

RECOGNISED REFUGEES 2026

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Access of beneficiaries of international protection to documents and socio-economic rights

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Introduction*

Recognised refugees face constant barriers to a dignified life in Greece, from a bureaucratic maze to obtain essential documents to the absence of housing and to restrictions on access to health care and other core services. These trials stem from chronic, complex issues documented by Refugee Support Aegean (RSA) and Stiftung PRO ASYL in yearly reports.

The rights and entitlements tied to international protection status in Greece are enshrined in the 1951 Refugee Convention, the European Union (EU) Qualification Directive¹ and domestic law.²

Guaranteeing them in practice requires one to navigate extensive processes falling within the responsibility of different branches of government, not least six different Greek ministries. Discrete public services reporting to separate ministries may be involved in the same administrative procedure. For example, competence for issuing the **Residence Permit** lies both with the Asylum Service under the Ministry of Migration and Asylum and the Hellenic Police under the Ministry of Citizen Protection. The two authorities express conflicting views as to the reasons behind chronic delays in the renewal of residence permits, as discussed below. Responsible authorities for the Social Security Number (**AMKA**) include the Ministry of Migration and Asylum, Citizens Service Centres (*Κέντρα Εξυπηρέτησης Πολιτών*, KEP) and the National Social Security Fund (*Ενιαίος Φορέας Κοινωνικής Ασφάλισης*, EFKA), the latter under the Ministry of Labour and Social Security. Tasks and duties have yet to be clearly allocated between these services. As a result, people are frequently referred from one service to another.

The European Commission has stressed in its dialogue with the Greek authorities the importance of “establishing a seamless collaboration and communication framework among various governmental departments and ministries to ensure a unified, coherent approach to the integration process”.³ The Greek government launched a Task Force on integration in 2024,⁴ without it contributing, however, to tackling the chronic obstacles to recognised refugees' access to documents and socio-economic rights stemming from their status and necessary for a dignified life in Greece.

* This report was written by Minos Mouzourakis, Lawyer & Advocacy Officer at Refugee Support Aegean (RSA). RSA thanks the Greek Council for Refugees (GCR), SolidarityNow and Meraki Humanitarian Support for contributing information to questions we submitted in the context of the present research. Special thanks to Mariangela Psyrraki, Social Worker at Meraki Humanitarian Support, for her contribution and support to the research.

¹ Directive 2011/95/EU of the European Parliament and of the Council of 13 December 2011 on standards for the qualification of third-country nationals or stateless persons as beneficiaries of international protection, for a uniform status for refugees or for persons eligible for subsidiary protection, and for the content of the protection granted (recast) [2011] OJ L 337/9.

² Articles 19 et seq. Asylum Code, L 4939/2022, Gov. Gazette A' 111/10.06.2022.

³ European Commission, Letter to the Minister of State, Ares(2023)8268343, 4 December 2023, 9.

⁴ European Commission, 'Task Force on migrant integration launched in Greece', 28 May 2024, available [here](#).

Despite persisting, chronic barriers documented every year in our report, Greece insists on a policy demanding immediate autonomy and self-sufficiency of beneficiaries of international protection. These people are called to vacate the accommodation places they held in camps during the asylum process within 30 days from being granted asylum. Material reception conditions are immediately ceased when a positive asylum decision is taken.

Importantly, the year 2025 marked a continuation of the near-total halt of essential reception services for refugees seeking asylum in Greece. This includes: the absence of state interpretation services in refugee camps and asylum authorities, with interpretation needs covered only by the European Union Agency for Asylum (EUAA); systematic gaps in medical and psychosocial staff in camps; constant lack of transport services connecting camps to urban centres; and a complete halt of the monthly financial allowance to asylum seekers over the past twelve months. Deficient programming and management of funding on the part of the Ministry of Migration and Asylum is an enduring problem within the Greek asylum system and a constant source of concern for the European Commission.⁵

Key figures

More than 167,000 people have been granted international protection in Greece from 2020 to 2025. Greece granted international protection to 27,181 people last year alone and to 40,237 people in 2024.

The Greek authorities do not keep statistics on the number of recognised refugees⁶ or temporary protection holders living in Greece. At the end of 2025, 96,438 international protection **Residence Permits** of the Asylum Service were active and 19,398 initial permits were pending issuance.⁷ Another 38,138 temporary protection residence permits were active at that time.

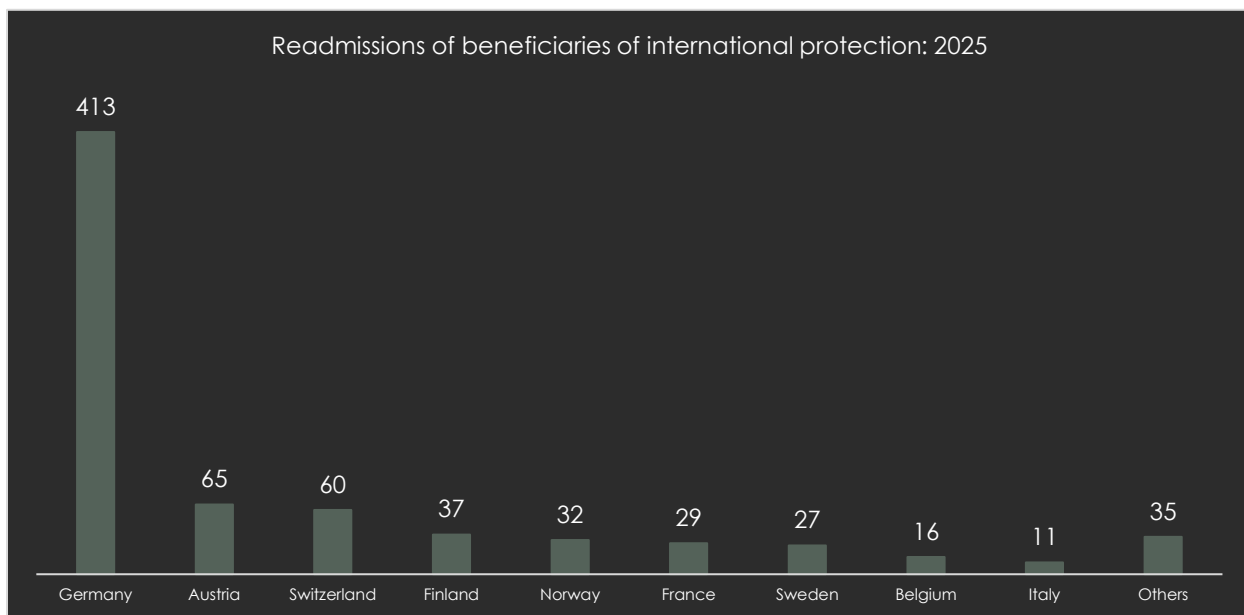
Systemic barriers to recognised refugees' access to documents and to core rights are exacerbated by the significant rise in deportations of beneficiaries of international protection from other EU Member States and Schengen Associated States due to the status they hold in Greece.⁸ Last year alone, Greece received 9,179 readmission requests from other European countries concerning recognised refugees, more than triple the number received in 2024 (2,468). Most requests came from Germany, pointing to a 555% increase from 2024 to 2025 according to the Hellenic Police. We recall that these requests exclude Dublin Regulation cases relating to people entering or seeking asylum in Greece without receiving international protection.

⁵ Namely, European Commission, Email correspondence: 'Meeting between DG Gminder / Greek Minister for Migration and Asylum', Ares(2025)357776, 2 October 2025; *Mission Report – Visit of HOME DG Gminder to Greece 8-9 September 2025*, Ares(2025)9223739, 9 September 2025; *Mission Report: Technical visit to Samos and Athens – September 2024*, Ares(2024)6443981, 11 September 2024.

⁶ This report uses the terms "recognised refugee" or "beneficiary of international protection" to describe refugee status holders and subsidiary protection holders.

⁷ Ministry of Migration and Asylum, Reply to parliamentary question, 24207/2026, 6 February 2026, available [here](#).

⁸ RSA, *Recognised refugee statistics in Greece in 2025*, 23 March 2026, available [here](#).



Source: Ministry of Citizen Protection, Reply to parliamentary question, 27 Jan 2026, [here](#)

725 recognised refugees were deported to Greece in 2025, including families with children. This is a notable increase compared to 390 people deported in 2024. These readmissions do not include cases of people who voluntarily departed from other countries and returned to Greece after receiving a negative asylum decision and/or a return order there.

Methodology

This RSA and Stiftung PRO ASYL report tracks the procedures and barriers facing recognised refugees present in Greece or returned thereto from other European countries, which affect their access to a series of **Essential Documents** and basic rights for their dignified living such as **Housing**, **Health Care** and **Social Welfare**.⁹ The report also analyses deficiencies in **Information & Support** from responsible authorities and services to people for the purpose of claiming their rights.

The observations made in the report draw on RSA legal and social casework supporting at least 50 people holding protection status in Greece and deported or returning thereto from other European countries from the start of 2025 to present. The main features of the cases are as follows:

⁹ This report does not analyse access to rights such as family reunification. For more information thereon, Greek Council for Refugees, *Family reunification of recognised refugees in Greece*, July 2025, available [here](#).

Returnees to Greece supported by RSA since 1 Jan 2025					
By country of origin		By point of return		By population group	
Afghanistan	34	Germany	35	Men	35
Palestine	5	Switzerland	11	Women	9
Syria	4	Sweden	2	Children	6
Others	7	Netherlands	2		

The report also draws on findings of qualitative research conducted through a questionnaire to civil society organisations coming to contact with beneficiaries of international protection deported or returning to Greece from other countries, and on publicly available information such as up-to-date statistics of the Greek authorities and documents of EU institutions granted upon request for access.

Quagmire of procedures for essential documents

Recognised refugees' access to essential rights and transactions with public services in Greece is conditioned on possession of a series of documents, issued by various national authorities.

The specific procedures for each document are outlined in discrete legal texts which provide the necessary documentation (*δικαιολογητικά*) one must present to issue or obtain each document. In practice, however, Greek public authorities tend to resort to and to invoke instructions that depart from the rules laid down in law. These instructions are often unpublished and are not shared with the persons concerned. Indicative examples of internal instructions that are not made available even upon request are currently encountered in the process of **Retrieval of Withheld Documents** by another Member State, in the registration of applications for renewal of **Residence Permits** and in the issuance of the Insured Person Number (**AMA**).

The process of obtaining the necessary documents to reside and participate in public life in Greece is complex and often leads to 'catch 22' situations, where the issuance of one document may presuppose possession of another document or compliance with conditions that are virtually impossible to meet. For example:

- ❖ The process of updating personal details on the tax records of the Independent Authority for Public Revenue (*Ανεξάρτητη Αρχή Δημοσίων Εσόδων*, AADE) is done online and requires **TAXISnet Credentials**. To obtain such credentials, however, one would need to have updated their personal details on the AADE records.
- ❖ Disabled recognised refugees wishing to obtain an **Unemployment Card** from the Public Employment Service (*Δημόσια Υπηρεσία Απασχόλησης*, DYPA) must already hold a **Disability Certification** so as to be registered as unemployed persons with a disability. Requesting a disability certification, however, requires an **Active AMKA** which in turn presupposes secured lawful **Employment** and a work contract or recruitment certificate from an employer.
- ❖ Enrolment on the **HELIOS+ Programme** requires an **Unemployment Card**, among other documents. Yet, in order to receive rental subsidies, the only financial assistance offered by the programme, beneficiaries must have already rented property on their own means.
- ❖ Refugees seeking to register with EFKA and receive **AMA** so as to start working must have already secured housing in order to produce **Proof of Residence Address**.

