

Member State Reply on the 2024 AIDA country report on Greece

A. Reply by the General Secretariat for Vulnerable Persons and Institutional Protection

1. Statistics

Reference to statistics extracted from the country report	Page and section	Comments, corrections, or additional statistical information and updates
385 unaccompanied migrant children were detained in PRDCs throughout 2024. This does not include unaccompanied children detained as adults, including during age assessment procedures in spite of the presumption of minority	Page: 24. Section: Detention of Vulnerable Asylum Seekers	No source is provided for this number in the text at this point. Moreover, it does not concur with the statistics that are extracted from the database of the National Emergency Response Mechanism (NERM), according to which NERM has received a total of 195 UAM referrals from PRDCs in 2024. This number includes UAM, who were initially detained as adults and were subsequently registered as minors, following age assessment. It is to be noted that following the abolition of the measure of protective custody by law in 2020 and since the establishment of NERM in 2021, UAM who are traced by the police are not detained and are referred to NERM for emergency accommodation. Moreover, the Police Headquarters regularly inform NERM for the presence of UAM in PRDCs or police departments and NERM follows-up the cases for placement to emergency accommodation.

2. Asylum Procedure

Extract from the country report	Page and section	Comments
Similarly, the Leros “SAFE Zone” had reached three times the sections’ nominal capacity by the end of November 2024, with the people living under deplorable conditions and constant police interventions in the “SAFE Zone” section.	p. 64	During 2024 the safe area’s occupancy never reached 3 times its nominal capacity, rather than 2 times.
Under the new legislative provisions, general competency was transferred from the National Centre for Social Solidarity of the Ministry of Labour and Social Affairs to the Special Secretary for the Protection of Unaccompanied Minors (SSPUAM) to the General Secretariat for Vulnerable	p. 93	A phrase is missing between the SSPUAM and the GSVPIP. Suggestion to add “being succeeded in 2023 by the” or something similar.

Persons and Institutional Protection.		
Under the new law, the provision of guardianship is relegated to a list of legal entities appointed by the Public Prosecutor (<i>i.e.</i> , public entities, NGOs, international organisations) who collaborate with persons acting as guardians.	p. 93	The legal entities must employ the professionals acting as guardians (guardianship mandated persons), not just “collaborate with persons”. Suggestion to substitute “collaborate with” with the word “employ”.
Under the new law, the provision of guardianship is delegated to a list of legal entities appointed by the Public Prosecutor (<i>i.e.</i> , public entities, NGOs, international organisations) who collaborate with persons acting as guardianship-mandated persons (henceforth referred to as “mandated guardians”).	p. 148	See above. Suggestion to amend as following “that employ persons acting [...]”
The total number of mandated guardians for UASC throughout the country on 22 January 2025 stood at 128, significantly below the expected minimum number of 170 (with a project that provisioned a maximum of 180 mandated guardians).	p. 148, Section: Legal Representation of Unaccompanied Children.	Indeed, this number is accurate for that time. Yet it should be noted though that the average number of guardians for 2024 was 127, due to gradual implementation of the guardianship project, which included recruitments in three stages (60 guardians by the end of the first month, 120 by the end of the first trimester, 170 by the end of May 2024). Since May 2024, until August 2025, the average number of guardians is 142 (reaching at a point 168 guardians, in June 2024).
At the time of writing, UAMs’ presence in Safe Areas or Zones inside RICs, both on the mainland and the islands, is much higher than the number of those registered (and thus recorded in the cited statistics), and exceeds the actual capacity of these arrangements	p. 149	With regard to this discrepancy, we would like to note that up to now the dashboard of statistics for UAMs (e.g. https://migration.gov.gr/wp-content/uploads/2025/09/SGVP_Statistics-September_GR.pdf) is based on the data retrieved from the accommodation requests submitted before the competent authority, as well as the accommodation arrangements updates. This is the case since 2017 and on.
Consequently, discrepancies have been observed concerning the level of involvement of guardians, lawyers, social workers and educators, some of which have affected UACS’ asylum procedure, such as Dublin II procedures and appeals, as lawyers and other professionals now require authorisations from the	p. 149	It should be noted that in alignment with other EU member states’ good practices and to EU legislation, the guardian is responsible for representing the minor in asylum and family reunification procedures. The fact that the role of the guardian of unaccompanied children was introduced in Greek practice after two decades of working together with unaccompanied children can only mean that it will take time for this role to be embedded and embraced.

mandated guardian to support or follow up on a case.		
The National Emergency Response Mechanism (NERM), which in accordance with L. 4939/2022, is part of the General Secretariat for Vulnerable Persons and Institutional Protection, and includes a 24/7 telephone hotline	p. 150	The “15107” Tracing hotline of NERM is available Mo-Fri: 08:00-22:00 and Sat: 11:00-19:00

3. Reception Conditions

Extract from the country report	Page and section	Comments
General Secretariat for Vulnerable Persons and Institutional Protection (GSVP)	p. 151	Correct abbreviation is GSVPIP
There is no capacity to actually screen vulnerabilities or provide them with the health care they need. Unaccompanied and separated children face additional barriers when they reach the CCAC. Until a guardian is appointed, these children have no one to provide them with clothes, shoes or a cell phone to call home and talk to their family. Unaccompanied children also have to spend about two to three weeks in a fenced area called a ‘safe area’ until they are transferred to a shelter for unaccompanied children. There is nothing to do in the safe area, no activities, recreational or otherwise. It is a container surrounded by barbed wire.	p. 195, section: Conditions on the Eastern Aegean islands	Clothes, shoes and communication are provided by the child protection actor operating in the safe area, complementing any distributions made by RIS. Activities are provided by the staff of the child protection actor as well.
The newly established General Secretariat is also competent for the National Referral Mechanism, according to Article 66ΑΓ of L. 4939/2022 added with Article 39 of L. 4960/2022.	p. 210, section: Special reception needs for vulnerable groups	The correct name of the GSVPIP’s Mechanism is “National Emergency Response Mechanism”, whereas the one included in that sections is something different.
The goals of NERM can be separated into the categories: a) accommodation and relocation management, b) evaluation of hosting facilities, c) social	p. 210	Please be aware that these are the goals and mandate of the General Secretariat for Vulnerable Persons and Institutional Protection and not of NERM. The goal of NERM is to identify promptly children in immediate need of protection and shelter, transfer

integration support, d) institutional protection		them to appropriate accommodation and provide them with the necessary services.
Based on updates by EKKA, by the year's end, the majority of referrals were for UAMs from Egypt (48%), Somalia (15%), Syria (14%) and Afghanistan (10%).	p. 211	By the end of 2022, EKKA had stopped being involved in any capacity in the generation of statistics. Therefore, the phrase should be corrected to "Based on updates by MoMA, by the year's end, [...]"
In December 2024, the average waiting period for the placement of unaccompanied minors residing in island RICs to suitable accommodation places for UAMs was 8,88 days. Lastly, the average time for the placement of UAM in a shelter was 13.45 days.	p. 211	We recommend deleting these two sentences because the data that we had provided you did not concern only islands (for example even the placement from emergency to long-term is included and even the placement from the streets to emergency is included), and moreover it concerned the time period between the issuance of an accommodation act until the actual placement of a child. Given that currently we don't have the capacity to retrieve the requested data (e.g. from the day a child entering the safe area in island CCAC until the moment he/she is placed in an accommodation center), perhaps is better to omit it this information.

