track border procedure, following the pressure on the Greek authorities from the EU to implement the EU-Turkey statement⁴⁰ and *"coincide in time with the adoption of positive decisions by the functioning Appeals Committees (for their judgment on admissibility) which, in the context of an individual examination of appeals, decide that Turkey is not a safe third country for these applicants"*⁴¹, as highlighted by the Greek National Commission on Human Rights.

³⁷ Regarding Human Rights Council, see the report of the Special Rapporteur on the human rights of migrants on his mission to Greece, A / HRC / 35/25 / Add.2, 24 April 2017, para. 78.

³⁸ See 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, 5 July 2018, available at: <https://www.ombudsman.europa.eu/el/decision/en/98711>. Para. 46, Last accessed 27-5-2020.

³⁹ FRA, Update of the 2016 the European Union Agency for Fundamental Rights opinion poll on fundamental rights in the 'hotspots' set up in Greece and Italy, 3/2019, 4 March 2019, <https://fra.europa.eu/en/publication/2019/update-2016-fra-opinion-fundamental-rights-hotspots-set-greece-and-italy>. Last accessed 27-5-2020.

⁴⁰ See on the public statement by GNHCR on the amendment that changes in the composition of the Independent Appeals Committees, 17-6-2016, available here: [http://nchr.gr/images/pdf/apofaseis/prosfuges_metanastes/Dimosia%20dilwsi%20EEDA .pdf](http://nchr.gr/images/pdf/apofaseis/prosfuges_metanastes/Dimosia%20dilwsi%20EEDA.pdf). Last accessed 27-5-2020.

⁴¹ Ibid.

Further amendments to the procedure of the Appeals' Committees established by Law 4540/2018 reflect the joint action plan for the implementation of the EU-Turkey Statement of 2016. They are clearly linked to the pressure to restrict appeals and the fast-track procedure⁴². This is translated into the possibility of replacing the judicial members of the Appeals Committee with a joint ministerial decision in case of significant and unjustified delays in the examination of appeals always with the approval of the General Commissioner of the Administrative Courts⁴³.

On the other hand, according to article 60 paragraph 4 of law 4375/2016, appeals against decisions taken under the fast-track border procedure must be submitted to the Appeals authority within 5 days, instead of the 30-day deadline stipulated in the regular asylum procedure.

The right of appeal during the fast - track procedure was further restricted by a police circular issued in April 2017⁴⁴. According to the recommendations of the European Commission Joint Action Plan of 8 December 2016 on the removal of administrative barriers to the fast-track voluntary return from the islands, when a negative first instance decision is made, asylum seekers either have the right to appeal against it or withdraw the appeal and benefit from the voluntary return and reintegration programme provided by the International Organization for Migration (IOM). Hence, if they choose to appeal against the negative decision, they lose the possibility of a future voluntary return. Fifteen organizations have denounced this policy, as it jeopardizes the right to a fair asylum procedure under EU law and the right to return

⁴² See in European Commission Joint Action Plan on Implementation of the EU-Turkey Statement, 8 of December 2016. https://ec.europa.eu/commission/sites/beta-political/files/december2016-action-plan-migration-crisis-management_en.pdf. Last accessed 27-5-2020.

⁴³ Articles 5 (4) of Law 4375/2016, as amended by Article 28 (3) of Law 4540/2018.

⁴⁴ Hellenic Police, Circular no. 1604/17/681730, Implementation of the EU-Turkey Joint Declaration (Brussels, 18-3-2016) Participation of foreign nationals applying for international protection status in the voluntary repatriation programs of the International Organization for Migration (IOM). 3-4-2017, https://www.synigoros.gr/resources/docs/20170512-egkyklios-el_as.pdf. Last accessed 27-5-2020.

to the country of origin⁴⁵. This circular remains in force since 2018. However, statistics available on the number show that its implications remain limited in practice⁴⁶.

The Appeals' Committee, which examines the appeal during the fast-track procedure, must deliver a decision within 3 days⁴⁷, instead of 3 months as foreseen during the regular procedure. Nevertheless, the decision-making process of the Appeals' Committees is generally very slow⁴⁸. The procedure before the Appeals Committees is written based on article 60 paragraph 4 of Law 4375/2016 and it is up to the respective Appeals Committee to request the hearing of the applicants under the same conditions as those of the regular procedure.

It should be noted that the recognition of Turkey as a "safe third country" also had a significant impact on the number of appeals received. According to the GCR after the amendment of the composition of the Appeals Committees, 98.2% of the decisions issued by the Independent Appeals Committees in 2017 justified the primary decisions on inadmissibility based on the concept of a safe third country. The same thing happened in 2018. The independent appeals committees issued 78 rejection decisions on the Syrian appeals as inadmissible on the basis of the concept of a safe third country. Only two cases of Syrian Kurdish families from the Afrin region, were accepted by the Appeals Committees based on the ruling that Turkey was not a safe third country⁴⁹.

⁴⁵ActionAid and others: 15 NGOs Decry New Policy Limiting Asylum Seekers in exercising their Right to Appeal, 9-5-2017. Available in English here: <https://www.gcr.gr/index.php/en/news/press-releases-announcements/item/662-final-joint-ngo-statement-on-avrr>. Last accessed 27-5-2020.