In our experience, there are no indications of preferential treatment afforded to specific nationalities or language groups in terms of issuance of the different documents required for participation in public life in Greece. The following sections analyse the conditions and practice underlying the issuance of the essential documents in question.

Residence permit (ADET)

According to the prospective EU Qualification Regulation, applicable as of June 2026, Member States must issue a residence permit to beneficiaries of international protection within 90 days from the delivery of a positive asylum decision.¹⁰ The Asylum Service already concedes that compliance with this obligation requires reinforcements in the organisational capacity of the Greek authorities,¹¹ meaning that it cannot observe those deadlines under its current organisational setup.

Under Greek law, refugee status holders are entitled to a residence permit (*Άδεια Διαμονής Ενιαίου Τύπου*, ADET) valid for three years, while beneficiaries of subsidiary protection receive a one-year permit.¹² Possession of a valid ADET is a prerequisite for a series of steps such as obtaining and maintaining **AMKA**, opening a **Bank Account**, accessing **Employment**, applying for and receiving **Social Welfare** benefits, renting property, even moving within the Greek territory. The European Commission highlights that “The issuance and renewal of resident permits is the initial and first formality that serves as a prerequisite for others and yet is the most important bottleneck.”¹³

The Asylum Service is the competent authority for the issuance of residence permits to beneficiaries of international protection granted status from mid-2013 onwards, though certain steps of the process are delegated to the Hellenic Police:



¹⁰ Article 24(2) Regulation (EU) 2024/1347 of the European Parliament and of the Council of 14 May 2024 on standards for the qualification of third-country nationals or stateless persons as beneficiaries of international protection, for a uniform status for refugees or for persons eligible for subsidiary protection and for the content of the protection granted [2024] OJ L 22.5.2024.

¹¹ European Commission, Email correspondence: ‘Meeting with GAS on 13 November’, Ares(2025)4503310, 13 November 2024.

¹² Article 23(1) Asylum Code.

¹³ European Commission, Letter to the Minister of State, Ares(2023)8268343, 4 December 2023, 10.

First step: Asylum Service decision

Initial ADET grant

The process of granting ADET to beneficiaries of international protection starts with the issuance of an “ADET Decision” by the Asylum Service. This decision is issued by the Regional Asylum Office (RAO) or Autonomous Asylum Unit (AAU) that granted international protection to the person concerned¹⁴ and consists in approval of the grant of a residence permit. This decision is a necessary but not sufficient condition for issuing a residence permit.

According to the ADET Regulation, the ADET Decision shall be incorporated in the asylum decision taken by the Asylum Service or the Appeals Authority.¹⁵ A circular of the Ministry of Migration and Asylum states that the decision must in any event be notified to the beneficiary on the same day as the asylum decision.¹⁶ Despite this rule, the Asylum Service continues to issue ADET Decisions as separate administrative acts, notified to the persons concerned together with the decision approving the asylum application.

Serious administrative hurdles arise already at this stage and hamper refugees' access to the ADET issuance process. These include gaps in formal elements of Asylum Service decisions or errors in beneficiaries' personal details such as gender. In addition, many asylum decisions and ADET Decisions of the Asylum Service notified via email do not carry a signature or stamp or have a digital stamp from an officer different than the one issuing the decision. As a result, these decisions are not accepted as documents for the purpose of ADET issuance. This difficulty persists in 2026 and is encountered particularly in decisions notified via email per established Asylum Service practice,¹⁷ even to asylum seekers residing in camps of the reception system, to whom decisions must be notified in person.¹⁸ These issues may create obstacles in the **Second Step** of the process, as described below.

Territorial competence of the issuing office: The RAO or AAU of the Asylum Service issuing the ADET Decision and asylum decision must correspond to the area of competence of the Passport Office of the Hellenic Police which is to receive the documents and print the ADET, as described below regarding the **Second Step** of the process. For example, the Aliens Unit of Attica (*Τμήμα Αλλοδαπών Αττικής*, TAA) is territorially competent for cases falling within the remit of the RAO and

¹⁴ The Attica Directorate of the Asylum Service contains three RAO and six AAU in the Attica region: Article 29 PD 106/2020, Gov. Gazette A' 255/23.12.2020, as amended by Article 10 PD 77/2022, Gov. Gazette A' 212/17/11.2022.

¹⁵ Articles 2(1) and (3) ADET Regulation, JMD 513542/2022, Gov. Gazette B' 4763/12.09.2022.

¹⁶ Ministry of Migration and Asylum, Circular 68883/2023 – *Εγκύκλιες οδηγίες σχετικά με την εφαρμογή της με αρ. 513542 Κοινής Υπουργικής Απόφασης (ΦΕΚ Β' 4763/12.09.2022) «Διαδικασία χορήγησης Άδειας Διαμονής Ενιαίου Τύπου στους δικαιούχους διεθνούς προστασίας»*, 31 January 2023, 2.

¹⁷ See e.g. European Commission, *Updated Samos report*, Ares(2024)7041697, 5 August 2024, 2.

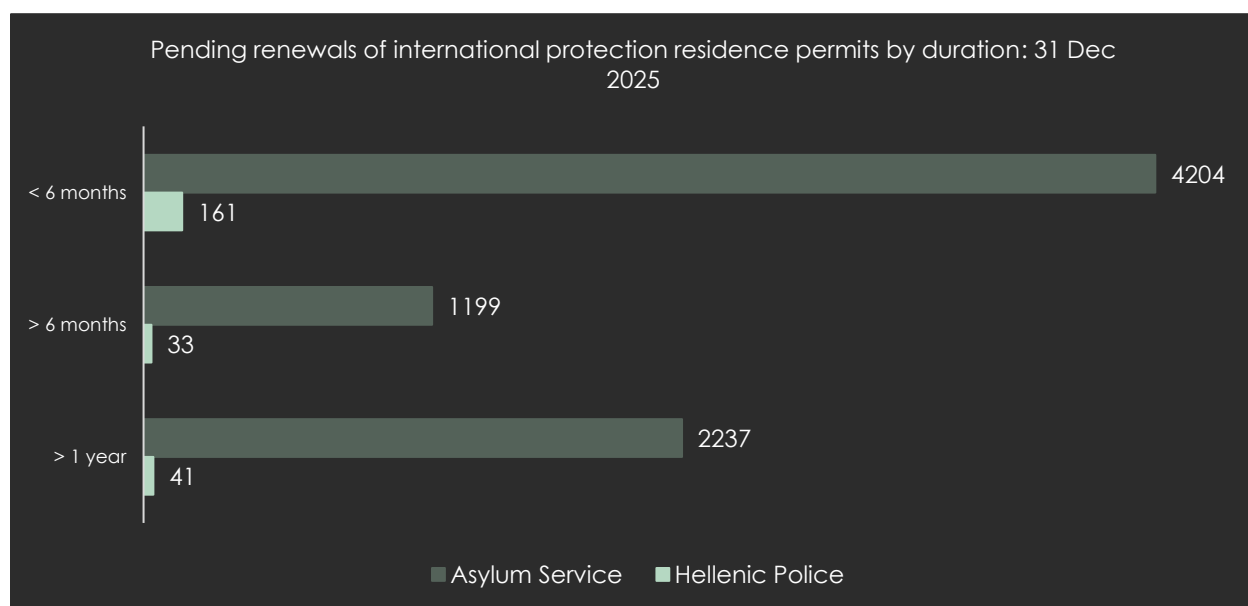
¹⁸ Article 87(4) Asylum Code provides that the notification of decisions to persons residing in the reception system shall take place in their camp of residence. The provision therefore prohibits notification of decisions via email to people residing in camps: Administrative Court of Thessaloniki, ΑΔ6/2025, 13 January 2025, para 7; Administrative Court of Athens, ΝΔ324/2024, 28 June 2024, para 8, available [here](#).

AAU of Attica,¹⁹ where most requests for ADET are filed.²⁰ Otherwise, the Hellenic Police does not accept the application and the beneficiary of international protection must approach a territorially competent RAO or AAU to receive exact copies of their asylum decision and ADET Decision, stamped by that office. This issue arises frequently in the cases of people applying for asylum on the Eastern Aegean islands and recognised as refugees after being transferred by the authorities to mainland camps, often by decision of the initial RAO notified to them via email and not in person.

Further obstacles emerge in the particular case of children born in Greece after their family has lodged an asylum claim. These children are often registered by the Asylum Service with a different case number from their family members. This leads to more delays and hurdles in the issuance of ADET for the entire family.

ADET renewal

According to official figures supplied in response to parliamentary questions, the number of ADET renewal applications pending before the Asylum Service at the end of 2025 was 7,640. Of those, 2,237 were pending for more than one year. The Hellenic Police had 235 pending ADET renewal applications from people who sought asylum before the launch of the Asylum Service in 2013.

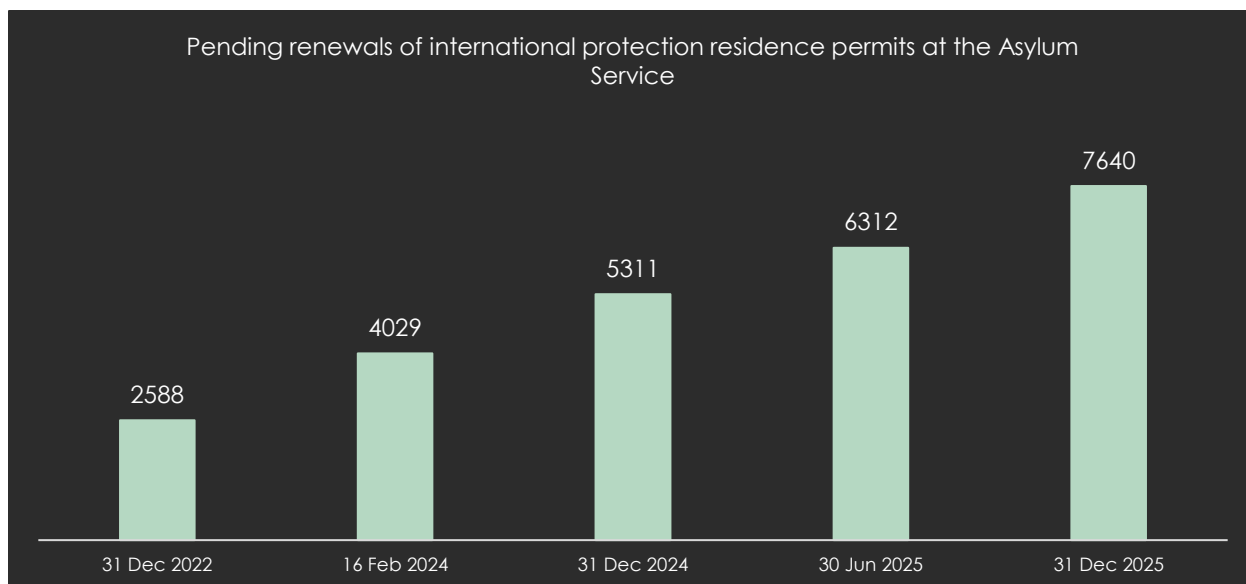


Source: Ministry of Migration and Asylum, Reply to parliamentary question, 6 Feb 2026, [here](#); Ministry of Citizen Protection, Reply to parliamentary question, 27 Jan 2026, [here](#)

Official Greek data demonstrate a significant, steady increase in the backlog of ADET renewal applications pending at the Asylum Service over the past few years:

¹⁹ Article 5(1) ADET Regulation.