3. Detention of Asylum Seekers

Extract from the country report	Page and section	Comments
A number of 385 unaccompanied children have been detained in PRDCs during 2024, prior to their placement in a shelter for UAMs.	p. 216 Detention of Asylum Seekers	See above comment under statistics: 195 UAMs
In total, 385 unaccompanied children were kept in PRDCs countrywide during 2024. ^[1] [1] Information provided by the Directorate of the Hellenic Police, 18 January 2024.	p. 222	See above comment under statistics: 195 UAMs. The reference includes the date of 18 January 2024, while the number in question should be corresponding to the entire year of 2024.
However, the scope of the JMD 9889/2020 does not apply to age assessments of unaccompanied children under the responsibility of the Hellenic Police, <i>i.e.</i> , minor children arrested by the police. In practice, children under the responsibility of police authorities are as a rule deprived of any age assessment guarantees	p. 222	The JMD can be applied also for children under the responsibility of the Hellenic Police, as long as their asylum seekers and their have been processed for migration status issues (not penal). RIS is responsible for coordinating the procedure. There is always the right to submit an appeal against the decision of the age assessment.

<p>set out in the Ministerial Decision, and systematically undergo medical examinations consisting of left-hand X-ray, panoramic dental X-ray and dental examination if their age is disputed. In addition to the limited reliability and highly invasive nature of the method used, no remedy exists to challenge the outcome of that procedure.</p>		
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4. Content of International Protection

5. Additional remarks

B. Reply by the Reception and Identification Service

1. Statistics

2. Asylum Procedure

Reference to statistics extracted from the country report	Page and section	Comments, corrections, or additional statistical information and updates
<p>In Kos, the residents of the CCAC have very limited access to basic supplies and good quality food, while the accommodation areas are in very poor condition, partially damaged and in need of maintenance. Living conditions in the CCAC further deteriorate in times of mass arrivals due to lack of adequate spaces to accommodate people, newly arrived individuals are placed in common spaces (<i>i.e.</i>, restaurants, classrooms), without beds, mattresses, blankets, etc. Part of the PRDC in Kos is also used as accommodation area. Issues related to restricted freedom of movement even between the different sections of the CCAC persist. As a result, the access of the residents to sections where the offices of the administration are based is hindered.^[1]</p> <p>[1] GCR, <i>Absolutely inadequate conditions in the new Closed</i></p>	<p>Section Asylum Procedure, B, 2, 2.1, p.58</p>	<p>Throughout the reporting period, CCAC Kos, in close coordination with the Regional Services of RIS, came under substantial pressure due to intensified migratory flows and the overcrowding that followed. To address the immediate needs arising from this situation, additional premises — including communal areas — were temporarily utilized alongside the designated accommodation facilities.</p> <p>Despite the continuous increase in arrivals, the Administration of CCAC Kos ensured that reception and identification procedures for all TCNs were initiated without delay. Priority was given to the provision of appropriate accommodation, with particular care for vulnerable individuals such as unaccompanied minors and single-parent families. Simultaneously, any infrastructure damage was swiftly reported to the competent Technical Service, which was promptly mobilized to carry out necessary repairs.</p> <p>The creation of distinct sections within CCAC Kos primarily serves the protection of vulnerable groups, ensuring their safety and dignity by separating them from the general population. It should also be highlighted that restrictions on freedom of movement apply</p>

<p><i>Controlled Access Center (CCAC) of Kos: The European Court of Human Rights has granted Interim Measures</i>, 14 December 2023, available at: https://tinyurl.com/mr36kzwr and Civil Society Joint Statement, <i>Not again in 2024: Call for upholding human rights in the Samos Closed Controlled Access Centre</i>, 31 January 2024, available at: https://bit.ly/3vKHJje, RSA, “Refugee facilities on the Aegean islands”, Kos, 10 December 2024, available here, GCR’s observations from the field.</p>		<p>strictly for the period required to complete reception and identification procedures, pursuant to Article 40 of Law 4939/2022 (Government Gazette A’ 111). Such restrictions may not exceed 25 days from the date of entry into the RIC/CCAC, after which applicants are granted freedom of movement, unless one of the exceptional situations foreseen under Article 50 of the same law applies.</p> <p>As for nutrition, a balanced and culturally appropriate diet is provided on a consistent basis, tailored to the dietary needs of all TCNs. Meal distribution takes place under hygienic conditions fully aligned with health and safety standards, while continuous access to safe drinking water is guaranteed. Special dietary provisions are also ensured for infants, young children, pregnant or lactating women, and individuals with specific medical requirements.</p>
<p>Furthermore, repeated reports by civil society organisations since the inauguration of CCACs to date, indicate prison-like conditions in the CCACs. [...] The Ministry of Asylum and Migration focuses on the 24/7 surveillance and security control mechanisms of the new centres, while the residents face practices of illegal <i>de facto</i> detention and arbitrary restrictions of personal liberty and freedom of movement and have limited access to healthcare.</p>	<p>Section Asylum Procedure, B, 2, 2.1, p.58</p>	<p>The security measures are primarily aimed at safeguarding the residents, in particular within the designated safe areas for families, single women, safe zones for unaccompanied minors, and vulnerable groups in general.</p> <p>Freedom of movement of the residents is restricted solely and exclusively for the purposes of completing the reception and identification procedures, on the legal basis of Article 40 of Law 4939/2022 (Government Gazette A’ 111), and for a maximum duration of 25 days from the date of entry into the RIC & CCAC. In all other respects, applicants are under a regime of free movement (subject only to the exceptional provisions of Article 50 of Law 4939/2022).</p> <p>It is specified that the CCACs apart from the RICs – by definition – also include the Pre-Removal Detention Centres (PROKEKA). Consequently, it is required to ensure the enforcement of restrictions for those third-country nationals until their departure from the country or the alteration of their legal status.</p>
<p>Although the Rule of Procedure of CCAC on the islands does not provide for a blanket prohibition of exit, the regime of <i>de facto</i> detention has been reintroduced in practice since the implementation of the CCAC in</p>	<p>Section Asylum Procedure, B, 2, 2.2, 2.2.1, p 63</p>	<p>As a rule, the Reception and Identification Service (RIS) ensures that registration procedures are carried out immediately upon arrival and in full compliance with the applicable national and European legal framework. However, in periods of sudden and unforeseen increases in arrivals, the</p>