⁴⁶ See AIDA Country Report: Greece, March 2019 Update, available in English: <https://www.asylumineurope.org/reports/country/greece>. Last accessed 27-5-2020.

⁴⁷ Article 60 (4) (e) of Law 4375/2016.

⁴⁸European Commission, Seventh report on the progress made in the implementation of the EU-Turkey statement, COM (2017) 470, 6-9-2017, https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/20170906_seventh_report_on_the_progress_in_the_implementation_of_the_eu-turkey_statement_en.pdf. Last accessed 27-5-2020.

⁴⁹ 9th Appeals Committee, no. 20802 / 25-9-2018 and 20898 / 26-9-2018 decisions, available in English here: https://www.refworld.org/cases,GRC_ACA,5bc8c2a64.html. Last accessed 27-5-2020.

Regarding vulnerable groups in the context of the reception process, article 20 of Law 4540/2018 introduced more categories of vulnerable applicants, such as people with mental disorders and victims of female genital mutilation. However, people with post-traumatic stress disorder (PTSD) are not explicitly mentioned in this list. Article 23 of Law 4540/2018 also modified the certification process of persons subject to torture, rape or other serious forms of violence.

From the middle of 2017, the Centre for Disease Control and Prevention (KEELPNO), as a public body of the Ministry of Health, carried out a medical examination and psychosocial evaluation in the context of reception and identification procedures. In 2018, due to the fact that KEELPNO units in KYT (reception and identification centers for refugees) remained significantly insufficient, there were significant delays in recognizing the vulnerability of new arrivals on all islands. As noted by the EU Fundamental Rights Agency:

“ The time it takes to assess if a person is or is not vulnerable under Greek law varies considerably depending on the number of new arrivals, but also on the availability of professionals and interpreters. Insufficient number of doctors, psychologists (but also lack of space for them to have confidential interviews and examinations) as well as significant delays in recruiting interpreters (see Part I of this FRA Opinion) limit the impact of these measures, leading to months of delays in some hotspots.⁵⁰”

According to the findings of the GCR⁵¹, these delays and sometimes the dysfunctional recognition of procedures in 2018 have led to a significant number of asylum procedures being initiated without assessing applicants' vulnerability. In short, this

⁵⁰ FRA, 2016 update on the opinion of the European Union Agency for Fundamental Rights on fundamental rights in the 'hotspots' in Greece and Italy, 3/2019, 4 March 2019, <https://fra.europa.eu/en/publication/2019/update-2016-fra-opinion-fundamental-rights-hotspots-set-greece-and-italy>. Last accessed 27-5-2020.

⁵¹ About AIDA see Country Report: Greece, March 2019 Update, available in English: <https://www.asylumineurope.org/reports/country/greece> Last accessed 27-5-2020.

showed “systematic failure in the identification and protection of vulnerable people, particularly on the islands.”⁵².”

Finally, in 2018 the general provisions for court appeals were revised, which also apply to the fast - track procedure. Electronic notification of the decisions of the Appeals Committees was provided without, however, regulating the suspensive effect of the application for annulment to the administrative courts⁵³. In order to suspend any return / deportation operation, a request for suspension must be submitted simultaneously with a request interim measures. This is particularly problematic for the right to a fair trial given the tight time frame imposed by the fast - track process.

C) The new guardianship system for unaccompanied minors

An important development has taken place since we published the first National Report for the NIEM programme regarding the support system for 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 foreigner or stateless person under the age of 18, who arrives in Greece without being accompanied by a relative or a person who exercises parental custody or guardianship. The Juvenile Prosecutor or the local competent Prosecutor of the Court of First Instance – if there is no juvenile prosecutor- is considered a temporary guardian of the unaccompanied minor. This responsibility includes, inter alia, the appointment of a permanent guardian for the minor⁵⁴. The minor’s guardian is selected from a Register of Approved Guardians established at the

⁵²See also 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, available at: <https://rm.coe.int/report-on-the-visit-to-greece-from-25-to-29-june-2018-by-dunja-mijatov/16808ea5bd> para. 46. Last accessed 27-5-2020.

⁵³About AIDA see Country Report: Greece, March 2019 Update, available in English: <https://www.asylumineurope.org/reports/country/greece>. Last accessed 27-5-2020.

⁵⁴ Article 16 of Law 4554/2018 .

National Center for Social Solidarity (EKKA)⁵⁵. In addition, the law adopts the best interests of the child in determining the appropriate procedure⁵⁶.

The Act also creates the Supervisory Board for the Guardianship of Unaccompanied Minors, which is responsible for ensuring the legal protection of unaccompanied children with regards to disability, religious beliefs and guardianship issues⁵⁷. In addition, the law establishes the Directorate for the Protection of Unaccompanied Minors at EKKA as the body responsible for guaranteeing the safe housing of unaccompanied children and for evaluating the quality of services provided in such accommodations⁵⁸.

D) Housing

As in the previous examination period, housing for asylum seekers continued to be provided under the UNHCR ESTIA programme.