²⁰ Hellenic Police, 'Δικαιούχοι διεθνούς προστασίας – Επιστολή νομικών οργανώσεων', 1619/24/258242, 11 December 2024, para 1.



Source: Ministry of Migration and Asylum, Reply to parliamentary question, 6 Feb 2026, [here](#), RSA & Stiftung PRO ASYL, [here](#) and [here](#)

The Asylum Service has generally stressed to the EU institutions that it is “confronted with numerous staff resignments” that affect its capacity.²¹ More recent statements noted that “The number of recruits on their own side in 2024 was zero. On the contrary [the Asylum Service] lost staff to other Ministries due to internal competitions.”²²

Modalities of submission of application: Beneficiaries of international protection who have been granted status by the Asylum Service and wish to renew their ADET must submit an “Application for Renewal of Residence Permit” and a digital photograph via email to AAU Beneficiaries of International Protection, the sole unit responsible for receiving and processing applications for renewal of ADET issued by the Asylum Service.²³ Despite consistent assurances of the Asylum Service towards setting up a dedicated platform for ADET renewal applications,²⁴ these requests are still submitted via email to a specific address of AAU Beneficiaries of International Protection: gas.residencepermits@migration.gov.gr.

The ADET renewal application form must contain the beneficiary’s personal details, the number of the ADET to be renewed, a residence address in Greece, and contact details i.e. phone number and email address.

Whereas Greek law expressly provides as of September 2025 that the service receiving the ADET renewal application shall issue a “certificate of submission”,²⁵ AAU Beneficiaries of International

²¹ European Commission, Email correspondence: ‘reception and asylum updates’, Ares(2024)7852259, 12 July 2024.

²² European Commission, Email correspondence: ‘meeting with the GAS on 27 January’, Ares(2025)4795018, 28 January 2025.

²³ Persons granted status by the Hellenic Police prior to the launch of the Asylum Service in 2013 follow a different, more onerous process.

²⁴ Asylum Service, ‘Ανανέωση Ταυτοποιητικών Εγγράφων Δικαιούχων Διεθνούς Προστασίας’, 58515/2024, 16 February 2024, 2.

²⁵ Article 23(1) Asylum Code, as amended by Article 31 L 5226/2025, Gov. Gazette A’ 154/08.09.2025.

Protection still sends no confirmation – even automated – that it has received the email sent by beneficiaries and that it has registered the ADET renewal application. Accordingly, beneficiaries of international protection continue to receive no information on the receipt of their application. Only upon request to a different office of the Asylum Service may they obtain a “certificate of asylum status” indicating the submission of the application for renewal.

Time limits for submission of the application: ADET renewal applications must be submitted to the Asylum Service no later than 30 days prior to the expiry of the permit. Late renewal applications without due reasons face a 100 € fine.²⁶ A Circular of the Ministry of Migration and Asylum specifies that “reasons” should be interpreted as follows: “the mere submission of any reason for negligence on the part of the beneficiary in submitting the application in time shall not suffice. Reasons shall be given which in fact justify exceeding of the deadline set by law on the basis of objective criteria or events, without mandatory written evidence. The reasons invoked by the applicant shall be accepted where they are in line with the conduct of the ordinary reasonable person.”²⁷

Greek law does not lay down any maximum time limit prior to which an application for ADET renewal is prohibited. In practice, however, AAU Beneficiaries of International Protection has refused to receive renewal applications on the ground that they were not filed within a short period of time from the impending expiry of the residence permit:

Single man deported from Germany: Bashir*, a recognised refugee from Afghanistan, was deported from Germany to Greece in March 2025 with a valid ADET. In February 2026, he requested renewal of his residence permit which expires in November 2026. AAU Beneficiaries of International Protection replied to RSA lawyers as follows: “the present application cannot be registered, given that the beneficiary’s ADET expires after several months... You will have to send the application anew with all the necessary documents in attachment 3-4 months prior to the expiry of the residence permit.” RSA requested clarification on the legal basis for not receiving ADET renewal applications submitted beyond said timeframe from the expiry of the ADET, stressing that thousands of applications are pending even for periods exceeding one year in light of the current workload of the Asylum Service.

In early March 2026, AAU Beneficiaries of International Protection replied that according to “internal instructions” of the Asylum Service on ADET renewal applications, “the submission thereof is foreseen to take place approximately four months before the date of expiry of the ADET”. RSA requested the internal instructions. In mid-March, AAU Beneficiaries of International Protection responded that “these are oral guidelines, shaped through daily administrative practice in the nine years of AAU BIP” and stated that the ADET renewal application was registered “purely exceptionally and despite the established practice” of the service.

Delays in registration of renewal applications: Greek law states that any document received by a public authority shall be registered on the same day,²⁸ as recalled by the Greek Ombudsman to

²⁶ Article 23(1) Asylum Code; JMD 513551/2022, Gov. Gazette B' 4763/12.09.2022.

²⁷ Ministry of Migration and Asylum, Circular 69244/2023 – Εγκύκλιες Οδηγίες σχετικά με την εφαρμογή της με Αριθμ. 513551/05.09.2022 (B' 4763) Κοινής Απόφασης των Υπουργών Οικονομικών και Μετανάστευσης και Ασύλου «Καθορισμός του αρμόδιου οργάνου επιβολής και της διαδικασίας βεβαίωσης του προστίμου του έβδομου εδαφίου της παρ. 1 του άρθρου 23 του ν. 4939/2022 (Α' 111)», 1 February 2023, 4.

²⁸ Article 12 Administrative Procedure Code, L 2690/1999, Gov. Gazette A' 45/09.03.1999.

the Asylum Service specifically as regards ADET renewal applications.²⁹ In cases represented by RSA, we continue to witness delays in the registration of ADET renewal applications submitted to AAU Beneficiaries of International Protection. Uploading the renewal application onto the Asylum Service database (“Alkyoni II”) alone may take several weeks due to the backlog of cases treated by AAU Beneficiaries of International Protection. In cases of refugees deported or returning to Greece from other European countries with an expired ADET in the past year, the timeframe of registration of the renewal applications ranged from three days to one month.

Single woman deported from Germany: Mariella*, a recognised trans refugee from Iran, was deported from Germany to Greece in mid-April 2025. She requested renewal of her ADET in mid-May. Her application was registered by AAU Beneficiaries of International Protection 19 days later and is still pending to date.

Single man returned from Germany: Reza*, a recognised refugee from Afghanistan, returned from Germany in early May 2025 after his asylum application was dismissed as inadmissible due to his status in Greece. He returned to Greece with an expired **Residence Permit** and passport, while he had submitted an application for renewal of his ADET at the end of April, prior to leaving Germany. The ADET renewal application was registered by AAU Beneficiaries of International Protection 27 days later.

Delays in the processing of applications: AAU Beneficiaries of International Protection approves the renewal of the ADET with an “ADET Renewal Decision”. Prior to taking such a decision, the Asylum Service conducts a background check to assess any public order or national security grounds that would bar the renewal of the permit.³⁰ The Asylum Service carries out the background check by contacting the competent police and judicial authorities with a view to verifying whether the person has any criminal charges or convictions that would give rise to public order or national security grounds.

This step may take several months in practice,³¹ not least due to the fact that it involves “sending of paper files (copies) by post” according to the Asylum Service.³² However, there are diverging views within the Greek administration as to the reasons behind protracted delays in the ADET renewal process. As a result, the European Commission has received contradictory information from the different responsible Greek services on the matter:

- ❖ On the one hand, the Asylum Service has “explained the difference between the first issuance of ID documents and the prolongation of residence permits which can be a lengthy process due to lack of staff in the Hellenic Police and rather extensive security assessments.”³³

²⁹ Ombudsman, 316047/3924, 24 January 2023; “Ελλειψη ομοιομορφίας μεταξύ των βεβαιώσεων δικαιούχων διεθνούς προστασίας που εκδίδονται από τα κατά τόπους αρμόδια Π.Γ.Α./Α.Κ.Α. Αττικής”, 316047/65864, 2 December 2022.

³⁰ Article 23(2) Asylum Code.

³¹ Ombudsman, ‘Καθυστερήσεις πλέον του έτους στη διαδικασία ανανέωσης Α.Δ.Ε.Τ. σε υπόθεση δικαιούχου διεθνούς προστασίας’, 316047/64653/2022, 28 November 2022.

³² European Commission, Email correspondence: ‘main points discussed in JF with GAS on 21 February 2024’, Ares(2024)4013042, 21 Φεβρουαρίου 2024.

³³ European Commission, *18th Steering Committee Meeting for Migration Management*, Ares(2024)5820415, 6 June 2024, 2.

- ❖ On the other hand, the Hellenic Police has noted that “in relation to the issuance of ADET (residence permits)... there are no delays from their side and is open to a meeting with the Ministry of Migration and Asylum”.³⁴

Additional delays and obstacles to the approval of ADET renewal applications emerge in the cases of people for whom another Member State has issued an alert on the Schengen Information System (SIS) to prohibit further travel.³⁵ We have encountered such alerts in certain cases of deportation of recognised refugees from other countries, often issued for the sole reason of travelling to other states and seeking protection again. In practice, the Asylum Service suspends the ADET renewal process until the SIS alert is lifted. This requires coordination between the competent SIRENE units of the countries concerned.³⁶

Single woman deported from Germany: Mariella*, a recognised trans refugee from Iran, was deported from Germany to Greece in mid-April 2025 after she had reached several EU countries to seek protection again. She filed an application for renewal of her ADET in mid-May. The application is still pending to date, for almost one year. Upon intervention from RSA lawyers, AAU Beneficiaries of International Protection replied that the renewal of Mariella*'s ADET cannot be approved due to the existence of a SIS alert against her. No further information was given as to the reasons for the alert or efforts to lift it.

The fact that more than 2,200 ADET renewal applications are pending at AAU Beneficiaries of International Protection for more than one year is indicative of widespread delays in the ADET renewal process, as confirmed by official figures provided above.

Once the application for renewal has been examined, AAU Beneficiaries of International Protection of the Asylum Service issues an “ADET Renewal Decision”. The beneficiary of international protection receives not the decision itself but a standardised information sheet carrying their six-digit case number, the number of the ADET to be renewed and the Passport Office of the Hellenic Police where they need to refer for the next step of the process.

Second step: Hellenic Police appointment & fingerprinting

Only after the issuance of an ADET Decision or ADET Renewal Decision may beneficiaries of international protection request an appointment to submit the necessary documents to issue the permit.³⁷ This step is carried out at the territorially competent Passport Office of the Hellenic Police. The TAA is responsible for Attica and receives the majority of applications for ADET.

³⁴ European Commission, Email correspondence: ‘Flash Report – DDG Gminder, Greece 20-22 November 2023’, Ares(2023)8141654, 28 November 2023, 3.

³⁵ Article 32 Regulation (EU) 2018/1862 of the European Parliament and of the Council of 28 November 2018 on the establishment, operation and use of the Schengen Information System (SIS) in the field of police cooperation and judicial cooperation in criminal matters [2018] OJ L 312/56.