<p>2021. According to the Asylum Code, this ‘restriction of liberty’ which amounts to <i>de facto</i> detention shall not exceed 25 days from the day of arrival in the RIC or CCAC, Also, the ‘restriction of liberty’ is provided in the Law by way of exception.²⁷⁰ However, upon arrival especially when the arrivals are increased and registration procedures are conducted with delay, newcomers might be placed under arbitrary restriction of liberty until their registration by the RIS is concluded. Until then, people are denied exit from the CCACs and certain cases they are restricted in the so-called ‘waiting areas’. Moreover, in few cases, newcomers remained under arbitrary restriction of their liberty for more than 25 days.</p>		<p>exceptionally high pressure on regional structures has required the activation of the flexibility foreseen by the Reception Directive.</p> <p>In such exceptional cases, the possibility of extending the registration timeframe has been applied, in order to allow the orderly and dignified management of the reception and identification procedures.</p> <p>To address such situations, the RIS implements immediate decongestion and management measures to maintain the continuity of registration while safeguarding the dignity of all applicants. Priority is given to vulnerable individuals, and geographical restrictions may be lifted to facilitate transfers to mainland facilities. Throughout the process, applicants are guaranteed dignified living conditions, family unity, access to emergency healthcare and psychosocial support, special provisions for vulnerable groups, clear information about their rights and obligations, legal assistance, and the opportunity to stay in contact with relatives and civil society organisations active in the fields of migration and human rights.</p> <p>It is important to note that any restriction on the freedom of movement of the residents is strictly limited to the duration required for the completion of the reception and identification procedures, in accordance with Article 40 of Law 4939/2022 (Government Gazette A’ 111). The maximum duration of such restriction does not exceed 25 days from the date of entry into the RIC/CCAC. Beyond this period, applicants are granted freedom of movement, except in the exceptional cases provided for under Article 50 of the same law.</p>
<p>Unaccompanied children, are prohibited from exiting the “SAFE Zone”, which is a fenced container section of the CCACs guarded by security personnel and where they are subject to “restriction of liberty” until their placement and transfer to shelters for minors. [...] However, by the end of 2024n the waiting time had alarmingly increased. As a result, the number of minors in the “SAFE Zones” of CCACs of Samos, Leros and Kos by far exceeded the actual capacity of the sites, further restricting the already limited access to essential services for children, such as medical care, legal aid and</p>	<p>Section Asylum Procedure, B, 2, 2.2, 2.2.1, p 64</p>	<p>The Reception and Identification Service makes every effort to ensure that procedures are completed within a short timeframe and always within the limits set by law. It should be noted that the Service also undertakes decongestion measures at locations facing population pressures, by referring individuals to facilities on the Greek mainland. Priority is given to vulnerable persons, with the aim of addressing their specific reception needs.</p> <p>Unaccompanied minors are also included in the reception and identification procedures. Upon their arrival, the relevant authorities (the Public Prosecutor’s Office and the General Secretariat for Vulnerable Persons and Institutional Protection) are promptly notified.</p>

<p>representation, education and often lack of essential clothing, blankets and bedding. [...] On 5 February 2025, the European Court of Human Rights (ECtHR) acknowledged the grave risks that children in CCACs face and granted interim measures in the case <i>O.A. and Others v. Greece</i> concerning four unaccompanied children in the CCAC of Samos. The ECtHR ordered the Greek authorities, among other actions, “to ensure their protection from ill-treatment, if necessary, by facilitating their lodging of criminal complaints,” as children report being subjected to police violence within the so-called “safe areas”, recognising that due to the extreme congestion and the absence of child-appropriate services, these children’s daily lives are marked by tension, insecurity, and fear.^[1]</p> <p>[1] ECtHR, <i>O.A. and Others v. Greece</i>, [Application no.2570/25]: available at: https://tinyurl.com/4juu77jz.</p>		<p>During their stay at the Center, unaccompanied minors are separated from adults and accommodated in a designated areas for their protection. In this area, they receive special treatment to fully safeguard their rights and best interests until their departure from the Center. These separate sectors provide security and supervision, while administrative and psychosocial support is ensured by specialized staff from the RIS or partner organizations cooperating with the Reception and Identification Service.</p> <p>Through referrals to the General Secretariat for Vulnerable Persons and Institutional Protection, the Service ensures that they are transferred as soon as possible to dedicated accommodation facilities for unaccompanied minors.</p> <p>Even during periods of high influx, the RICs/CCACs, within the framework of decongesting the Safe Areas in question , in full cooperation with the General Secretariat for Vulnerable Persons and Institutional Protection, ensured the immediate transfer of children to long-term care shelters.</p>
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3. Reception Conditions

Extract from the country report	Page and section	Comments
<p>Vulnerability identification: With the exception of checks, at the stage of registration, of indicators of trafficking in human beings, there was still no specific procedure introduced for the identification of vulnerable applicants or beneficiaries. In what concerns unaccompanied minors, the General Secretariat of Vulnerable Persons and Institutional Protection, along with the Public Prosecutor, are informed in detail and immediately after registration of separated, and in very rare cases, unaccompanied children, from Ukraine.</p>	<p>Overview of main changes since the previous report update, Temporary protection procedure, p. 25</p>	<p>The Reception and Identification Service (RIS) issued on September 2024 guidance to the staff that operates within RIS Facilities on how to identify and manage potential victims of human trafficking. This guidance refers to any person that resides in a RIS Facility, regardless of legal status.</p>
<p>In 2024, the EUAA delivered 204 training sessions to a total of 1,313 local staff members.</p>	<p>Asylum Procedure, Determining</p>	<p>This is not accurate. During 2024, the Greek Reception and Identification Service (RIS) in cooperation with</p>

	<p>authority, p. 28</p>	<p>EUAA organized the delivery of 66 thematic training sessions with 1,325 participants in total (including administrative and staff-related thematics, such as ‘Introduction to reception’, ‘Introduction to ethical and professional standards’, ‘Identification of potential Dublin Cases’, ‘Registration of applicants for international protection’, etc.; communication-related thematics, such as ‘Introduction to communication for asylum and reception’, ‘Communication and information provision’, etc.; and protection-related thematics, such as ‘Introduction to vulnerability’, ‘Children in the asylum process’, ‘Victims of Gender-Based Violence’, ‘Trafficking in human beings’, ‘Applicants with diverse SOGIESC’, etc.</p> <p>Furthermore, RIS collaborated with several other organizations on the design, organization and delivery of 58 training sessions, with 1,200 participants in total (including administrative-related thematics, in particular, a seminar for the procedure that is to be followed on the identification and management of potential Dublin case, organized in cooperation with the National Dublin Unit, and an introductory seminar to RIS, targeting all newly appointed staff designed, organized and delivered by RIS staff, as well as a number of protection-related thematics, such as ‘Trainings on Gender-Based Violence and abusive-violative behaviors’, ‘Seminar on the operation of Child Friendly Spaces’, ‘Together in sport’ training sessions with NGO METAdrasi, which covers unaccompanied children’s characteristics and types of child abuse including exploitation, ‘Child protection and Safeguarding of Children’, ‘Prevention of Sexual Exploitation and Abuse’, etc., organized in cooperation with other actors, including International Organizations - UNHCR, UNICEF, IOM; local agencies - the Research Center for Gender Equality, the General Secretariat for Equality and Human Rights, and the General Secretariat for Vulnerable Persons and Institutional Protection; and NGOs - METAdrasi, the Danish Refugee Council, Solidarity Now.</p> <p>Several of the trainings aimed at creating trainers for the respective sessions, so that RIS can sustainably and systematically provide training to its staff, esp. on ‘Prevention of Sexual Exploitation and Abuse’ and ‘Child protection and Safeguarding of Children’.</p>
<p>In addition to the fact that financial aid preserves refugees’ dignity and</p>	<p>Forms and levels of material</p>	<p>At the end of the extract please add: The current Cash Assistance Program came to an end on 31</p>