The UNHCR in cooperation with the Greek Government, Local Government and Non-Governmental Organizations provides housing and financial support through prepaid cards for refugees and asylum seekers in Greece, under the Emergency Support Program and Housing – ESTIA. The ESTIA programme, funded by the European Union Civil Protection and Humanitarian Aid, for the accommodation of refugees is implemented by the Municipalities of Athens, Thessaloniki, Larissa, Trikala, Karditsa, Livadia, Philadelphia - Chalkidona, Heraklion, Chania, Rethymno, Agios Nikolaos and the Municipality of Tripoli. By the end of 2018, 5,649 beneficiaries of international protection secured their accommodation in apartments through the UNHCR programme and 11,000 received cash assistance. As of March 17, 2020, 25,529 housing units had been created in Greece for refugees and asylum seekers. In addition,

⁵⁵ Ibid.

⁵⁶ Article 21 of Law 4554/2018: «1. Every decision of any of the bodies of the committee is taken after evaluation of the best interest of the unaccompanied minor ... »

⁵⁷ Article 19 of Law 4540/2018.

⁵⁸ Article 27 of Law 4540/2018

as of March 17, 21,793 people are housed in the Programme, among them 6,563 recognized refugees⁵⁹.

It should be emphasized that the ESTIA housing programme is dedicated to the most vulnerable applicants and therefore cannot help recognized refugees who do not meet the vulnerability criteria or beneficiaries who have not already participated in the programme as applicants. In addition, accommodation is provided only for a limited transitional period.

A critical development took place with the issuance of a Ministerial Decision by the Ministry of Immigration Policy No. 6382/19 / 12-03-2019 (B '853) for the regulation of the ESTIA system and the provision of details regarding the conditions and deadlines regarding the accommodation of asylum seekers and the beneficiaries of international protection in it. The above decision in Article 9 stipulates that:

“1. The benefits under the program continue automatically for a period of six (6) months from the delivery of the recognition decision and if this is not possible, from the expiration of the application form for international protection. This period can be more than six months until the end of the current school year for families with minor members attending primary and secondary education. 2. The benefits continue beyond the semester and in the cases of beneficiaries a) in advanced or threatened pregnancy and in childbirth until the completion of two months from the birth. In this case, the benefits continue for family members with first degree kinship, b) without family support network, who face incurable or malignant diseases, until they are referred to appropriate public health and rehabilitation structures, c) families with a member facing very serious health conditions, which make it absolutely necessary not to change the environment due to the risk to life, d) whose inclusion in the programme is required for compelling humanitarian reasons. All the above reasons are documented based on a relevant suggestion of the programme manager. 3. Beneficiaries of international protection who, as adults, reside in unaccompanied minors or temporary accommodation for unaccompanied minors shall receive financial assistance for six months after leaving those centres or places. For those who

⁵⁹ See on UNHCR, March Update, ESTIA-Housing, <http://estia.unhcr.gr/en/estia>. Last accessed 27-5-2020.

have vulnerabilities or continue their studies in public and private structures of secondary, higher or vocational, formal and non-formal education, in which they are enrolled, reference may be made to housing locations of the programme. In this case, the financial aid and the housing are provided for a period of six months from their placement in the housing system, or more than that, in order to complete the current educational year. 4. Throughout their accommodation under the programme and in particular at the above intervals, the beneficiaries are obliged to cooperate in accordance with the Rules of Procedure of the programme for the planning of their individual integration plan and for the execution of the relevant administrative procedures, such as, in particular, registration in the Tax and Social Security Registry, opening a bank account and registration in employment or social protection organizations. Similarly, the implementing partner of the programme ensures that the beneficiaries of international protection social and welfare protection measures or housing assistance provided by the Greek authorities, benefit, if necessary. 5. The competent host authority may set as a condition for the continuation of the benefits the participation of the beneficiaries in the provided integration actions, such as the attendance of Greek language courses or other actions. 6. With the expiration of the periods provided for in the above paragraphs, the cessation of benefits occurs automatically”.

Thus, according to this, those who had already benefited from the ESTIA programme as asylum seekers, have the opportunity to be accommodated for another 6 months after receiving the decision that provides protection, while in the case of families with children, this period could be extended to the end of the school year. The stay could be extended beyond 6 months after recognition in the cases of extremely vulnerable recognized refugees, such as pregnant women up to two months after giving birth or people suffering from very serious health conditions. A transitional period is also provided for the support of unaccompanied minors who benefit from the programme, when they reach adulthood. Unaccompanied minors are to be supported with the extension of housing and financial assistance for a period of six months or until they complete their studies.

During the review period, the HELIOS project was created as a pilot programme aimed at examining the possibilities of implementing decentralized integration policies for

refugees and immigrants⁶⁰. Implemented under the coordination of the Ministry of Immigration Policy in collaboration with the Municipalities of Livadia and Thebes and the International Organization for Migration (IOM), this programme took advantage of measures already being implemented such as education, financial assistance, housing, combining them with new support actions related to professional life, social ties and social participation.

During the pilot phase, operations relating to a sample refugee population and immigrants, approximately 80 and 40 people in Livadia and Thebes respectively. The two Municipalities offered different housing options: apartments in Livadia and open accommodation structure in Thebes.

The initial duration of the programme was set at six months with the possibility of extension for another six months if it is deemed necessary and if the funding is secured. The aim of the pilot programme is to create a model for the integration of refugees and immigrants that can be applied throughout the country.