³⁶ Article 7 SIS Regulation.

³⁷ Article 5(1) ADET Regulation.

- ❖ In the case of initial ADET grants, the ADET Decision does not expressly mention the specific Passport Office of the Hellenic Police where the beneficiary must refer. It only contains a standardised reference to “His/Her referral to the Competent Service of the [Hellenic Police] for the submission of the necessary documents pursuant to Article 6 [of the ADET Regulation].”
- ❖ Conversely, as regards ADET renewals, the ADET Renewal Decision cites the specific Passport Office where the documents must be submitted. In fact, AAU Beneficiaries of International Protection states that it cannot modify the place of submission of the documents in the ADET Renewal Decision unless the person produces **Proof of Residence Address** in a place other than the one stated in the decision. This formality may amount to a serious barrier for homeless persons, especially beneficiaries of international protection deported from other countries to Greece without stable accommodation.

Single man deported from Germany: Asef*, a recognised refugee from Afghanistan, was deported from Germany to Greece in March 2025 while his ADET had expired. Before his deportation from Germany, he had applied for renewal of his ADET and his application had already been approved by the Asylum Service. When he approached the TAA in Athens to submit documents and to give fingerprints, the Hellenic Police refused to receive his application on the ground that the ADET Renewal Decision cited the Aliens Unit of Thessaloniki as the responsible service – based on the location of the camp where Asef* resided prior to departing from Greece. In April 2025, AAU Beneficiaries of International Protection requested Asef* to produce proof of residence address in Athens in order to amend the ADET Renewal Decision, even though RSA lawyers stressed that he had been deported from Germany and remained homeless in Athens. Upon a new appointment in July 2025, the TAA refused again to receive Asef*'s documents and asked that the ADET Renewal Decision be amended so as to cite Attica as the place of submission of the documents. Asef* remained without identity documents for six months after his deportation from Germany.

Beneficiaries must email the Hellenic Police to request an appointment to submit documents for the issuance of their initial or new ADET. They can request a single appointment for both ADET and **Travel Document**, if they so wish and if they meet the conditions. The appointment must be requested within six months from the adoption of the ADET Decision or ADET Renewal Decision, otherwise a new decision must be issued by the Asylum Service.

As regards people residing in Reception and Identification Service (RIS) camps in the Greek reception system, the camp administration schedules collective appointments after a set number of people has been reached. However, the RIS does not arrange free transport to the TAA. Beneficiaries are now required to cover the costs of transport from the camps to Athens on their own means, not least without having received any instalment of the financial allowance due to asylum seekers over the past year.

In a December 2024 reply, the Hellenic Police had highlighted that appointments are scheduled within approximately 10 days from the email request.³⁸ In cases supported by RSA over the past year, waiting times for appointments for submission of documents at TAA ranged from one to 33 days from the email request:

³⁸ *Ibid.*

Waiting times for TAA appointments for submission of documents in RSA cases			
	Appointment request	Appointment date	Days
Abbas* & Somaya*	11 Feb 2026	16 Mar 2026	33
Farzane*	21 Nov 2025	24 Nov 2025	3
Reza*	3 Sep 2025	5 Sep 2025	2
Asef*	13 Aug 2025	25 Aug 2025	12
Zeineb*	28 Jul 2025	18 Aug 2025	21
Fatmeh*	27 Jun 2025	2 Jul 2025	5
Zahra*	16 Jun 2025	18 Jun 2025	2
Ali*	13 Jun 2025	14 Jun 2025	1

Appointments at TAA are scheduled every day at 7am for all beneficiaries. If people are not on the premises on time, they are not allowed in and are required to book a new appointment. The Unit still offers no interpretation to facilitate contact between police authorities and the persons concerned, nor does it ensure special conditions or support for vulnerable persons.

On the day of their appointment with the Hellenic Police, the beneficiary is expected to appear in person at the Passport Office and to produce photographs, as well as a solemn declaration in Greek attesting their place of residence. Fingerprints are taken at the Passport Office upon submission of the documents.³⁹ The ADET Regulation provides that the Hellenic Police shall locate the asylum decision and ADET Decision of their own motion via the “Alkyoni” database.⁴⁰ This is still not the case for **Travel Documents**, however.

The beneficiary must also produce a valid International Protection Applicant Card (Δελτίο Αιτούντος Διεθνή Προστασία, DADP) in case of initial ADET issuance or their expired ADET in case of renewal.⁴¹ We have not witnessed recent widespread obstacles in the delivery of DADP that would affect beneficiaries in applying for ADET, as reported in previous years.⁴²

After the submission of documents and fingerprinting, the beneficiary receives a confirmation document with a bar code. The territorially competent Passport Office transmits the file to the Passport and Security Documents Directorate (Διεύθυνση Διαβατηρίων και Εγγράφων Ασφαλείας) of the Hellenic Police Headquarters (Αρχηγείο Ελληνικής Αστυνομίας), the central entity responsible for printing the ADET. Printed ADET must then be returned to the relevant Passport Office within 15 days,⁴³ to be then retrieved by an Asylum Service officer and brought to the Asylum Service.⁴⁴

³⁹ Article 7 ADET Regulation.

⁴⁰ Article 6(1) ADET Regulation.

⁴¹ *Ibid.*

⁴² RSA & Stiftung PRO ASYL, *Beneficiaries of international protection: Access to documents and socio-economic rights*, March 2024, 12, available [here](#); March 2023, 10-11, available [here](#).

⁴³ Article 7(8) ADET Regulation.

⁴⁴ Article 7(9) ADET Regulation.

There are, however, cases of ADET printed by police authorities with errors on the personal details or the legal status of beneficiaries. These cause further delays in the process.⁴⁵

Third step: Collection of ADET from the Asylum Service

Upon completion of the **Second Step**, beneficiaries wait until their ADET is ready for collection from the Asylum Service. They are not notified when their ADET is printed or when it is collected from the Hellenic Police by the Asylum Service.

Although the ADET Regulation expressly provides that the RAO or AAU which issued the ADET Decision is competent for delivering the ADET,⁴⁶ the actual collection of residence permits in the Attica region is exclusively done at RAO Attica ("Katehaki"). This arrangement has been put in place "for reasons of synergies of scale" according to the Asylum Service.⁴⁷

Waiting times from the submission of documents to the TAA until the collection of the ADET from RAO Attica in cases supported by RSA over the past year consistently exceeded one month and reached two months in some cases:

Waiting times from submission of documents to ADET collection in RSA cases			
	Submission of documents	Collection	Days
Sarah* & Sadik*	30 Jan 2026	26 Mar 2026	55
Arif*	25 Nov 2025	12 Jan 2026	48
Farzane*	24 Nov 2025	8 Jan 2026	45
Zakiya*	24 Oct 2025	4 Dec 2025	41
Asef*	25 Aug 2025	18 Sep 2025	24

The Asylum Service does not notify people individually of the date of collection of their ADET. At the end of every week, it uploads on its website a list of six-digit case numbers for which ADET are ready for collection on the indicated day. Therefore, beneficiaries have to regularly consult the weekly lists on the website of the Asylum Service until they find an entry corresponding to their individual case number. The weekly list of appointments for delivery of documents at RAO Attica and RAO Thessaloniki is uploaded on webpages titled "**Λίστες Έτοιμων Αδειών Διαμονής**". However, the same website has a separate webpage titled "**Λίστα ανανεωμένων Αδειών Διαμονής**", where appointments at RAO Attica and RAO Thessaloniki have not been uploaded since autumn 2020 but appointments at RAO Chios are listed. These lists are available only in Greek, English and French.

If people miss their appointment, the Asylum Service does not automatically reschedule an appointment for the collection of the ADET; a new appointment must be booked. Importantly, services at the Info Point of RAO Attica are informed of the date upon which documents were

⁴⁵ European Commission, *Bi-weekly update on the migratory situation in Greece (islands and mainland) 05/11/2025*, Ares(2025)9515318, 5 November 2025.

⁴⁶ Article 9 ADET Regulation.

⁴⁷ Asylum Service, 'Ανανέωση Ταυτοποιητικών Εγγράφων Δικαιούχων Διεθνούς Προστασίας', 58515/2024, 16 February 2024, 2.

delivered from the TAA but not of the exact date of scheduled delivery to their holders on the weekly lists.

In our experience, even for people represented by a lawyer, the rescheduling of missed appointments and resolution of any issues relating to the delivery of ADET require in-person presence at RAO Attica, as we have never been able to process such requests with that Office via phone or email.

In February 2024, the Asylum Service had indicated that it was “Reviewing the possibility to improve presentation and search of information on ADET and TDV ready for delivery, as well as other means for the rescheduling of missed appointments in cooperation with competent services of the Ministry”.⁴⁸ At that time, it had also informed the European Commission that it “is looking into other options than the existing one (publishing weekly lists/ announcements) as some applicants miss/ overlook their appointment.”⁴⁹ Two years later, the process for ADET collection from the Asylum Service remains intact.

Replacement of lost documents

In the event of loss or theft of the ADET or the **Travel Document**, the beneficiary must make a report to the Hellenic Police and submit a copy of the loss or theft declaration to the RAO or AAU that granted international protection, together with a request for a new ADET.⁵⁰ Whereas Greek law provides that the ADET shall be automatically cancelled upon a loss or theft declaration,⁵¹ in practice the Asylum Service requires the lapse of a two-month period following the loss or theft declaration before issuing a new ADET Decision. The duration of validity of the new residence permit corresponds to that of the lost or stolen permit.⁵²

Retrieval of documents withheld by another Member State

Acute problems arise in the case of beneficiaries of international protection who request asylum in another EU Member State or Schengen Associated State, submit their Greek ADET and **Travel Document** to the authorities of that state, and are returned to Greece without being given back their documents. These cases demonstrate the absence of a clear and uniform practice for the retrieval of documents at the level of involved Greek authorities, namely the Asylum Service, the Hellenic Police and Greek consulates. Confusion arises even as to the allocation of responsibilities between different offices of the Asylum Service on the handling of these cases.

As a result, people deported back to Greece end up undocumented for several months, without adequate **Information** on the procedure they need to follow to retrieve their documents. At times,

⁴⁸ *Ibid*, 3.

⁴⁹ European Commission, Email correspondence: ‘main points discussed in JF with GAS on 21 February 2024’, Ares(2024)4013042, 21 February 2024.

⁵⁰ Article 11(1) ADET Regulation.

⁵¹ Article 11(2) ADET Regulation.

⁵² Article 11(1) ADET Regulation.

they are even advised by the authorities to – falsely – report loss of the identity documents withheld by the authorities of another country in order to issue new ones.⁵³

Single man deported from Germany: Ahmed*, a recognised refugee from Afghanistan, was deported from Germany at the end of December 2025 without being given back his valid ADET and travel document. RSA lawyers have been in contact with RAO Piraeus since mid-January 2026 and have requested the retrieval of the documents from Germany and their return to Ahmed*. In mid-March 2026, RAO Piraeus informed RSA lawyers that Ahmed*'s documents have not reached the Hellenic Police Headquarters and asked Ahmed* to submit a declaration of loss of the documents before a police authority in order for the Asylum Service to issue new ones. The ADET and TDV have not been lost, however. Ahmed*'s lawyer in Germany has also filed a request for their retrieval.