<p>facilitates the process of regaining an autonomous life, by allowing them to choose what they need most, the programme has also had a significant and positive impact on local communities, as this assistance is eventually injected into the local economy, family shops and service providers. In proportion to programme's beneficiaries, UNHCR estimated that approximately €7.4 million in cash assistance was expected to be injected into local economies in December 2020.^[1] No relevant data has been reported since the MoMA started issuing reports on the implementation of the financial aid programme.</p>	<p>reception conditions/ Situation in Practice/ Page 180</p>	<p>August 2025 with the completion of the payment for the reference month of March 2025.</p> <p>Throughout its implementation (October 2021 – March 2025), the program provided monthly financial support to asylum seekers residing in eligible accommodation schemes. The assistance ranged from €75 for a single person to €210 for families of four or more, with an additional amount (up to the same scale) granted to those without catered food provision.</p> <p>The program reached over 58,000 unique beneficiaries by its conclusion, offering crucial support for basic needs such as food, clothing, hygiene, communication, and local transportation.</p> <p>The program new form will be determined by the Ministry of Migration and Asylum (MoMA), as a new Joint Ministerial Decision is currently under consultation. This forthcoming decision will update the regulatory framework governing the provision of cash assistance. The revised program—including eligibility requirements and implementation modalities—will be communicated to all beneficiaries once finalised. Additionally, it has been proposed, and is under consideration, that the new scheme may have retroactive effect starting from April 2025.</p>
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<p>Based on the same survey, whose findings are corroborated by the UNHCR Inter agency Protection Monitoring Tool in Greece,[1] the main obstacle in finding employment for both applicants and beneficiaries of international protection was correlated with the lack of opportunities to skill up competences and learn Greek</p>	<p>Employment and education/ Access to the labour market/ Obstacles in practice/ Page 202</p>	<p>It is noted that as of April 2024, guidelines regarding access to employability were drafted and issued to the staff of the Regional Services. These guidelines include, among other provisions, the safeguarding of the right to housing for as long as individuals retain the status of applicant for international protection, either within the same Facility where they reside or in another, depending on their place of employment. They also outline measures aimed at facilitating access to the labor market for both asylum seekers and beneficiaries of international or subsidiary protection (e.g. dissemination of informational material, organization of targeted meetings with interested residents concerning the applicable legal framework on employment, their labor rights and obligations, as well as the provision of material reception conditions in the event of employment, etc.). Additionally, the Reception and Identification Service (RIS), in cooperation with other actors, including International Organizations and NGOs, has implemented several employment-related actions for asylum seekers residing in its Facilities, in particular in its Registration Centers (Reception and Identification Centers – RICs and Closed Controlled-Access Centers – CCACs) and its Accommodation Facilities (Controlled-Access Facilities for the Temporary Accommodation of Asylum Seekers – CAFTAAS). Indicatively, in 2024, more than 75 such activities (including job fairs, CV-making, informational sessions on the employment rights in Greece, Greek Lessons, preparation for job interviews, legal advice, improvement of digital skills, link with legal employments etc.) took place in 18 Facilities, with more than 4,500 Facility residents taking part.</p>
<p>However, shortcomings in the identification of vulnerabilities (see Identification), together with a critical lack of suitable reception places for vulnerable applicants on the islands (see Types of Accommodation) prevents vulnerable persons from enjoying special reception conditions</p>	<p>Special reception needs for vulnerable groups/ Page 209</p>	<p>Since October 2022, a dedicated mechanism has been established for the early identification and support of vulnerable persons, with designated focal points assigned to child protection, victims of GBV and human trafficking and general vulnerabilities. Case managers from the European Union Agency for Asylum (EUAA) carry out rapid assessments upon arrival in order to identify vulnerabilities and urgent cases, facilitating referrals to medical, psychosocial, or legal services, as appropriate. The appointed focal points are responsible for coordinating and monitoring all actions and referrals, thereby ensuring effective case management and guaranteed access to the necessary services. Where required, referrals are also made to specialized actors to ensure that individual reception needs are appropriately addressed. All</p>

		<p>cases are subject to regular follow-up by the case managers to ensure continued support and protection. Following the completion of the registration process and during the stay phase in RIS accommodation Facilities, asylum seekers continue to have access to medical doctors and psychosocial support staff (psychologists and social workers). It is up to the competent staff to decide whether they can provide treatment within the Facility or further refer the case to an appropriate public healthcare unit. The medical check-up is carried out with respect for human dignity and is necessarily accompanied by appropriate information to those undergoing it about the reasons for which it is carried out, as well as the treatment that will be followed, if necessary, in a language that the interested parties understand, taking into account their individual situation, including their age and gender.</p>
<p>Living conditions in mainland camps continued to be cause for concern throughout 2024 and into 2025, characterized by detention-like environments, critical gaps in essential services, and isolation due to their remote location</p>	<p>Overview of main changes since the previous report update Page 22</p>	<p>The living conditions in the CFTAAS have progressively improved, reflecting ongoing efforts to enhance both accommodation and the availability of services. As open-type facilities, they offer a broad spectrum of activities and services within the premises, including healthcare, psychosocial support, language and vocational training, non formal educational projects, as well as recreational activities. Their open nature ensures that residents can benefit from these services while maintaining access to the wider community, thereby strengthening both living standards and prospects for integration.</p>
<p>During 2022, there was obvious differential treatment by the State towards Ukrainian refugees and asylum applicants and refugees from all other countries; a welcoming policy that created a two-tiered reception system. Immediate access to the labour market and medical care, accommodation and food support; launch of an online pre-registration platform were all completed by the end of March 2022. For all other refugees and asylum applicants and also for Ukrainians who were in Greece before 26 November 2022 the situation has not ameliorated: difficulties in accessing the asylum procedure, problematic reception procedure and provisions of material conditions, and pushback practices remain. This distinction continued to apply in 2023 and 2024.</p>	<p>Differential treatment of specific nationalities in reception Page 213</p>	<p>Ukrainian refugees who have been granted temporary protection do not fall under the legal framework of reception conditions for asylum-seekers. Beneficiaries receive full rights under the EU Temporary Protection Directive, including access to work, healthcare, identification documents (including AMKA & AFM), and free interpreting services during registration. A self-registration platform is available for Ukrainians to book appointments at five regional Asylum Service offices (Athens, Alimos, Thessaloniki, Patras, Crete). Accommodation is provided in open structures, including long-term hosting in Elefsina and Serres and short-term hosting in Sintiki, with options for longer direct placement in accommodation centres.</p> <p>For the submission to the reception and identification procedures of third-country nationals and stateless persons residing irregularly within the Greek territory, the Ministry of Migration and Asylum has established an electronic platform for the submission of requests</p>

		<p>for initial registration. The operation of the platform is continuous. However, at times, due to the mass migratory flows at RIC & CAFTAAS Malakasa and Diavata, there have been periods of temporary inability to process requests. Nevertheless, third-country nationals and stateless persons (and in particular those belonging to vulnerable groups and the homeless) retained the possibility of sending email messages to the Reception and Identification Service, for their cases to be prioritised within the framework of the relevant procedures, a process which is extensively applied in practice.</p>
<p>Lastly, a new, severely worrying practice identified in early 2024 in the Samos CCAC, where amidst increased arrivals, people have been residing in deplorable conditions, raises further questions as to applicants' effective access to reception conditions. Namely, as observed in February 2024,[1] applicants are asked whether they would like to sign a solemn declaration stating that they do not wish to reside in the Samos CCAC or any other regional facility of the RIS, which in practice, seems to amount to being called to choose between prolonging their stay in a facility that utterly fails to meet reception standards, or renouncing their right to reception conditions, in order to be able to escape these conditions.[2] Moreover, based on the same observations, upon provided with this choice, applicants were not informed that, if they agree, they can lose access to the financial aid provided in the context of reception and, for those that may be granted international protection, to the Helios integration program, as both have a residency requirement strictly linked to ongoing stay in the Greek reception system. This practice stopped during the year 2024.</p> <p>A similar practice was observed in the Evros RIC, which since its operationalisation in 2013 has been exclusively functioning as a closed facility; to the extent that GCR is aware, applicants there were also</p>	<p>Section Reception Conditions, A,1,p 177</p>	<p>Asylum seekers and stateless persons who have completed the registration and identification procedure in any RIC & CCAC and do not wish to be accommodated within the National Reception System are obliged to inform the reception authority of their intention to depart. The applicants proceed by completing the declaration of voluntary departure, having previously been informed in a language that they understand the consequences of such departure, and in particular that it entails the termination of their accommodation and the discontinuation of the provision of reception conditions. In addition, following the completion of the reception and identification procedures and provided that the examination of their application has not yet been concluded, the Head of the Regional Service, upon instruction of the Head of the Reception and Identification Service (RIS), either due to urgent needs arising from an increase in arrivals or for the proper completion of the aforementioned procedures, may refer the applicants to an appropriate reception facility (Controlled Temporary Reception Facility for Asylum Seekers) for their temporary accommodation. The applicants are informed by the responsible unit of the centre in a language they can understand.</p>