At the end of the pilot programme, the Ministry announced its extension and expansion, starting from June 2019, with the HELIOS 2 program. The second programme, which was not considered for evaluation under Evaluation 1, is listed in table:

⁶⁰ About HELIOS see Program Presentation here: <https://government.gov.gr/parousiasi-programmatos-helios-gia-tin-kinoniki-entaxi-prosfigon-ke-metanaston/>. Last accessed 27-5-2020.

HELIOS-Hellenic Integration Support for Beneficiaries of International Protection

Duration : June 2019 - November 2020

Description : In close cooperation with the national authorities and experienced Partners, through the HELIOS project , IOM aims to promote the integration of beneficiaries of international protection residing in temporary housing programmes in Greek society through the following elements:

Integration Courses: Conducting Integration Courses in Learning Centers throughout Greece. Each course lasts 6 months and consists of modules for learning the Greek language, cultural orientation, preparation for employment and life skills.

Accommodation support: Support for beneficiaries for independent accommodation in apartments rented in their name. This also includes contributing to rental and travel expenses and networking with apartment owners.

Employment Support: Providing individual employment counselling and job preparation including access to work-related certifications and networking with private employers.

Integration Assessment: Regular assessment of the progress of the beneficiaries' integration to ensure that they will be able to "navigate" confidently among Greek public service providers as soon as they leave the HELIOS project to live independently in Greece.

Raising the awareness of the host community: Organizing workshops, activities and events and producing a national campaign to create opportunities for the exchange of experiences between the host and host communities, emphasizing the value of the integration of immigrants in Greek society.

Purpose: The aim of the project is twofold: Firstly, it aims at increasing the prospects of beneficiaries for autonomy and supporting them to become active members of Greek society. Secondly, it aims at creating an integration mechanism for beneficiaries of international protection, resulting in a rotation mechanism for the current Greek temporary housing system.

Target group: The target group of the HELIOS project consists of beneficiaries of international protection recognized after 01/01/2018.

Partners: Catholic Relief Services (CRS), Danish Refugee Council Greece (DRC Greece), Greek Council for Refugees (GCR), Solidarity Now , INTERSOS , Municipality Development Agency Thessaloniki S . A (MDAAT), Metadrası , PLOIGOS , Public Benefit Enterprise of the Municipality of Levades (KEDIL), Technology and Human Resources Institute (IATAP)

Areas of implementation: The project is implemented throughout Greece.

<https://greece.iom.int/el>

In fulfilment of the above Ministerial Decision of the Ministry of Immigration Policy and according to the Greek Council for Refugees, a total of 204 recognized refugees, who had received protection 20 months ago and were hosted under the ESTIA programme, were ordered to leave the apartments where they lived until the end of March 2019⁶¹. According to the Ministry of Immigration Policy, beneficiaries of

⁶¹ About AIDA see Country Report: Greece, March 2019 Update, available in English: <https://www.asylumineurope.org/reports/country/greece>. Last accessed 27-5-2020. Also see the Decision of the Ministry of Immigration Policy no. 6382/2019 of 12 March 2019, "Determination of the framework for the implementation of the program of financial assistance and housing ESTIA", Government Gazette 853 / B / 12.03.2019.

international protection who would leave the ESTIA programme would continue receiving cash assistance for another 3 months. At the same time, they would be given priority in joining the vocational training programme soon to be implemented in cooperation with the Ministry of Labour.

This move by the State was particularly worrying and the GCR had stressed that the process of leaving the structures of ESTIA should be closely monitored to avoid pushing people into homelessness given the obstacles faced by beneficiaries of international protection in accessing the labour market combined with the weak social welfare system and the fact that additional actions under the "HELIOS 2" programme would begin after June 2019 and they only cover 5,000 beneficiaries.

As a response, the organizations Pro Asylum and Refugee Support Aegean have registered the homeless beneficiaries of international protection or those of them living in miserable conditions in makeshift structures in Athens without access to electricity or water. An example is a vulnerable family of four refugees who returned from Switzerland at the end of August 2018. Upon their return to Greece, the family ended up homeless, deprived of significant benefits and both parents unable to find work. According to the organizations' findings, "*[in] practice, refugees do not yet have safe and effective access to housing, food, medical and psychological care or the labour market. The international protection regime in Greece cannot guarantee a dignified life for the beneficiaries and it is nothing but a protection that exists only on "papers"*⁶²".

E) Family Reunification

The Presidential Decree (P.D.) 131/2006 "harmonization of Greek law with Council Directive 2003/86 / EC on the right to family reunification" (Government Gazette A

⁶²Refugee Support Aegean (RSA) and PRO ASYL: Returned recognized refugees face only deadlocks in Greece, 2019, available here: https://rsaegean.org/el/epistrefomenoi_anagorismenoi_prosfyges_sthn_ellada/. Last accessed 27-5-2020.

'143 / 13.7.2006) as amended by P.D. 167/2008 (Government Gazette A '223 / 4-11-2008)) and P.D. 113/2013 (Government Gazette A '146)", remained applicable during the evaluation period for family reunification. However, this text is limited exclusively to the family reunification of recognized refugees (Article 139 par. 3 4251/2014). Thus, the beneficiaries of subsidiary protection are not entitled to family reunification, as the P.D. 131/2006 explicitly refers to refugees. On the other hand, Law 4251/2014 also excludes from the provisions of family reunification the beneficiaries of subsidiary protection as defined by the Council Directive 2003/86 / EC (Article 69 par. 2c Law 4251/2014).