Similar cases of beneficiaries of international protection returned to Greece from other countries and represented by RSA are variably handled by the Asylum Service. In some cases, the Asylum Service communicates directly with the responsible consular authority to arrange the retrieval of the document, while in others it requests the document holder to communicate directly with the other state's authorities in order for the document to be sent to the consulate responsible.

In addition, in certain cases of withheld documents of deported persons, the Asylum Service states that withheld documents shall be cancelled upon return to Greece, while in others it transmits the documents to the beneficiary.

Beneficiaries of international protection are not able to navigate this administrative maze and to locate the necessary steps to retrieve their documents without assistance from a lawyer.

⁵³ Information provided by Meraki Humanitarian Support, 20 March 2026.

Single man deported from Germany: Hamid*, a recognised refugee from Afghanistan, was deported from Germany at the end of September 2025 without being given back his valid ADET and travel document from the German authorities. It took three months and multiple interventions before three different Greek authorities for him to retrieve his documents:

- | | |
|-------------|--|
| 30 Sep 2025 | Hamid* is deported from Germany to Greece. At the airport, the Hellenic Police gives him the German authorities' <i>laissez-passer</i> but his ADET and travel document have been withheld by Germany. Hamid* leaves the airport and arrives in central Athens, homeless. |
| 6 Oct 2025 | RSA lawyers approach RAO Piraeus and request the Asylum Service to contact the responsible consulate in Germany to arrange the transfer of the documents to Greece and their return to their holder. |
| 21 Oct 2025 | RAO Piraeus invokes an "instruction on cancellation of withheld documents" by the Directorate-General of the Ministry of Migration and Asylum, according to which documents withheld by the authorities of another country are automatically transferred and then cancelled by the Asylum Service. |
| 21 Oct 2025 | RSA lawyers request the instructions in question. The request is transmitted to the Procedures and Training Unit of the Asylum Service. |
| 13 Nov 2025 | Hamid*'s lawyer in Germany informs RSA that the original documents have already been sent by the German authorities to the Hellenic Police Headquarters. RSA lawyers inform RAO Piraeus and request information on how to retrieve them. |
| 14 Nov 2025 | RAO Piraeus states that it has no contact with police authorities and that relevant communication is handled by AAU Nikaia of the Asylum Service. RSA lawyers forward the request to AKA Nikaia. |
| 18 Nov 2025 | AKA Nikaia replies that it is not involved in the process and refers back to RAO Piraeus. |
| 25 Nov 2025 | Following a fresh reminder from RSA, RAO Piraeus replies that the retrieval of the documents is still pending. Same for the response of the Legal Support Directorate of the Ministry of Migration and Asylum regarding the instructions on withheld documents. RSA lawyers recall that the documents have already reached the Hellenic Police Headquarters. |
| 17 Dec 2025 | RSA lawyers ask the Hellenic Police Headquarters in person whether the documents have been transmitted to the Asylum Service. They are informed that a file has been sent by post. |
| 29 Dec 2025 | RAO Piraeus informs RSA lawyers that the documents have reached the service. Hamid* retrieves them in person. The instructions on withheld documents were never made available. |

Impossible exercise of rights without possession of an active ADET

The previous sections have demonstrated for yet another year the wide range of systemic deficiencies in various stages of the process for issuance, renewal and retrieval of ADET, most notably the protracted delays in the processing of ADET renewal applications at AAU Beneficiaries of International Protection of the Asylum Service. These issues are constantly stressed by Greek

independent authorities⁵⁴ and EU institutions and agencies, and are conceded by the Asylum Service.⁵⁵

Our experience of representation of cases of recognised refugees and in particular returnees from other countries in recent years still confirms disproportionately long waiting times in the ADET renewal process, reaching or even exceeding one year from the submission of the application to the collection of the new ADET. Our observations are corroborated by official data of the Asylum Service, pointing to more than 2,200 ADET renewal applications pending at AAU Beneficiaries of International Protection for over a year.

Throughout this protracted period, beneficiaries are not regularly informed by the Asylum Service on the state of play of their renewal application, nor are their requests for information effectively replied, as discussed in detail in the **Information & Assistance** section.

Until they obtain their first ADET, beneficiaries retain their DADP and may renew it at the competent RAO or AAU that granted them asylum if it has expired.⁵⁶ This does not apply to renewal of an expired ADET, however, in which case persons receive no documentation upon submission of the application and until the delivery of the new ADET and have no means to demonstrate their status and to access the rights attached to the residence permit.

'Dead letter' certificates of asylum status

As mentioned above, Greek law now expressly provides that the service receiving the ADET renewal application shall grant a "certificate of submission".⁵⁷ At the time of writing, however, AAU Beneficiaries of International Protection does not issue such a certificate upon submission of the ADET renewal application, nor does it confirm receipt of the application – even automatically.

⁵⁴ Ombudsman, 'Υπενθύμιση αναπάντητου εγγράφου', 355384/54532, 29 October 2024; 'Αδυναμία πρόσβασης δικαιούχων διεθνούς προστασίας στα δικαιώματα τους βάσει των ισχυουσών βεβαιώσεων-Διαδικασία απενεργοποίησης Α.Μ.Κ.Α. σε περίπτωση υποβληθέντος αιτήματος ανανέωσης Α.Δ.Ε.Τ. δικαιούχων διεθνούς προστασίας', 355834/316047/39669/2024, 8 August 2024; 'Καθυστερήσεις πλέον του έτους στη διαδικασία ανανέωσης Α.Δ.Ε.Τ. σε υπόθεση δικαιούχου διεθνούς προστασίας', 316047/64653/2022, 28 November 2022; Greek National Commission for Human Rights, 'Επιστολή της ΕΕΔΑ προς τα συναρμόδια Υπουργεία για το θέμα της ανανέωσης των αδειών διαμονής δικαιούχων διεθνούς προστασίας', 27 June 2021, available [here](#).

⁵⁵ European Commission, Email correspondence: 'meeting with the GAS on 27 January', Ares(2025)4795018, 28 January 2025; Email correspondence: 'Meeting with GAS on 13 November', Ares(2025)4503310, 13 November 2024; Email correspondence: 'Mission Report – Acting Director-General Beate Gminder to Greece – 15-16 July 2024', Ares(2024)6952325, 26 July 2024, 3; Letter to the Minister of State, Ares(2023)8268343, 4 December 2023, 10; *Operational conclusions – 12th Steering Committee meeting for migration management*, Ares(2023)3222469, 25 April 2023; *Task Force Migration Management Mission Report – Athens/Lesvos/Evros – July 2022*, Ares(2022)5049125; Letter to Civil Society Organisations, Ares(2021)8048555, 7 December 2021, available [here](#); EUAA, *Residence permits and travel documents for third-country nationals in the context of asylum*, EUAA/2023/23, November 2023, available [here](#).

⁵⁶ However, DADP do not indicate the grant of international protection.

⁵⁷ Article 23(1) Asylum Code, as amended by Article 31 L 5226/2025. For its part, Article 13 ADET Regulation states that "Upon request... the competent ADET grant Service shall issue a certificate of submission of application and necessary documentation for the grant of ADET."

The Asylum Service instead issues a “certificate of asylum status” only upon request of the person concerned to the RAO or AAU that issued the initial ADET Decision – not AAU Beneficiaries of International Protection receiving the ADET renewal application.

Even following the September 2025 reform, the “certificate of asylum status” (βεβαίωση δικαιούχου καθεστώτος) still does not guarantee refugees uninterrupted access to their rights while they wait to renew their permit – or to retrieve a permit withheld by another country. The certificate is no substitute for the ADET in practice.

First, the Asylum Service does not issue a certificate before the renewal application has been registered and uploaded on the “Alkyoni II” database. This may take several weeks from the submission of the application, as discussed in the **First Step** of the process.

Second, while the certificates issued by the RAO and AAU of the Asylum Service now seem to carry uniform format (e.g. reference number of the ADET renewal application, validity for six months), they are still not accepted by the majority of public authorities and services as proof of asylum status.⁵⁸ The certificate is never accepted where the person does not hold their original expired ADET, even when accompanied by a certificate of loss of the original ADET.⁵⁹

There are also instances of authorities such as EFKA Local Directorates which conflate the certificates issued by the Asylum Service to beneficiaries of international protection to the certificates – equipped with a photograph – issued by Aliens and Migration Directorates of Regional Authorities to immigration residence permits and request the latter from refugees.⁶⁰

We recall that the Asylum Service had referred in February 2024 to an impending legislative reform aimed at establishing specific standards for certificates to ensure that personal data and authenticity of the documents can be verified, in line with standards set out in the Migration Code,⁶¹ and that documents are accepted by third parties.⁶² No such measure has been taken by the Greek authorities in that direction, two years later.

Impossibility of certification of signature

Beyond precluding access to socio-economic rights, the above deficiencies even hinder recognised refugees' ability to certify their signature before a public authority in line with the requirements of the Administrative Procedure Code.⁶³ This formality is necessary for a series of actions e.g. making a solemn declaration for the submission of a **Travel Document** renewal

⁵⁸ Information provided by SolidarityNow, 24 March 2026. Acceptance of the certificate is described as extremely limited and piecemeal, for instance before Migrant Integration Centres (KEM) or homeless shelters. EFKA, DYPA and municipal nurseries are listed among services that do not accept certificates.

⁵⁹ Information provided by Meraki Humanitarian Support, 20 March 2026. Cases of acceptance of certificates by services such as DYPA, AADE or EFKA solely concern persons who held their expired ADET, in some cases only upon intervention of a social worker.

⁶⁰ *Ibid.*

⁶¹ L 5038/2023, Gov. Gazette A' 81/01.04.2023.

⁶² Asylum Service, 'Ανανέωση Ταυτοποιητικών Εγγράφων Δικαιούχων Διεθνούς Προστασίας', 58515/2024, 16 February 2024, 2-3.

⁶³ Article 11(1) Administrative Procedure Code.

application or authorising a legal representative. Services, including the Asylum Service, require authorisations to a lawyer to be certified by a public authority. Therefore, the barriers in question also hamper the right to legal representation.

Single man deported from Germany: Ahmed*, a recognised refugee from Afghanistan, was deported from Germany at the end of December 2025 without being given back his valid ADET and travel document by the German authorities. In early February 2026, he received a "certificate of asylum status" from RAO Piraeus, which provides that his identity documents have been withheld by Germany and that he awaits their return, as per his declaration. RSA lawyers submitted a request to AADE for **TAXISnet Credentials** on his behalf. When AADE asked for an authorisation certified by a public authority, they explained that Ahmed* cannot certify his signature before a public service since he is awaiting the retrieval of his withheld ADET, and produced the certificate issued by RAO Piraeus. AADE rejected the TAXISnet credentials application, insisting that an authorisation certified by a public authority is required. Ahmed*'s application for credentials was accepted only after his lawyers submitted an authorisation certified by RAO Piraeus.

The same obstacles have arisen even before certain Asylum Service offices such as AAU Beneficiaries of International Protection, the unit responsible for ADET renewals and reasonably expected to be familiar with the chronic delays in renewal procedures handled by its officers.

Single-parent family deported from Germany: Nilab* is a single mother from Afghanistan with four children. She suffers from a serious disability, certified in Germany. The single-parent family was deported to Greece at the end of January 2026, after seven years of stay in Germany. All ADET and travel documents of the family had expired and most had been lost by then. Despite RSA interventions before different entities to request emergency shelter for the family, their requests for accommodation were unsuccessful due to the absence of available housing. In early February, the family filed a request for renewal of their expired ADET via their RSA lawyers, who were asked by AAU Beneficiaries of International Protection to produce an authorisation carrying a certification of Nilab*'s signature by a public authority.