<p>called to sign that they had been informed, with the support of an interpreter, of the possible consequences of signing the aforementioned declaration</p> <p>[2] As further reported in February 2024 by legal aid actors under the newly established Border Legal Aid sub-working group, which covers the islands of Lesbos, Samos and Kos, the text of the solemn declaration is as follows: “I do not wish to be accommodated at the CCAC of Samos or any other regional service of RIS. I will live on my own and the address is..... and I have been informed of the consequences of my nonappearance before the examining authority”. Information acquired on 12 March 2024.</p>		
<p>In practice, following the termination of the ESTIA accommodation programme in December 2022,^[1] camp-based accommodation has become the only available accommodation provided under the Greek reception system. As of the end of 2024, facilities used for this purpose included 24 Controlled Temporary Accommodation camps, the RICs of Orestiada, Malakasa and Diavata on the mainland, as well as Closed Control Access Centres (CCACs) operating –under EU funding– on the Eastern Aegean islands, where asylum applicants have continued being contained in prison-like conditions.^[2] The “<i>detention-like nature</i>” of island facilities was also noted by the EU Ombudsperson in the context of an own-initiative inquiry regarding the use of EU funds in the CCACs.^[3]</p> <p>To be noted, this new camp-based model of reception, which <i>inter alia</i> fosters conditions of social isolation for applicants, stands in stark contrast to the model promoted by the former ESTIA accommodation programme, the positive impact of</p>	<p>Section Reception Conditions, A,2,p 178</p>	<p>The Reception and Identification Service ensures that third-country nationals or stateless persons are guaranteed dignified living conditions. Preservation of family unity is safeguarded, as well as access to necessary emergency medical care, and to any required therapeutic treatment or psychosocial support. Particular attention is given to persons belonging to vulnerable categories, so that they receive appropriate treatment or special reception conditions on a case-by-case basis. Furthermore, adequate information is provided regarding their rights and obligations, as well as access to legal guidance, counselling, and support concerning their legal status. Applicants do also have the right to communicate with authorities and civil society organisations active in the protection of human rights, providing social and legal services, while the right to communicate with relatives and close persons is equally protected.</p> <p>The Ministry of Migration and Asylum in collaboration with IOM implements the program “Helios+” with the aim of assisting recognised refugees integration into the Greek society. It is important to note that any restriction on the freedom of movement of the residents is strictly limited to the duration required for the completion of the reception and identification procedures, in accordance with Article 40 of Law 4939/2022 (Government Gazette A’ 111). The maximum duration of such restriction does not exceed 25</p>

which had been noted by local communities as well.^[4] It also challenges Greece's ability to comply with obligations arising vis-à-vis vulnerable applicants with special reception needs,^[5] despite the reported willingness of the European Commission to continue the programme's funding in the context of supporting alternative modes of accommodation to camps.^[6]

[1] For more, AIDA, *Country Report Greece: 2022 Update*, June 2023, available at: <https://bit.ly/4cc0a07>, p. 147ff.

[2] Greek Council for Refugees / OXFAM / Save the Children International, *Greece: A two-tier refugee system*, Bi-monthly bulletin, May 2022, available at: <https://bit.ly/3OJOety>.

[3] EU Ombudsperson, *Decision in strategic inquiry OI/3/2022/MHZ on how the European Commission ensures respect for fundamental rights in EU-funded migration management facilities in Greece*, 11 July 2022, available at: <https://tinyurl.com/yckyjef3>.

[4] For instance, as noted in January 2023 by the President of the Developmental Agency (Anaptyxiaki) of Irakleio, Crete, and Mayor of Archanes Asterousia, Crete, '[t]he framework, the rules and the whole organisation of the hospitality [under ESTIA] was exemplary and gave no room to the xenophobia that was initially expressed'. Ekriti, *Crete: An end to the*

days from the date of entry into the RIC/CCAC. Beyond this period, applicants are granted freedom of movement, except in the exceptional cases provided for under Article 50 of the same law.

<p><i>hospitality program for refugees</i>, 2 January 2023, available in Greek at: https://bit.ly/3IEwj4h.</p> <p>[5] For the closure of ESTIA, see among others: RSA, <i>A Step backwards for protection and integration: On the termination of the ESTIA II housing programme for asylum applicants</i>, 22 December 2022, available at: https://bit.ly/43vr3Y5; GCR, Press Release, <i>Εξώσεις, αστεγία και πτωχόρισμα στην ένταξη</i>, 30 November 2022, available in Greek at: https://bit.ly/3oBev2B; FENIX, <i>Closure of ESTIA II: thousands of extremely vulnerable asylum seekers to be left without humane and adequate accommodation and proper care</i>, 31 October 2022, available at: https://bit.ly/43nPgzO.</p> <p>[6] Fenix, <i>Closure of ESTIA II: a political choice behind its closure</i>, December 2022, available at: https://bit.ly/3VbYagQ.</p>		
<p>Following a controversial press briefing on the Government’s operational plan for responding to the refugee issue, on 20 November 2019,^[1] it was announced that the island RICs would be transformed into Closed Reception and Identification Centres that would simultaneously function as Pre-Removal Detention Centres and which would have a capacity of at least 18,000 places.</p> <p>[1] Greek Government, <i>Political Press Briefing – the</i></p>	<p>Section Reception Conditions, B,1, 1.2, p 189</p>	<p>The CCACs are regional services of the Reception and Identification Service (“RIS”). The planning, monitoring, and supervision of their activities are ensured by the Directorate of RICs & CCACs, in cooperation with the Directorate of Support and the competent General Directorates of the Ministry of Migration and Asylum.</p> <p>Within the CCACs, a Reception and Identification Center, a temporary reception facility, as well as distinct areas with appropriate specifications for the accommodation of third-country nationals or stateless persons belonging to the vulnerable groups defined in Article 1(ly) of Law 4939/2022, may operate.</p> <p>In a separate area within the CCACs, a Pre-Removal Detention Center for Foreign Nationals</p>