Article 13 (Article 10 of Directive 2003/86 / E C) PD 131/2006, provides for a broader definition of family members of refugees than for those of third-country nationals entitled to family reunification. In addition to spouses and minor children, refugees can apply for family reunification are a) with adult (unmarried) children who are unable to support themselves due to health problems, b) with parents with whom they lived before their arrival in Greece and who depend on them and c) their partners with whom they maintain a long-term relationship (Article 13 par. 1 PD 131/2006). If the refugee is also an unaccompanied minor, then family reunification will be allowed with a) his first-degree blood relatives and with b) the legal guardian or another member of his family, if the minor has no blood relatives or they cannot be identified (Article 13 par.2 PD 131/2006).

Furthermore, it is noted that family reunification is a fragmented process and when an application is submitted within 3 months from the recognition of refugee status, this does not include the obligation to submit additional documents other than those proving family ties and the identity of family members. Thereby, outside this time period documents must be submitted by the applicant based on the conditions of article 14 of the PD. 131/2006 (article 5 par. 4, 11/12 Directive 2003/86 / EC):

- *Minimum Income Term: '[...] (ii) tax authority statement or any other public document proving that he has a stable and regular annual personal income sufficient for the needs of himself and his family, which does not come from the social assistance system of the country. This income may not be less than the*

annual salary of the unskilled worker, increased by 20% for the wife and by 15% for each parent and child [...] ».

- *Housing condition:* a document is required for the purchase / rental of a house as proof (14 par. 1, d iii., PD 131/2006 as amended). The above provisions on housing always apply in case of family reunification with the refugee's parents.
- *Condition for insurance and social security:* it is required to submit "[...] (i) a certificate from a public social security institution proving that the refugee has full health insurance in respect of all the risks provided for the respective categories of domestic workers , which also covers his family members who will be supported by him. » (14 par. 1, d. PD 131/2006 as amended).

A significant development during the examination period for family reunification was observed in August 2018 when the long-awaited JM 47094/2018 was issued⁶³, which sets out the required supporting documents and the procedure for issuing a national entry visa in the context of their family reunification with refugees. In addition to this, this JMC introduces for the first time instructions for conducting DNA tests with relatives in order to establish the family connection with the applicant refugee as well as for conducting interviews with family members. The Ministry of Foreign Affairs has also published a relevant information leaflet on its website⁶⁴.

According to the GCR⁶⁵, from the issuance of the decision above, the visa applications after a positive family reunification decision submitted to the Greek Consulates, were as follows:

- In Beirut, Lebanon, 16 visa applications were submitted following a positive decision on family reunification applications. Of these, 11 cases are monitored. Based on these 11 cases, 14 have been issued visas for family reunification of

⁶³ Government Gazette B '3678 / 28-08-2018.

⁶⁴ See Ministry of Foreign Affairs: <https://www.mfa.gr/en/visas/visa-types/national-visas.html>. Last accessed 27-5-2020.

⁶⁵ About AIDA see Country Report: Greece, March 2019 Update, available in English: <https://www.asylumineurope.org/reports/country/greece>. Last accessed 27-5-2020.

refugees (H .3 category visas). 4 visas are pending, after an interview conducted by the Embassy in 2018. In one case, the receipt of a criminal record is pending. With regard to the remaining five cases, it was not possible to contact with applicants.

- In Jeddah, Saudi Arabia, a family reunification visa has been issued for a recognized Syrian refugee. The visa application was submitted on December 3, 2018 and the visa was issued on December 10, 2018.
- In Cairo, Egypt there are 3 pending applications for family reunification visa. Two of them refer to Palestinian refugees and the delays are due to the difficulty of members residing in Palestine to travel to Cairo in order to complete the process in person. The other pending application refers to a recognized refugee from Sudan.

Finally, it should be noted that refugees applying for family reunification face serious obstacles that make it virtually impossible to exercise the right to family reunification effectively. Lengthy procedures, administrative obstacles in issuing visas even in cases where the application for family reunification has been accepted, the requirement to present documents that are difficult to obtain from the refugees and the lack of information about the possibility of family reunification, a period of three months which differentiates the necessary supporting documents to be submitted and the available legal remedies represent major⁶⁶ obstacles for the exercise of this right⁶⁶.

In addition, the Council of Europe Commissioner for Human Rights notes that these administrative barriers meant that only a small number of beneficiaries of international protection can actually initiate a family reunification process. Furthermore, deficiencies in the family reunification process sometimes lead families

⁶⁶ See on Refugee Support Aegean (RSA) and PRO ASYL, Returned recognized refugees face only deadlocks in Greece, 2019, available here: https://rsaegean.org/en/epistrefomenoi_anagnorismenoi_prosfyges_sthn_ellada/. Last accessed 27-5-2020.

to seek other methods of reunification mainly through dangerous and irregular routes⁶⁷.

In 2018, 346 applications for family reunification were submitted to the Asylum Service. The Asylum Service issued 19 positive decisions, 6 partially positive and 16 negative⁶⁸. Respectively, 10 applications for family reunification were submitted in 2018 before the Attica Aliens Police Division by applicants who were recognized as refugees under the "old" regime of international protection. Of these, only 2 applications were accepted.