In mid-February 2026, Nilab* attended together with her lawyer a scheduled appointment at AAU Beneficiaries of International Protection to certify her signature on the authorisation to RSA lawyers and to sign a solemn declaration needed for her to apply for renewal of the family's travel documents. However, the AAU refused to certify her signature, stating that it was impossible to verify Nilab*'s identity based on the Asylum Service records or through fingerprinting. RSA lawyers asked to be notified in writing of the reasons for which the Asylum Service refuses to certify Nilab*'s signature. In early March, the AAU replied that Nilab* would have to report the loss of her expired ADET. As for the verification of her identity, the AAU stated: "you will have to refer to the Regional Asylum Office of Attica, where registrations and fingerprinting are carried out on Mondays, Tuesdays and Wednesdays". RAO Attica shares the same building as AAU Beneficiaries of International Protection in "Katehaki". Yet, on the day of Nilab*'s appointment, the Asylum Service refused to identify her via fingerprinting. RSA has lodged a complaint to the Greek Ombudsman on this case. In mid-March, RAO Piraeus certified Nilab*'s signature.

Beneficiaries of international protection cannot certify their signature before KEP without a valid ADET, even if they possess a valid **Travel Document**.

The Greek authorities have yet to deliver the necessary reforms to address the aforementioned systemic deficiencies, two years after their assurances to that effect.

Finally, according to the Asylum Code, the start of validity of the ADET corresponds not to the date of actual delivery of the (new) permit but to the date of adoption of the ADET Decision by the Asylum Service in the case of initial permits and to the date of expiry of the previous permit in the case of renewals.⁶⁴ This creates a serious risk especially for subsidiary protection holders whose ADET are valid for one year,⁶⁵ given that they are handed ADET near expiry or already expired and in need of immediate renewal in view of the delays described above.

Travel document (TDV)

The travel document (*titre de voyage*, TDV) is a prerequisite for certain procedures such as the application for an **AFM** or the opening of a **Bank Account** in practice, given that some banks continue not to accept ADET as identity documentation and to request passports from beneficiaries of international protection who wish to open an account.

Such practices are equally encountered in public services such as EFKA Local Services which also request a valid travel document for actions such as η **AMKA Activation**, even though this is not a requirement under relevant legislation.

TDV issuance

Beneficiaries of international protection may submit documents and fingerprints to apply for the issuance of travel documents to the Passport Offices of the Hellenic Police,⁶⁶ after requesting an appointment with the territorially competent office, similar to the process described in the **Second Step** of the ADET issuance. The asylum decision alone suffices for such an application, though an additional condition for requesting an appointment for travel documents is the payment of a fee of 84.40 € for adults and 73.60 € for children up to the age of 14. Travel documents printed by the TAA are exclusively collected at RAO Attica, similar to the **Third Step** of the ADET collection described above.

According to the Refugee Convention, the Qualification Directive and prospective Qualification Regulation, and the Asylum Code, refugee status holders are entitled to travel documents except where “compelling reasons of national security or public order” arise.⁶⁷ Similar conditions apply under EU law to the grant of a **Residence Permit** to beneficiaries of international protection.⁶⁸ However, the TDV Regulation, adopted based on Article 24 of the Asylum Code, prohibits the grant of travel documents to any person who “a) has been convicted by final decision for forgery, forgery of certificates, embezzlement of documents, false deposition without oath or false declaration (articles 216, 217, 222 and 225 of the Criminal Code and article 22(6) L 1599/1986) where commission is related to the issuance, use, loss or theft of a passport, an identification

⁶⁴ Article 23(1) Asylum Code. However, the Ministry of Migration and Asylum Circular 68883/2023 states that the provision only concerns the first renewal.

⁶⁵ Article 23(1) Asylum Code.

⁶⁶ Article 3 TDV Regulation, JMD 10302/2020, Gov. Gazette B' 2036/30.05.2020.

⁶⁷ Article 28(1) Refugee Convention; Article 25(1) Qualification Directive; Article 25(1) Qualification Regulation; Article 24(1) Asylum Code.

⁶⁸ Article 24(1) Qualification Directive.

document or any other document that may be used as a travel document or for criminal organisation, terrorist acts, abduction, slave trade, trafficking in human beings, child abduction, involuntary kidnapping, trafficking (articles 187, 187A, 322, 323, 323A, 324, 327, 351 of the Criminal Code) as well as the offences of Article 29(5), (6) and (7) and of Article 30(1) and (2) of L 4251/2014. The prohibition shall apply from the final convicting judgment for five years (5) as regards commission of the above misdemeanours and for ten (10) years as regards commission of a felony respectively, on condition that the sentence imposed has been commuted; b) has been the subject of a criminal charge for a felony or an offence of point (a) for the duration of proceedings...”⁶⁹

Decisions of RAO and AAU refusing the grant of a travel document may be appealed before the Director of the Asylum Service who takes a decision based on a recommendation of a three-member panel.⁷⁰

The Council of State ruled in July 2024 that Article 1(2) of the TDV Regulation breaches Article 25 of the Qualification Directive and the corollary provision of Article 24 of the Asylum Code insofar as it sets out a blanket prohibition on granting travel document to refugees charged with or convicted of any of the listed offences without prior establishment of compelling reasons of national security or public order.⁷¹ The provision, however, remains intact at the time of writing.

As a result of the aforementioned provision, travel documents may be denied to refugees who have been charged or convicted with a suspended sentence for misdemeanours such as use of false travel documents, without “compelling reasons of national security or public order” being established in the individual case and while the very same refugees have received ADET from Greece. The Greek authorities state that the Legal Support Directorate of the Ministry of Migration and Asylum has issued an internal circular to RAO Attica, Thessaloniki and Crete following the Council of State ruling to offer instructions on the assessment of national security or public order grounds conducted by the Asylum Service parallel to the checks performed by the Hellenic Police.⁷² The circular remains unpublished to date.

TDV renewal

Modalities and necessary formalities

Beneficiaries of international protection wishing to renew their travel document must submit an application form and a digital photograph to the gas.traveldoc@migration.gov.gr email address of AAU Beneficiaries of International Protection.⁷³ They are also required to submit a solemn declaration attesting that they have not committed any of the criminal offences listed in Article

⁶⁹ Article 1(2) TDV Regulation.

⁷⁰ Article 4(3) TDV Regulation.

⁷¹ Council of State, 1107/2024, 12 July 2024, para 13. See also Administrative Court of Athens, AΔ1550/2023, 22 December 2023, para 9.

⁷² European Commission, Email correspondence: ‘Meeting with GAS on 13 November’, Ares(2025)4503310, 13 November 2024.

⁷³ Article 7(2) TDV Regulation.

1(2) of the TDV Regulation,⁷⁴ even though these cases too are subject to a background check by the Asylum Service. Parents of minor children must also fill a separate solemn declaration of consent to the renewal of the TDV of their children.

These solemn declarations must carry a signature certified by a public authority. This requirement precludes the possibility to request TDV renewal for people who do not hold a valid ADET, namely pending renewal or retrieval from another country. The inability to apply for TDV renewal is therefore an example of **Impossible Exercise of Rights without an Active ADET**.

Solemn declarations on the submission of a TDV renewal application must reach AAU Beneficiaries of International Protection either by post or in person. People encounter barriers and delays already at the stage of delivery of the solemn declaration, as seen in recent cases supported by RSA.

Single man returning from Germany: Reza*, a recognised refugee from Afghanistan, returned from Germany in early May 2025 after his asylum application was rejected as inadmissible due to his status in Greece. He returned to Greece with an expired **Residence Permit** and passport and had already filed an ADET renewal application prior to departing from Germany.

In mid-October 2025, one month after the approval of his ADET renewal, Reza* submitted a TDV renewal application. When he arrived in person at the Asylum Service ("Katehaki") to submit his solemn declaration that he has not been convicted of a criminal offence, security personnel refused him entry and referred him to RAO Piraeus as the office responsible for Afghan refugees. Reza* was only allowed to enter and to submit his solemn declaration following intervention from RSA lawyers.

RSA lawyers repeatedly requested to be informed of the reference number given to Reza*'s TDV renewal application. In mid-November 2025, AAU Beneficiaries of International Protection replied that a solemn declaration on non-conviction of a criminal offence is still pending. RSA had to intervene again for the Asylum Service to confirm that it had in fact received the declaration and to register the application. Reza*'s TDV renewal application is still pending to date.

Chronic delays in handling of TDV renewal applications

This process too is marred by protracted delays in the processing of applications that appear to exceed one year. According to official Greek figures, the number of TDV renewal applications pending at AAU Beneficiaries of International Protection of the Asylum Service was 1,515 at the end of 2025, compared to 909 at the end of 2024. No TDV renewal applications were pending before the Hellenic Police:

⁷⁴ Article 7(3) TDV Regulation.



Source: Ministry of Migration and Asylum, Reply to parliamentary question, 6 Feb 2026, [here](#)

These processing times are due to delays occurring throughout the various stages of the process of renewal of TDV. For instance, the mere assignment of the case to an officer of AAU Beneficiaries of International Protection may exceed three months from the submission of the application and delivery of the solemn declaration of non-conviction of a criminal offence to the Asylum Service. For its part, the background check aimed at verifying potential criminal charges or convictions against the beneficiary may take several months, even regarding people who have just undergone a fresh background check upon recent renewal of the **Residence Permit**.

Throughout the process, people have **Restricted Access to the Authorities** for the purpose of obtaining information on the state of play of processing of their application. These obstacles also apply to refugees returned to Greece from other European countries.

Single man deported from Germany: Asef*, a recognised refugee from Afghanistan, was deported from Germany to Greece with an expired **Residence Permit** and passport. Asef* had already submitted a TDV renewal application to the gas.traveldoc@migration.gov.gr email address and had sent a reminder in March 2025 to inquire into the status of his application. No earlier than August 2025 did he receive a response from AAU Beneficiaries of International Protection, informing him that he needed to submit a solemn declaration that he had not been convicted of a criminal offence. Asef* sent the solemn declaration by post delivered to AAU Beneficiaries of International Protection in mid-October 2025. In mid-January 2026, RSA lawyers requested an update on the state of play of Asef*'s TDV renewal application. The Asylum Service stated that "the initial verification of documents has been conducted and the assignment to an officer for the continuation of processing is pending". Upon further request for information from RSA lawyers in early March, the Asylum Service replied that the application is still being processed. The examination of the application was only concluded in mid-April 2026.

Single man returning from Germany: Reza*, a recognised refugee from Afghanistan, returned from Germany in early May 2025 with an expired **Residence Permit** and passport. As stated above, one month after the renewal of his ADET was approved, he submitted a TDV renewal application in which he expressly stated that a background check had recently been performed in his case. Nevertheless, his application is still pending to date.

Tax and financial documents

Proof of residence address

Numerous administrative processes in Greece require proof of a residence address in the country. These include the issuance of **AFM** by AADE, **AMKA Activation**, registration of personal details in the **National Communications Registry**, the opening of a **Bank Account** and so forth.