<p><i>Government's Operational Plan for dealing with the migrant issue</i>, 20 November 2019, available in Greek at: https://bit.ly/2RO2Kml.</p>		<p>(PRO.KE.K.A.) may operate, under the administration of the Hellenic Police, as well as a Regional Asylum Office or an Independent Unit.</p>
<p>Notwithstanding, throughout 2024, people residing in the CCACs continued to be subjected to a “geographical restriction”, based on which they are under an obligation not to leave the island and to reside in the RIC facility (see Freedom of Movement). They also remain subject to strict entry-exit measures, such as having to undergo security controls (metal detectors and/or physical controls), and to being under an obligation to comply with permitted hours of exit and (re)entry, and with an obligation to stay in the CCAC during the night. Non-compliance with these obligations can <i>inter alia</i> lead to the reduction and/or withdrawal of material reception conditions in accordance with Article 61 Asylum Code.^[1]</p> <p>[1] Articles 6 and 9 of Decision 553695/2023 of the General Secretary for Reception of Asylum Seeker of the Ministry of Migration and Asylum regarding the General Regulation for the Operation of Closed Controlled Facilities, 31 December 2023. As per Article 9 of the same decision, the allowed hours of exit and (re)entry, which in practice largely mirror those imposed under previous measures aimed at combating spread of the coronavirus, are specified by a Decision of the Director of the RIS. Yet up to the time of writing it hasn't been possible to find said Decision.</p>	<p>Section Reception Conditions, B,1, 1.2, p 189</p>	<p>Applicants for international protection who enter the Greek territory through the islands of Lesbos, Samos, Kos, Leros, and Chios are subject to a restriction of movement solely within the island through which they entered the Greek territory. This restriction is indicated on the applicants' international protection cards. The geographical restriction primarily serves the swift processing and effective monitoring of applications for international protection, as well as the management of the population of applicants for international protection within the Greek territory.</p> <p>The restriction of freedom of movement of applicants for international protection on the islands does not infringe upon the inalienable sphere of private life of those subject to this measure, nor does it prevent the exercise of rights provided under national, European, and international legislation. It is emphasized that this restrictive measure is proportionate, given its nature and scope, as well as its limited duration, while its imposition serves an overriding public interest.</p> <p>The restriction of movement may be lifted by decision of the Head of the Regional Authority, particularly in cases involving unaccompanied minors, Dublin cases, persons whose applications are reasonably deemed to be well-founded, and vulnerable persons or individuals requiring special reception conditions, insofar as appropriate support cannot otherwise be provided.</p>

<p>Beyond overcrowding, testimonies refer to conditions of confinement and excessive surveillance. At the same time, there are significant recurring shortages, particularly of medical and psychosocial staff, interpretation services, and of basic necessities (food, bedding, hot water, milk intended for children, medication) and decent accommodation. Indicatively, in the same report, RSA highlights how during 2023 new arrivals in the Samos CCAC were forced to sleep on the floor, without mattresses, in a room originally intended to serve as a restaurant, due to the lack of actual accommodation places. Additionally, those residing in the public areas are subjects of constant surveillance, as the CCTV System inside the restaurant operates unceasingly on a 24/7 basis, violating the individual's privacy</p>	<p>Section Reception Conditions, B,2, 2.2, p 193</p>	<p>During the given period, the Regional Services of the Reception and Identification Service (RIS), as well as CCAC Samos, were under pressure due to increased migration flows and the resulting overcrowding. This situation necessitated the temporary use of administrative spaces beyond the existing accommodation facilities. Nevertheless, despite the steadily increasing flows, the Administrations ensured the immediate inclusion of third-country nationals in the reception and identification procedures, as well as their placement in appropriate and functional accommodation facilities, always considering any specific reception needs (e.g., unaccompanied minors, single-parent families, etc.)</p> <p>It is noted that, the security measures are primarily aimed at safeguarding the residents, within the designated safe areas for families, single women, safe zones for unaccompanied minors, and vulnerable groups in general.</p> <p>Undoubtedly, the provision of medical and psychosocial support had been a recurring challenge. However, since July 2024, the “Hippocrates I” program has been implemented under the coordination of the International Organization for Migration (IOM) and its partners. The program ensures adequate staffing of the Medical Screening and Psychosocial Support Units, as well as the provision of medical care and psychosocial support services operating within the structures of the RIS. At the current period, Hippocrates I project, staffed by twenty-nine (29) Field Coordinators – Social Workers (25 IOM staff). The personnel currently employed under the project amounts to a total of 252 staff members, while the total number of positions covered by the project is 261, as nine of these staff members are assigned to more than one facility. At the beginning of the project implementation (July 2024) until July 2025, 73070 unique individuals (male 52898 and female 20172) received services by Hippocrates I project. More specifically, 480005 services have been provided in the categories below: 390456 medical assistance, 52053 psychosocial assistance, 29695 referrals to public hospitals and 7801 vaccinations.</p> <p>With regard to nutrition, a balanced and culturally appropriate diet is consistently provided, designed to meet the dietary needs of all TCNs. Meals are distributed under hygienic conditions that fully comply with health and safety standards, and access to potable water is always ensured. Special provisions are made for the nutritional needs of infants and young children, as well as individuals</p>
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		<p>requiring specialized diets, including pregnant and lactating women and persons with health-related dietary restrictions</p>
<p>Meanwhile, as in previous years, during 2024 infrastructure-related problems continued to persist in the Samos CCAC. As reported by RSA in December 2024, there is still a <i>‘severe shortage of running and drinking water, despite the systems reported by the Ministry of Migration and Asylum regarding water supply and conservation. [...] Since there is no connection to a central water system, water is collected and distributed via tanker trucks connected to the facility’s main supply points.’</i> Moreover, according to the same report: <i>‘[t]he conditions of the containers was particularly concerning. Many were filthy, infested with bedbugs and cockroaches, while most beds lacked mattresses. Blankets were seemingly shared among residents, while there were broken plumbing fixtures overflowing with sewage, and blackened, dirty sanitary facilities (toilets, sinks, and showers). This situation was evident even in sectors housing families and vulnerable populations, who reportedly live in better conditions’.</i>^[1]</p> <p>[1] RSA, <i>Samos</i>, 10 December 2024, available at https://rsaegean.org/el/samos-2024/.</p>	<p>Section Reception Conditions, B,2, 2.2, p 195</p>	<p>The island of Samos has faced and continues to face severe water shortages due to a significant decrease in the aquifer caused by climate change. To address this issue, the Reception and Identification Service previously requested the assistance of the Fire Brigade and the Hellenic Army for the daily transport of water, as well as the assignment of a related project to a contractor following an international tender, while also deeming necessary the controlled distribution of water at specific times.</p> <p>To date, with water shortages on the island of Samos still persisting, the RIS has awarded a contract following an international tender, securing the supply of 51,175 cubic meters of water, an amount which, combined with the existing borehole and a small municipal water supply, will cover the water needs of the CCAC in Samos until the end of the current year (2025). In any case, three (3) liters of bottled water are distributed daily to each resident.</p> <p>The Ministry of Migration and Asylum takes the living conditions within all Reception and Identification Centers very seriously and is committed to ensuring that residents are accommodated in a safe, clean, and dignified environment. Through comprehensive cleaning and maintenance contracts (facility management), the Ministry provides for the daily sanitation and upkeep of all facilities, with special emphasis on hygiene and the immediate resolution of any issues that may arise.</p> <p>While it is acknowledged that temporary challenges may occur in situations of overcrowding, these challenges are systematically and swiftly addressed. The Ministry ensures that any such difficulties are short-lived, with corrective actions implemented promptly so that residents, including families and vulnerable individuals, continue to enjoy conditions of safety and care.</p> <p>Furthermore, continuous monitoring and oversight mechanisms are in place to guarantee that all facilities remain in full compliance with health, safety, and humanitarian standards.</p> <p>The overarching priority of the Ministry is to safeguard human dignity and provide an environment that reflects both respect for residents and adherence to national, European, and international standards. Despite the operational challenges that may naturally arise due to high inflows, the Ministry consistently</p>