⁶⁷ Council of Europe Commissioner for Human Rights. Report of the Commissioner for Human Rights of the Council of Europe Dunja Mijatović following her visit to Greece from the 25th to 29th of June 2018, CommDH (2018) 24, 6 November 2018, paras 68-69.

⁶⁸ About AIDA see Country Report: Greece, March 2019 Update, available in English: <https://www.asylumineurope.org/reports/country/greece>. Last accessed 27-5-2020.

Instead of an epilogue: What lies ahead?

1. About the comparative study

The first benchmark and evaluation phase showed a wide range of gaps and discrepancies in data availability between the countries under evaluation. Specifically, this lack of data exists with regard to public expenditure for the integration of refugees, staff resources and the detailed statistics that will give us information about beneficiaries of international protection in relation to other immigrant groups. Data collection systems are fragmented and policy effectiveness assessments are absent, the same for monitoring the progress of integration programs and funding.

A cohesive European framework for a cooperative response to the challenges of refugee integration, is far from being a reality despite the countries' efforts to implement legal and policy initiatives to generate a more cohesive European framework. This is due to the big differences between the countries identified in the comparative report. Beneficiaries of international protection are not given the same fair and reasonable opportunity to integrate across the EU. Simply put, people who are granted international protection in one country may face better conditions for employment support but poor housing and children's education whereas in another it could be the opposite. The cohesiveness of the different integration sectors might notably differ even within the same country. Furthermore, in some countries beneficiaries of international protection may suffer from the almost complete absence of integration policies in some of the sectors.

Given these incomplete and poor integration policies across the EU, countries are creating - intentionally or unintentionally - unequal opportunities for beneficiaries of international protection to achieve a better life in Europe. Social cohesion in countries with incomplete integration policies may be in danger because beneficiaries might be on the verge of marginalization and impoverishment that can as well turn into inactivity and resignation rather than providing the instruments to empower the beneficiaries to fight for a better future. Every European debate on the responsibility for sharing of responsibility in the asylum field should consider the vast differences in

the policy initiatives to support the integration of beneficiaries of international protection across the EU: Differences in integration policies that turn into a different treatment of the beneficiaries which translate into unequal opportunities for beneficiaries across the Member States.

Diverse immigration experiences and countries' asylum histories solely do not explain the differences in integration policies. Especially when having a closer look results do not show significant discrepancies between countries with similar refugee reception histories or between countries in similar geographical location and recent movements. Therefore, among the countries of Northern and Western Europe that have a long tradition of receiving refugees, Sweden generally offers more favourable conditions than France and the Netherlands. Among the countries of Southern Europe, Greece stands out as the least favourable framework. In the countries of Eastern-Central Europe, the worst position is taken by Hungary. In other words, the historic structural conditions defined by geographical location and exposure to refugee and migration flows or the institutional and legal history of each country matter but still are not decisive for the quality of the existing integration framework. Differences between the countries with similar backgrounds are explained by the political choices of the respective governments.

2. About Greece

In the previous National Report of Greece within the NIEM programme, some conclusions were presented on issues that needed to be regulated and resolved. These issues continue to exist in the second evaluation phase. These are the following:

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 EKKA 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 EKKA 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:

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, have to 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 continues 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 protection⁶⁹. 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

⁶⁹ See GNCHR: Observations on the Draft Law of the Ministry of Civil Protection "On International Protection: provisions for the recognition and status of third-country nationals or stateless persons as beneficiaries of international protection, for a single status for refugees or for persons entitled to subsidiary protection and for the content of the protection provided, consolidation of provisions for the reception of applicants for international protection, the procedure for granting and revoking international protection status, restructuring of judicial protection of asylum seekers and other provisions". October 2019. http://www.nchr.gr/images/pdf/apofaseis/prosfuges_metanastes/Paratiriseis%20EEDA%20sto%20nomosxedio%20gia%20Asylo%2024.10.2019.pdf. Last accessed 27-5-2020; See as well Greek Council for Refugees, Press Release for the "On International Protection", 22-10-2019, <https://www.gcr.gr/el/news/press-releases-announcements/item/1285-deltio-typou-gia-to-nomosxedio-peri-diethnoys-prostasias>. Last accessed 27-5-2020; See Amnesty International. The proposed draft law on Asylum degrades the protection and rights of refugees and violates European and International legal standards, 24-10-2019. <https://www.amnesty.gr/news/press/article/22623/proteinomeno-shedio-nomoy-gia-asylo-ypovathmizei-tin-prostasia-kai-ta>. Last accessed 27-5-2020.

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.

SPECIAL ANNEX ON DEVELOPMENTS CONCERNING REFUGEES IN VIEW COVID -19

During the implementation of measures to prevent the spread of the coronavirus Covid -19, the organizations European Migration Policy Group and Institute of Public Affairs in collaboration with ANTIGONE undertook the preparation and publication of short information texts on the website of the NIEM program on its impact pandemic situation of refugees and asylum seekers in Greece.

The following table contains the texts.