Proof of residence address in Greece may be attested by a deed of property or a rental contract in the name of the individual, declared to AADE and uploaded online on its website. This process requires an **AFM** and **TAXISnet Credentials**. Proof of residence address may also take the form of a solemn declaration of accommodation by a private individual, accompanied by proof of the host's deed of property or rental contract in AADE records. However, certain public services, including some EFKA Local Services in Attica, do not accept the solemn declaration of accommodation as valid proof of residence address.⁷⁵

We stress in this regard that Greek law imposes financial penalties against any person failing to submit or submitting an incorrect declaration of rental of property.⁷⁶ In addition, knowing disclosure of false information or concealment of the truth when reporting to any authority is a criminal offence punishable by term of imprisonment under Greek law.⁷⁷

Homeless recognised refugees are unable to produce any of the above forms of proof of residence address. The only option for these people is to request a homelessness certificate from the services of the municipality within which they are present. This process remains extremely onerous in practice, however. In Athens, for example, a homelessness certificate is issued only to people who sleep rough on the streets, are located upon on-site missions of the Street Work Team of the Reception and Solidarity Centre of the Municipality of Athens (*Πολυδύναμο Κέντρο Υποδοχής και Αλληλεγγύης του Δήμου Αθηναίων*, KYADA) and are registered on its registry of homeless persons. This therefore excludes homeless people who have not been spotted on the streets by the Street Work Team or people who live or informally move between spaces or homes of private individuals in extremely precarious conditions of informal rental to avoid the streets or who frequently change location together with their belongings for protection and safety reasons.

In addition, KYADA issues a homelessness certificate only when requested for an explicit and specific purpose e.g. application for social benefits such as **Ελάχιστο Guaranteed Minimum Income** and so long as the remaining conditions are fulfilled, namely possession of a valid **Residence Permit** and **AFM** and **TAXISnet Credentials**. KYADA has no interpretation services so communication with non-Greek or English speakers is not possible.

Many homeless refugees, especially those returned to Greece from other countries, are therefore unable to obtain even a homelessness certificate to prove their residence in order to complete a series of procedures and to obtain essential documents.

⁷⁵ Information provided by SolidarityNow, 24 March 2026.

⁷⁶ Article 5 AADE Decision ΠΟΛ1662/2018, Gov. Gazette B' 3579/22.08.2018.

⁷⁷ Article 224(4) Criminal Code, L 4619/2019, Gov. Gazette A' 95/11.06.2019.

Tax Identification Number (AFM)

The Tax Identification Number (*Αριθμός Φορολογικού Μητρώου*, AFM) is a single, mandatory number for transactions with the Greek state and in particular for opening a **Bank Account**, for submission of a tax declaration and receipt of a **Tax Clearance Certificate**, for rental of property, for **AMKA** issuance and for access to **Employment** and **Social Welfare**.⁷⁸

Initial AFM issuance

Pursuant to an AADE Decision, asylum seekers completing the lodging of their asylum application automatically receive AFM upon the delivery of the DADP.⁷⁹ Asylum registration authorities complete the AFM issuance procedure online and issue an AFM certificate (*Βεβαίωση Απόδοσης ΑΦΜ*) to the applicants,⁸⁰ which indicates the DADP as identification document.

People who have not received AFM as asylum seekers and have already obtained an ADET do not come under this procedure. They are instead referred by the Asylum Service to AADE. In such cases, an online application for AFM must be submitted via the AADE platform,⁸¹ available only in Greek. To submit their application, an individual must declare two categories of documents: a valid identification document – the platform only accepts **Travel Documents** as such, not ADET – and a valid **Residence Permit**. The application for AFM also requires **Proof of Residence Address** and an exact address in Greece. The platform does not allow the individual to declare themselves homeless without an address. Therefore, homeless persons who lack proof of residence address cannot issue AFM if they have not already obtained it.

Following the submission of the online application, people who request AFM have to undergo identification by AADE either in person or by videoconference. However, difficulties emerge at the identification stage in practice:

Single man deported from Germany: Farid*, a recognised refugee from Afghanistan, received status in Greece in 2022 and was returned by Germany in February 2026 without being given back his expired **Residence Permit** and his valid **Travel Document**. He has since remained homeless. Farid* had not received AFM from the Asylum Service and had not issued AFM prior to leaving Greece. In mid-March 2026, he submitted an application via the AADE platform, where he introduced his TDV under "identification document" and his ADET under "residence permit". When he showed up at his appointment, AADE refused to issue him AFM and advised him to submit a new application where the ADET would be introduced as an identification document, not the TDV. An RSA representative accompanying Farid* explained that the platform does not offer such a possibility. Farid* also submitted an application for AFM in person, however AADE refused to receive and register it. RSA lawyers sent an application to AADE via email which was ultimately registered. However, AADE refused to grant AFM to Farid*, stating that the certificate of asylum status issued to him by RAO Piraeus does not suffice as identity documentation for him to obtain AFM.

⁷⁸ Article 2 AADE Decision A1181/2025, Gov. Gazette B' 6814/17.12.2025.

⁷⁹ Articles 1(3) and 8 AADE Decision A1270/2020, Gov. Gazette B' 5508/14.12.2020.

⁸⁰ Article 2(1) AADE Decision A1270/2020.

⁸¹ Article 4(1) AADE Decision A1181/2025.

Similar problems are encountered by people who have previously obtained AFM directly from AADE – not the Asylum Service – and are trying to retrieve their number.

Single-parent family deported from Germany: Nilab*, a disabled single mother from Afghanistan, was deported together with her four children to Greece at the end of January 2026 after seven years of stay in Germany. The family had no valid **Residence Permits** and **Travel Documents** and had lost the AFM and **AMKA** they had issued before leaving Greece. In March 2026, RSA lawyers approached a KEP to retrieve Nilab*'s AFM and AMKA, but the KEP was not able to locate her data. The lawyers had to contact IDIKA to request a copy of Nilab*'s AMKA certificate from the authority's records.

According to Greek law, AFM shall be deactivated in case of declaration of inaccurate or false information.⁸²

Update of personal details in AADE records

Persons who have automatically received AFM upon lodging their asylum application must update their details in the AADE records following the grant of international protection and of a **Residence Permit** to replace the DADP with the issued ADET on the identity document entry. Conversely, in case of renewal of the residence permit, they must update their AADE records to replace the old ADET number with the new ADET number.

The process of updating personal details is not automatically carried out by the authorities as far as recognised refugees are concerned.⁸³ On the contrary, refugees must initiate the process themselves by submitting a request to AADE for update of their personal details, with a view to registering the details of their current ADET in AADE records.

This application is submitted online on the **myAADE** platform managed by AADE. It therefore requires **TAXISnet Credentials**, which cannot be obtained by a beneficiary of international protection unless they have already updated their details in the AADE records. The process is a 'catch 22': credentials are needed to request an update of personal details, which is in turn required to obtain credentials. In practice, people who do not already have credentials cannot complete the procedure unless they are assisted by an authorised third party such as an accountant or lawyer, upon condition that their signature on the authorisation is certified by a public authority. In addition, the **myAADE** platform is only available in Greek.

The update of personal details in the AADE records cannot be done without a valid ADET. In fact, where the beneficiary requesting update of their details does not produce copies of both identification documents, i.e. the old and new document, AADE contacts the Asylum Service to request confirmation of the beneficiary's details. The RAO and AAU of the Asylum Service do not

⁸² Article 7(2) AADE Decision A1181/2025.

⁸³ As opposed to automatic transmission to AADE records of changes to Greek identity cards: AADE, 'Σύνδεση φορολογικού μητρώου με Υπουργείο Εσωτερικών και Ελληνική Αστυνομία', 7 May 2019, available [here](#).

always respond to those requests. Furthermore, AADE at times requests submission of a completed **D210 Form** for update of personal details. The document is only available in Greek.

We note that beneficiaries of international protection do not receive adequate **Information** from the Asylum Service on the need to carry out this process when they are granted international protection, nor when they receive their initial ADET.

In case a person's personal details are erroneously registered in AADE records with the initial issuance of AFM upon the lodging of the asylum application, details such as civil status cannot be corrected unless the person submits a certified official document.

Single man deported from Germany: Deng*, a subsidiary protection holder from South Sudan, was deported from Germany in July 2025. In February 2026, he was assisted by RSA lawyers with a request to AADE to update his identification document details and to correct his initially registered personal details in AADE records, namely his registered nationality (Sudan instead of South Sudan) and his civil status (unmarried instead of married with five children). To substantiate his request, he produced his asylum application registration form containing the correct details. The request was initially rejected by AADE on the ground that Deng* had not attached a filled D210 form. After Deng* made a new request through his lawyers, AADE responded in mid-March, stating that Deng*'s nationality was correctly registered as "South Sudan", albeit appearing as "Sudan", and that the correction of his civil status requires a certified copy of the marriage certificate from his home country of origin, accompanied by an Apostille stamp pursuant to the 1961 Hague Convention and an official translation. South Sudan has not acceded to the Hague Convention.

TAXISnet credentials

TAXISnet credentials are needed for transactions with AADE and other public services for essential procedures such as submission of a tax declaration, activation of an unlimited public transport card and others.

Credentials are requested via online application on the kleidarithmos.gov.gr website of AADE, available in Greek and English. To receive their credentials immediately after submitting the application, the individual needs to introduce and confirm an email address, a mobile phone number and an IBAN of a Greek **Bank Account**. If any of the above documents is not available, the person must request their credentials by booking an appointment with the competent AADE service or through an authorised third party that has TAXISnet credentials of their own. The person must then request activation of their credentials via the AADE platform, available only in Greek.

Beneficiaries of international protection who have automatically received AFM upon lodging their asylum application and who have obtained international protection and a **Residence Permit** in the meantime cannot issue TAXISnet credentials unless they have previously updated their identification document details in the AADE records. As discussed in the **AFM** section above, this process is carried out via TAXISnet and people who do not already hold credentials must necessarily perform it through an authorised third party such as an accountant or a lawyer.

As indicated in the section on **Impossible Exercise of Rights without an Active ADET**, AADE only services requests by authorised third parties e.g. lawyers if the authorisation carries a signature certified by a public authority, even in the case of people who await the renewal of retrieval of their ADET.

National Communications Registry (EMEP)

Registration of a mobile phone number, an email address and a **Residence Address** on the National Communications Registry (*Εθνικό Μητρώο Επικοινωνίας*, EMEP) is a prerequisite for a number of transactions with the Greek state, including the submission of applications for disability certification and receipt of related **Social Benefits**.

The process of registration of contact details on EMEP requires verification of the phone number, done either via e-banking credentials of a **Bank Account** or in person before a KEP.

Identification of the person requires an identity document, notably a valid **Residence Permit**. However, a KEP in Attica informed RSA in mid-March 2026 that the EMEP information system does not include ADET as a valid category of identity documents for the purposes of identification of people requesting registration of contact details. Other KEP have completed the process with active ADET.

Any discrepancies between the contact details registered on EMEP and those registered in EFKA records lead to blockage in procedures such as applications for disability certification due to error alerts at the stage of the person's identification.

Bank account

The Greek government concedes in its dialogue with the European Commission that "it is well aware of the structural problems and the difficulties banks face" in relation to beneficiaries of international protection.⁸⁴ Examples of deficiencies and obstacles faced by refugees in their engagement with banks include the following:

- ❖ Requirement of a specific purpose for the opening of a bank account, potentially leading to a 'catch 22'. For example, one bank requires refugees who seek to open an account for social benefits to produce the application for **Guaranteed Minimum Income**. This application, however, cannot be submitted without an IBAN of a Greek bank account.
- ❖ Refusal to accept homelessness certificates as **Proof of Residence Address** for the purpose of opening a bank account. In other cases, banks impose additional conditions relating to the duration and frequency of renewal of the homelessness certificate.⁸⁵

⁸⁴ European Commission, *16th Steering Committee Meeting for Migration Management*, Ares(2024)7532741, 22 March 2024, 5.