		demonstrates the capacity and readiness to respond effectively, ensuring that living conditions always remain appropriate and humane.
<p>As further reported by RSA in December 2024, in Lesvos, living conditions inside the CCAC are characterised, among others, by a lack of hot water, shortages of clothing and blankets, poor-quality food and shortages in medical and psychological support.</p>	<p>Section Reception Conditions, B,2, 2.2, p 195</p>	<p>During times of heightened migratory flows, CCAC Lesvos encountered certain operational difficulties, including the temporary interruption in the provision of hot water. The Administration of the Centre, working closely with the Facility Management Services, acted swiftly to implement the necessary measures and restore these essential services without delay.</p> <p>A recurring challenge has been the steady provision of medical and psychosocial support. To respond effectively, the “Hippocrates I” programme was introduced in July 2024 under the coordination of the International Organization for Migration (IOM) and its partners. At the current period, Hippocrates I project, staffed by twenty-nine (29) Field Coordinators – Social Workers (25 IOM staff). The personnel currently employed under the project amounts to a total of 252 staff members, while the total number of positions covered by the project is 261, as nine of these staff members are assigned to more than one facility. At the beginning of the project implementation (July 2024) until July 2025, 73070 unique individuals (male 52898 and female 20172) received services by Hippocrates I project. More specifically, 480005 services have been provided in the categories below: 390456 medical assistance, 52053 psychosocial assistance, 29695 referrals to public hospitals and 7801 vaccinations.</p> <p>With respect to nutrition, all TCNs consistently receive a balanced and culturally appropriate diet tailored to their nutritional requirements. Food is prepared and delivered under hygienic conditions in full compliance with health and safety regulations, and continuous access to safe drinking water is ensured. In addition, specific dietary arrangements are made for infants, young children, pregnant and breastfeeding women, and individuals with particular health-related needs, thereby safeguarding the provision of appropriate and dignified care to all residents.</p>
<p>Dire conditions were also reported in the Kos CCAC by RSA in December 2024, a primary concern being the severe degradation of the facility's infrastructure,</p>	<p>Section Reception Conditions, B,2, 2.2, p 195</p>	<p>During the reporting period, it should be noted that the Regional Services of RIS, along with CCAC Kos, faced considerable pressure due to the intensified migratory flows and the resulting overcrowding. This resulted in significant damages caused to its infrastructure, in various</p>

characterised by significant structural defects, inadequate maintenance, and critical failures in sewage and biological treatment systems, often resulting in instances of raw sewage inundation. Further, the provision of food and potable water was reported as insufficient in both quality and quantity, with residents reporting adverse health effects, including dermatological issues, attributable to unsanitary living conditions and a critical lack of essential hygiene products

Ongoing challenges with regards to medical services were also reported. Based on GCR’s presence in the field in Kos, there is a total and **chronic lack of adequate medical services**, which also impacts locals. There is no capacity to actually screen vulnerabilities or provide them with the health care they need. **Unaccompanied and separated children face additional barriers** when they reach the CCAC. Until a guardian is appointed, **these children have no one to provide them with clothes, shoes or a cell phone to call home and talk to their family. Unaccompanied children also have to spend about two to three weeks in a fenced area called a ‘safe area’ until they are transferred to a shelter for unaccompanied children. There is nothing to do in the safe area, no activities, recreational or otherwise. It is a container surrounded by barbed wire.**^[1]

[1] GCR, *Refugee and migrant children arrivals in Greece quadruple this year*, press release, 17 July 2024, available [here](#).

areas. However, CCAC Kos’ Administration took all necessary actions to promptly report and address any damages, with the competent Technical Service being immediately informed to undertake the required restorations.

One of the recurring challenges has been the consistent provision of medical and psychosocial support. To address this, the “Hippocrates I” programme was launched in July 2024, coordinated by the International Organization for Migration (IOM) and its partners. The programme ensures sufficient staffing of Medical Screening and Psychosocial Support Units, and strengthens the delivery of healthcare and psychosocial services within the Reception and Identification Service (RIS) structures.

With regard to nutrition, a balanced and culturally appropriate diet is consistently provided, designed to meet the dietary needs of all TCNs. Meals are distributed under hygienic conditions that fully comply with health and safety standards, and access to potable water is always ensured. Special provisions are made for the nutritional needs of infants and young children, as well as individuals requiring specialized diets, including pregnant and lactating women and persons with health-related dietary restrictions.

The Ministry of Migration and Asylum places the utmost priority on the protection and well-being of unaccompanied children. The so-called “safe areas” within the Reception and Identification Centers are specifically designed to provide a secure and controlled environment for minors until their swift transfer to specialized shelters for unaccompanied children.

During their short stay unaccompanied children benefit from constant supervision, safety, and care, ensuring that their immediate protection needs are fully met. These areas are not intended as long-term accommodation but rather as a necessary transitional measure, safeguarding children until suitable placements become available in dedicated facilities.

The existence of “safe areas” demonstrates the commitment of the Ministry to prioritize the security and rights of minors, while ensuring full compliance with national, European, and international child protection standards. Although challenges may arise due to the high number of arrivals, the Ministry consistently addresses them promptly, with the overarching aim of

		guaranteeing that all unaccompanied children are accommodated in conditions of dignity, safety, and care.
<p>Additionally, over the last year, there has been a significant increase of arrivals in South-western Greece (<i>i.e.</i>, Crete island, Gavdos island, etc), where no Reception and Identification Centers or any other form of migration/accommodation infrastructure exist. The authorities have proven unable to effectively manage the situation, leaving people for days or even weeks in miserable conditions and bypassing the reception and identification procedures provided by law or even arbitrarily submitting people to automatic detention.^[1]</p> <p>In July 2025, following the Greek government’s decision to suspend access to asylum for those arriving to Greece from Northern Africa, in blatant disregard for international, EU and national law,^[2] newly arrived applicants to (primarily) Crete and Gavdos started being transferred to PRDCs, with no access to reception. As per GCR’s observations in Amygdaleza PRDC on 24 July 2025, newcomers subject to this measure had not received any information on the procedures to be followed, nor on the reasons for their detention.</p> <p>[1] GCR Submission to the UN Human Rights Committee, Greece’s State Party Report, 142nd Session, 14 October 7 November 2024, September 2024.</p> <p>[2] See Joint NGO statement, The unlawful suspension of access to asylum in Greece must be immediately withdrawn, 16 July 2025, available at: https://tinyurl.com/2v83d4zk.</p>	Section Reception Conditions, B,2, 2.2, p 196	<p>Third-country nationals and stateless persons who enter the country without the required legal formalities or who reside in Greece without legal formalities, and who cannot prove their nationality and identity by means of a public authority document, are subject to reception and identification procedures. Such persons are immediately referred, under the responsibility of the competent police or coast guard authorities, to a Reception and Identification Centre (RIC) or to a Closed Controlled Facility.</p> <p>On the island of Crete, no Regional Service of the Reception and Identification Service (RIS) exists. Consequently, newly arrived third-country nationals or stateless persons entering the Hellenic territory are referred, under the responsibility of the aforementioned competent authorities, to a Reception and Identification Centre or to a Closed Controlled Facility. It should be noted that, in all Closed Controlled Facilities of the islands, every possible effort is made to ensure that newly arrived third-country nationals/stateless persons are immediately subjected to reception and identification procedures, in line with the provisions of Articles 39 et seq. of Law 4939/2022.</p> <p>According to Article 79 of Law 5218/2025 (Government Gazette A’ 125/14-07-2025), the submission of asylum applications is suspended for persons entering the country irregularly by any sea vessel departing from North Africa. Therefore their management does not fall within the competence of the Reception and Identification Service. Nevertheless, the following categories of persons identified as vulnerable during screening are expressly exempted from the implementation of this provision and are referred to the regular reception and identification procedures, in accordance with Articles 38 et seq. of Law 4939/2022, and are transferred by the Police Authorities as soon as possible to the nearest Reception and Identification Centre (RIC) or Closed Controlled Facility (CCF). These persons, pursuant to a permissible specification of Article 1, item lg of Law 4939/2022, are the following:</p>