25.4.2020

COVID -19 in Greece: How the government manages access to asylum in time of pandemic
[<http://www.forintegration.eu/pl/covid-19-in-greece-how-the-government-manages-access-to-asylum-in-time-of-pandemic>]

In response to the Corona virus COVID-19 the Greek government through acts of legislative content and ministerial acts has gradually provided restrictions since the end of February 2020.

One of the first measures was the shutdown of the Greek-Turkish borders. Invoking the article 78 of the Treaty on the Functioning of the European Union (TFEU), which provides for the adoption of provisional measures in emergency migratory situations at external borders, Greece announced the suspension of all asylum applications. The government's decree was introduced on March 2nd and, approved by the Parliament, the regulation entered into force on March 26th (L. 4681/2020). No asylum requests were registered, and people receive no assistance. The measure was supposed to last a month and had to be lifted on 1st April, however due to the outbreak the Asylum Service has suspended its operation. Asylum seekers are detained and taken immediately to reception centres, which are severely over-crowded. Aiming to restrain contamination the Greek authorities are imposing a 14-day quarantine on all newly arrived asylum seekers on Lesbos. This led to more than 150 asylum seekers being abandoned on the island's northern shore during March and the beginning of April. Even though the 14-day period has since passed, they have yet to be registered, they have received no information about their status, no access to crucial medical services, and they are sleeping on the beach. Among the new arrivals are two babies, two unaccompanied children, a man with a physical disability and a woman suffering from rheumatic disease.

According to the Oxfam till the end of March, the Greek authorities have blocked at least 2,500 people from seeking asylum in the EU.

Following the governmental decision, the nationwide lockdown has been extended till the 4th of May. There is no information on deportations however NGOs have reported push-backs and returns of those found entering the Greek borders. The government has extended restrictions on the movement of refugees and migrants living in camps or accommodation centres throughout the country until May 10.

To facilitate access of asylum seekers and immigrants to medical assistance Greece issued temporary healthcare numbers - Temporary Number of Insurance and Healthcare for Foreigners, ΠΑΑΥΡΑ/ΠΑΑΥΠΑ, which grants them access to the public healthcare system. The numbers are issued automatically together with their asylum seeker's card by the Asylum Service.

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ANTIGONE - Information and Documentation Center on Racism, Ecology, Peace and Non-Violence

Kseniya Homel

The European and Migration Policy Programme
Institute of Public Affairs

Resources:

Greece Suspends Acceptance of New Asylum Applications, <https://greece.greekreporter.com/2020/03/02/greece-suspends-acceptance-of-new-asylum-applications/>, [02.03.2020].

Temporary Number of Insurance and Healthcare for Foreigners (ΠΑΑΥΡΑ/ΠΑΑΥΠΑ), <https://cheering.eu/2020/04/02/temporary-number-of-insurance-and-healthcare-for-foreigners-paaypa-%CF%80%CE%B1%CE%B1%CF%85%CF%80%CE%B1/>, [02.04.2020].

OXFAM & GCR briefing for Lesbos amidst the coronavirus, <https://www.gcr.gr/en/news/press-releases-announcements/item/1420-oxfam-gcr-briefing-for-lesvos-amidst-the-coronavirus>

25.4.2020

COVID -19 Outbreaks in Greek Refugee Camps

[<http://www.forintegration.eu/pl/covid-19-outbreaks-in-greek-refugee-camps>]

NGOs raise concerns about the dramatic sanitation condition in overcrowded migrants camps on five Greek islands in the Aegean Sea. Currently more than 34,875 migrants, refugees and asylum seekers stay in camps on islands of Chios, Kos, Leros, Lesbos, and Samos.

According to the UN Refugee Agency (UNHCR), around 36 per cent of residents are minors. Facing the lack of basic hygienic facilities residents cannot maintain social distancing, follow the guidelines and advices issued by health authorities to protect from COVID-19 and prevent themselves from the contagion. Already there have been three cases of lockdown of refugee and migrant facilities. Two migrant camps, in Malakasa and Ritsona, and a migrant hostel managed by IOM in the town of Kranidi were put under quarantine, as some residents were tested positive for the virus.

Although no case has been reported at the reception centre in Moria, Europe's biggest camp for displaced people, the UNHCR is cooperating with the Hellenic National Public Health Organization (EODY) and other medical actors to establish medical units and spaces for screening and quarantine in the vicinity of the reception centre in Moria. On April 24th, the UNHCR, moved 122 elderly and immune-suppressed asylum seekers out of Moria to rented hotels on Lesbos island.

Transfers to the mainland

In aim to prevent the outbreak of the coronavirus inside camps, the Greek Government in cooperation with the European Commission announced the plan to transfer most

vulnerable residents, such as people with health problems, disabilities, women and children, to empty hotels and other camps in the mainland. The Government planned to transfer 1,500 migrants from the islands on Saturday 25th April 2020 but this was postponed. The relocation decision evoked also demonstrations in and around the Moria camp. As Infomigrants present, desperate over the conditions and the slow processing, the protesters demanded transportation to the Greek mainland and said that they are risking their lives due to the spread of the virus.

During the month of April a few fires have torn through migrant camps on the Greek island of Samos and in the migrant camp on Chios. As the Greek migration ministry secretary Manos Logothetis said, the fire in the Vial refugee camp on Chios island destroyed the facilities of the European asylum service, a canteen, warehouse tents and many housing containers. The fire erupted after a 47-year-old asylum seeker from Iraq died in the camp. A woman was hospitalised with a fever to the hospital but was tested negative for coronavirus.

Two fires in Samos broke out on 26 and 27th April, and according to the officials, were caused by the conflict among migrants. The camp is massively overcrowded, with nearly 7,000 people in a facility built to handle fewer than 650. Because of the fire, over 200 migrants and refugees have been left homeless.

Relocation of unaccompanied minors

More than 5,000 unaccompanied minors currently live in the overcrowded camps on the Greek islands. Around 10% of them are under 14-years-old, according to police agency Europol. On March 13 the European Commission stated that the group of Member States have agreed to evacuate 1,600 unaccompanied asylum-seeking children. Ten European countries have offered to host more than 900 children. Germany and Luxembourg, France, Portugal, Ireland, Finland, Croatia, Lithuania, Belgium and Bulgaria also said they were prepared to take in children from the Greek camps.

Only 59 unaccompanied underage refugees, out of 1,600 declared, have been recently transferred to two EU member states. The first relocations to Luxembourg took place 15th April. 12 unaccompanied asylum-seeking children, one girl and 11 boys, two of them Syrian and ten Afghans aged 11 to 15, have been living in overcrowded reception and identification centres for several months on the islands of Lesbos, Samos and Chios. Germany welcomed a group of 47 children on April 18. According to the Deutsche Presse-Agentur (DPA) the majority of the relocated minors with an average age of 13 come from Afghanistan, Syria and Eritrea. There were 4 girls in the group. All the unaccompanied minors undergo a 14-day quarantine.

Lithuania has offered to host two minors but as the spokeswoman for the Lithuanian Interior Ministry stated on April 15, the country has postponed the transfer till the end of coronavirus quarantine.

As further relocations of minors seem to be frozen because of the Covid pandemic, thousands of children remain to be trapped in overcrowded, unsanitary and deplorable conditions. Ten European cities call for immediate solidarity action and offered a home to vulnerable children.

The European Network of Ombudspersons for Children (ENOC) addressed a letter to the European States and Institutions urging for the immediate evacuation of migrant children from the refugee camps on the Greek islands.

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Relocations of unaccompanied children to EU+: contribution of states, cities and civic society

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Since 2015, almost 1,400 unaccompanied children have been transferred from Greece to another EU+ state in aim to address overcrowding in reception centres. But still the situation requires urgent solidarity solutions. Numbers of children seeing shelter in Greece are only on the rise.

The outbreak of COVID-19 made the situation more critical, threatening health and lives of children locked down in harsh conditions with no sanitation, facing a risk of contamination, deprived from sufficient medical and psychological assistance. More than 5,000 unaccompanied minors remain in camps, with almost 1500-1800 trapped in hotspots on six Greek Aegean islands. In February 1000 unaccompanied children were living in and around the Moria Camp on the island of Lesbos.

Contribution of states

In March the European Commission introduced an Action Plan for immediate measures to support Greece. Following the urgent need of solidarity action, 10 Member States announced the joint initiative, declaring to evacuate 1,600 unaccompanied asylum-seeking children. Belgium, Bulgaria, France, Croatia, Finland, Germany, Ireland, Portugal, Luxembourg, Lithuania and Switzerland have offered to host relocated children on their territories. Only three transfers have taken place under the initiative. In April two groups of 12 and 55 children were transferred to Luxembourg and Germany sufficiently. At the beginning of May, Portugal announced that it would take up to 60 unaccompanied children from Greek refugee camps. In May a group of 23 minors found their homes in Switzerland. Although the United Kingdom did not join the initiative, it welcomed the group of 16 unaccompanied asylum-seeking children.

Some relocations were postponed due to the high risk of the covid outbreak. Lithuania announced to host two minor migrants as soon as anti-covid restrictions will be lifted in the country. France is willing to take 350 unaccompanied minors in July.

Despite the efforts and contributions of some national governments the issue of relocations of unaccompanied minors remain to be marginalized. 16 EU countries have not agreed to relocation yet. Although thousands of children are in urgent need of durable solutions, quotas of transferred groups are inadequate to the scale of the problem.

Cities and civic society are leading the way

Cities, churches and citizen groups are active in calling on their national governments for immediate response. In April 67 civil society organisations directed an open letter to European governments urging states to honour their pledges and proceed with emergency relocations from the Reception and Identification Centres (RICs) on the Greek islands.

European cities lunched joint initiatives to advocate for solidarity and to speed up immediate relocations. Over 40 cities and towns have joined the initiative #CitiesMustAct to convince governments and EU leaders for immediate actions. The initiative started in March when the Mayor and citizens of Berlin stated the willingness to welcome 1,500 refugees from camps on the Greek mainland and islands.

The mayors of Cologne, Düsseldorf, Potsdam, Hanover, Freiburg, Rottenburg and Frankfurt (Oder), together with the Interior Minister of Lower Saxony, signed an appeal to federal government to fulfil national commitments. The Dutch city of Leiden also pledged its involvement in any such scheme developed for The Netherlands.

Other examples of solidarity come also from regions. Thuringia, German federal state, announced that it will launch an admission programme and grant residence permits to 500 asylum seekers from Greece by the end of 2022.

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