		(a) persons aged seventy (70) years and above, whose age is proven by identification documents or is visibly ascertainable, (b) women travelling alone, (c) single-parent families with minor children, (d) persons suffering from serious, visibly ascertainable or duly certified illnesses (such as amputations, paraplegia, cancer, etc.), and (e) unaccompanied minors, whose age is proven exclusively by identification documents or is visibly ascertainable.
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3. Detention of Asylum Seekers

4. Content of International Protection

5. Additional remarks

C. Reply by the NGO Registry Unit of the General Secretariat for the Reception of Asylum Seekers

G. Information for asylum applicants and access to NGOs and UNHCR

2. Access to NGOs and UNHCR

Reference from the country report	Page and section	Comments, corrections, or additional statistical information and updates
On 6 November 2023, RSA requested statistical data on the number of organisations and individuals approved, rejected and/or de-registered from the Registry since its establishment, but the request received no reply by the MoMA.	G.2., page 171	This refers to RSA request of 6 November 2023 to the Statistics Department of the Ministry of Migration and Asylum for statistics on implementation of its NGO Registry (see Checks & Balances: Civil Society) and on the activities of its Fundamental Rights Officer (see Checks & Balances: Independent Authorities); Ref. No RSA β/105/06.11.2023.
		Our document under protocol number 42831/10-03-2025 has been issued with the subject: Request for Information (RSA) - Statistics on the operation of the NGO Registry and the "structured dialogue" of the Ministry of Migration and Asylum with civil society organizations, following an email dated 29/10/2024 from Mr. Minos Mouzourakis, legal counsel for the non-profit civil company "REFUGEE SUPPORT AEGEAN," with the attached document under protocol number b/142/29.10.2024 from the aforementioned company, with the subject "Statistics on the operation of the NGO Registry and the 'structured dialogue' of the Ministry of Migration and Asylum with civil society organizations."
As of October 2021, at least three refugee-assisting organisations have been denied registration. The Greek Ombudsperson has	G.2., page 171	The following has been issued: Decision no. 341617/25-10-2021, "Rejection of the application for registration and certification in the Registry of Hellenic and Foreign Non-Governmental

<p>since called for the re-examination of the rejection decision as it found that it resulted in violation of national, EU and international law”.</p>		<p>Organizations (NGOs) of the Ministry of Migration and Asylum for the Non-Profit Civil Company 'REFUGEE SUPPORT AEGEAN'," by the Special Secretary for the Coordination of Involved Bodies. "REFUGEE SUPPORT AEGEAN" submitted a subsequent electronic registration application on 26/2/2022 (protocol no. 116676/28-2-2022) to the Registry of Hellenic and Foreign Non-Governmental Organizations (NGOs) of the Ministry of Migration and Asylum via the online application ngo.migration.gov.gr and a supplementary application with supporting documents on 14/3/2022. Decision no. 235976/28-04-2022, "Registration in the Registry of Hellenic and Foreign Non-Governmental Organizations (NGOs) of the Ministry of Migration and Asylum and simultaneous granting of certification to the Non-Profit Civil Company 'REFUGEE SUPPORT AEGEAN' with the distinctive title 'SUPPORT'," was issued by the Special Secretary for the Coordination of Involved Bodies. With this decision, the company was registered in the Registry of Hellenic and Foreign Non-Governmental Organizations (NGOs) of the Ministry of Migration and Asylum and was assigned Registry Number ID3142. No information is provided about which are the other two organizations mentioned.</p>
<p>"Registry of Greek and Foreign Non-Governmental Organisations (NGOs) in the Special Secretariat for the Coordination of Involved Agencies of the Ministry of Immigration and Asylum."</p>	<p>G.2., page 170</p>	<p>The correct is: "<i>Registry of Greek and Foreign Non-Governmental Organisations (NGOs) in the Secretary General for Reception of Asylum Seekers</i>", according to Presidential Decree 77/2023 and the Ministerial Decision 148104/2024"</p>
<p>"The registration of these persons in the Registry and their certification is a necessary condition both for their activity within the Greek territory and for their cooperation with public bodies"</p>	<p>G.2., page 170</p>	<p>The correct is "The registration of these persons in the Registry and their certification is a necessary condition both for their activity within the Greek territory, in the fields of international protection, immigration and social integration". According to Article 10 of Ministerial Decision 10616/2020, only individuals who are active in the fields of international protection, migration, and social integration are required to register in the Registry of the Ministry of Migration and Asylum.</p>
<p>"GCR is aware of several instances when access was refused to interpreters and on occasion lawyers or were obliged to wait for several hours before they were granted permission to enter"</p>	<p>G.2., page 170</p>	<ul style="list-style-type: none"> • The registration of members in the NGO Members' Registry of the Ministry of Migration and Asylum aims to prevent access to, and direct contact with, asylum seekers by individuals exhibiting unlawful or inappropriate behavior, and to ensure the safety of the beneficiaries. • Lawyers are not subject to the certification provisions for members set out in Ministerial Decision 10616/2020, as they are governed

		<p>by a special legal framework and may carry out their activities and provide legal services by presenting their bar association ID, without the need for further certification.</p> <p>(See also the response of the Athens Bar Association, ref. no. 239/22-6-2021, and the response of the Special Secretary for the Coordination of Involved Bodies, ref. no. 131513/15-7-2021).</p>
"The criticism focuses on the lack of meaningful public consultation"	G.2., page 171	<p>Actions have been taken to establish a regular and structured dialogue with civil society organizations. On 27/05/2025, a questionnaire was sent to the registered organizations, requesting them to evaluate the registration and renewal procedures in the Registry, the functioning of the Registry and the applicable legal framework, their proposals for improving cooperation with the Ministry. In addition, the organization of a meeting is currently being planned with registered NGOs, on October 3rd 2025.</p>
"the excessive requirements for registration/certification, which serves as a precondition for NGOs to be able to operate in Greece in the field of international protection, migration and social inclusion"	G.2., page 171	<p>The documents required for the registration/certification are basic documents that the stakeholders already have at their disposal and use in their transactions with Greek public services.</p>

Overview of the legal framework, Main implementing decrees, guidelines and regulations on asylum procedures, reception conditions, detention and content of international protection.

Reference from the country report	Page and section	Comments, corrections, or additional statistical information and updates
Decision No 3063 on the Register of Greek and foreigner NGOs and Register for the members of NGOs (Gazette B/1382/14.4.2020)	Overview of the legal framework, Main implementing decrees, guidelines and regulations on asylum procedures, reception conditions, detention and content of international protection, page 16	Ministerial Decision 3063/2020 has been repealed and replaced by Joint Ministerial Decision 10616/2020 (Gazette B/3820/9.9.2020).