⁸⁵ Information provided by SolidarityNow, 24 March 2026.

- ❖ Refusal to accept the “certificate of asylum status” issued by the Asylum Service as identity documentation instead of the **Residence Permit** for the purpose of opening a bank account or updating client data.
- ❖ Refusal on the part of certain banks to accept a person's solemn declaration that they are not under duty to submit a tax declaration, instead of a **Tax Clearance Certificate**.⁸⁶
- ❖ Refusal on the part of certain banks to grant e-banking credentials to beneficiaries of international protection. Due to this, they can only access services through their bank card.
- ❖ Refusal on the part of certain banks to service refugees except in specific branches.⁸⁷

Meanwhile, practice continues to vary from one bank to another as regards the documentation required for opening a bank account or the process of requesting an account.⁸⁸

Tax clearance certificate

The tax clearance certificate is issued upon submission of the tax declaration. Taxes are usually declared no earlier than three to four months following the end of the reference fiscal year, per established AADE practice. Accordingly, this document cannot be granted to a person as soon as they obtain international protection. The tax clearance certificate is a prerequisite for opening a **Bank Account** and for applying for **Social Benefits**.

Social security documents

Social Security Number (AMKA)

The Social Security Number (*Αριθμός Μητρώου Κοινωνικής Ασφάλισης*, AMKA) is a single, mandatory number for employment and insurance of all individuals subject to the Greek social security system.⁸⁹ Possession of an AMKA is a mandatory requirement *inter alia* for:

- Paid **Employment**, exercise of a profession, social security and registration with DYPA for the purpose of obtaining an **Unemployment Card**.
- Receipt of pension and general benefits, as well as **Social Benefits**.
- Transactions with EFKA and other insurance funds.
- Access to the health care system, electronic prescriptions of medication and examinations, **Health Care** and hospital care, COVID-19 vaccination.
- Access to **Homeless Shelters**.
- Transactions with various other public authorities, namely for the issuance of a driver's licence, an unlimited public transport card, sports matches tickets.

⁸⁶ *Ibid.*

⁸⁷ Information provided by Meraki Humanitarian Support, 20 March 2026.

⁸⁸ Information provided by the Greek Council for Refugees, 26 February 2026.

⁸⁹ Article 153 L 3655/2008, as amended by Article 56 L 5216/2025, Gov. Gazette A' 118/07.07.2025.

Greek law primarily designates KEP and EFKA as responsible authorities for granting AMKA.⁹⁰ As of 1 January 2025, the Ministry of Migration and Asylum is also designated as a competent authority for granting AMKA to the population groups under its responsibility, including beneficiaries of international protection.⁹¹ The Asylum Service had replied to RSA in February 2025 that “the responsible Informatics Directorate of the [Ministry of Migration and Asylum] has planned technical-level activities with the responsible service of IDIKA for the implementation of Article 1(5)(d) of [the AMKA Regulation]”.⁹² At the time of writing, however, the Ministry of Migration and Asylum still does not issue AMKA to beneficiaries of international protection.

KEP often refuse to issue AMKA to beneficiaries of international protection and refer them to EFKA Local Directorates, as confirmed by documents of the European Commission.⁹³ Nevertheless, the information sheet issued by the Asylum Service upon the grant of international protection continues to incorrectly refer beneficiaries to KEP for the purpose of obtaining AMKA.

Inactive AMKA issuance and conversion of PAAYPA into AMKA

The issuance of an inactive AMKA is conditioned upon possession of a “valid title of residence in the country with a right of labour market access”⁹⁴ such as a **Residence Permit** of a beneficiary of international protection.

Asylum seekers are not eligible for AMKA but obtain a Provisional Foreigner’s Insurance and Health Care Number (Προσωρινός Αριθμός Ασφάλισης και Υγειονομικής Περίθαλψης Αλλοδαπού, PAAYPA) upon the lodging of their asylum application.⁹⁵ If the asylum application is granted and a residence permit is issued, this number must be converted into AMKA within one month from the delivery of the ADET. PAAYPA is deactivated upon expiry of that deadline.⁹⁶

The conversion of PAAYPA into AMKA is not done automatically.⁹⁷ The beneficiary is required to book an appointment with an EFKA Local Directorate via the 1555 telephone line or with a KEP via **TAXISnet** to request the conversion. On the day of the appointment, they must submit an application for conversion of PAAYPA into AMKA and produce a valid **Residence Permit**, their asylum decision, their **AFM** certificate, and a document indicating the PAAYPA to be converted into AMKA e.g. copy of the DADP.

The conversion of PAAYPA into AMKA also requires prior notification of the issuance of ADET and deactivation of PAAYPA in respect of the person concerned to the e-Government Centre for Health and Social Security (Ηλεκτρονική Διακυβέρνηση Υγείας και Κοινωνικής Ασφάλισης, IDIKA).

⁹⁰ Article 153(2) L 3655/2008; Article 1(5) AMKA Regulation, JMD Φ80320/109864/2023, Gov. Gazette B’ 7280/22.12.2023.

⁹¹ Article 1(5)(d) AMKA Regulation.

⁹² Information provided by the Asylum Service, 24 February 2025.

⁹³ European Commission, *Bi-weekly update on the migratory situation in Greece (islands and mainland)* 22/10/2025, Ares(2025)9516355, 22 October 2025.

⁹⁴ Articles 2(1) and 3(3)(a) AMKA Regulation.

⁹⁵ Article 59(2) Asylum Code; Article 1(2) PAAYPA Regulation, JMD 605869/2022, Gov. Gazette B’ 5392/18.10.2022.

⁹⁶ Article 8(1) PAAYPA Regulation.

⁹⁷ Article 8(2) PAAYPA Regulation.

This notification must be made by the Asylum Service upon delivering the ADET to its holder.⁹⁸ In the event the Asylum Service has failed to notify the issuance of ADET, EFKA – or KEP – services cannot proceed to conversion of PAAYPA into AMKA. This issue becomes all the more complex in the case of people who have been granted more than one PAAYPA by the Asylum Service.

Single man deported from Germany: Khalid*, a refugee from Syria, was returned from Germany to Greece in July 2024 and has not obtained AMKA until now. In February 2025, AAU Fast-Track of the Asylum Service replied to RSA lawyers that the necessary arrangements were not yet in place for the Asylum Service to be able to issue AMKA. When Khalid* approached EFKA, he was not granted AMKA and was advised to contact the Asylum Service again. At the end of July 2025, RSA reverted with a request to AAU Fast-Track to notify the issuance of Khalid*'s ADET to IDIKA. The request was forwarded to RAO Attica and was left unanswered. In mid-December 2025, we asked again the Asylum Service to provide information on the notification of ADET. The Asylum Service replied that the notification of ADET had already been done since 2022 and that any obstacles faced by Khalid* in accessing AMKA were not attributable to the Asylum Service. Yet, when Khalid* appeared at a scheduled appointment with EFKA in early April 2026, it was again not possible for him to convert his PAAYPA into AMKA, since he was told that he had two separate PAAYPA appearing on the IDIKA information system, one of which appeared to still be active due to failure to notify the issuance of ADET. RSA lawyers approached the Asylum Service again to resolve the issue.

Further obstacles arise in practice as EFKA Local Services arbitrarily impose additional documentation requirements for conversion of PAAYPA into AMKA. Certain EFKA services require a **Travel Document** or a certificate of family status, from which beneficiaries of international protection are exempted by law, or even a work contract, required by law only for activation of AMKA.⁹⁹

Civil society organisations explain that EFKA services in most Local Directorates in Attica and outside the capital refuse to convert PAAYPA into AMKA without a work contract or a recruitment certificate from an employer. Even following repeated interventions and efforts to clarify the legal framework to those services, many Local Directorates remain unwilling to carry out the process, while others conduct the conversion in accordance with the requirements laid down in the law.¹⁰⁰ This issue is encountered in KEP as well. RSA has similar experience from cases represented in Athens and beyond:

⁹⁸ Ministry of Migration and Asylum, Reply to parliamentary question, 206879/2025, 30 October 2025, available [here](#). The Asylum Service notified 23,477 ADET to IDIKA from 1 January to 17 October 2025.

⁹⁹ Information provided by SolidarityNow, 24 March 2026.

¹⁰⁰ Information provided by Meraki Humanitarian Support, 20 Maptiou 2026. Similar issues are encountered by SolidarityNow in certain EFKA Local Directorates in Attica: Information provided by SolidarityNow, 24 March 2026.

Single man obstructed from access to AMKA: Nasruddin* is a recognised refugee from Pakistan. In March 2026, he attended a scheduled appointment at an EFKA Local Service outside Attica to convert his PAAYPA into AMKA. The service initially refused to carry out the conversion, citing instructions per which a work contract is required for the process. Following intervention from RSA lawyers who firmly requested to be informed of the legal basis for requiring a work contract, EFKA requested a family status certificate. The lawyers had to intervene again and to clarify the legal framework in order for EFKA to eventually grant Nasruddin* an inactive AMKA.

Single man deported from Germany: Ahmed*, a recognised refugee from Afghanistan, was deported from Germany at the end of December 2025 without being given back his valid ADET and travel document. At the time of writing, he only has a certificate from RAO Piraeus, stating that he awaits the retrieval of his documents. Upon booking an appointment with an EFKA Local Directorate in Athens for the purpose of conversion of his PAAYPA into AMKA, Ahmed* was asked by EFKA to provide proof of residence address and a work contract, even though RSA lawyers explained that he is homeless, he has not been registered by the Municipality of Athens until now and he has no homelessness certificate. On the day of Ahmed*'s appointment, EFKA refused to assist him on the ground that he did not have his valid ADET in his possession.

In addition, some EFKA Local Directorates refuse to receive people who do not reside within the area corresponding to the Directorate in question, even homeless refugees in Attica. EFKA services do not cite any legal basis and do not provide written reasoning behind this stance. EFKA sets the same requirement via the 1555 telephone line which books appointments with the Local Directorates. This restriction, among others, causes significant delays and further barriers to the scheduling of appointments, especially in Attica.¹⁰¹ Waiting times for appointments with EFKA Local Directorates in Attica often exceed one month.¹⁰²

Connection of AMKA to AFM

The connection of an individual's AMKA with their **AFM** is a crucial administrative process at the stage of conversion of PAAYPA into AMKA. Further obstacles arise if the AFM is not connected to AMKA at the conversion stage, not least the inability to access any online service that requires login with both AFM and AMKA for identification purposes e.g. online EFKA services, National Disability Portal, DYPA and others.

To carry out the connection of their AFM with AMKA at the stage of AMKA issuance, the person must have previously updated their personal details in the AADÉ records, as explained in the **AFM** section.

In the event of discrepancies in the registered details between AFM and AMKA records, EFKA services have proceeded to cancellations of AMKA.

¹⁰¹ Information provided by Meraki Humanitarian Support, 20 March 2026.

¹⁰² Information provided by SolidarityNow, 24 March 2026.

Cancellation of single man's AMKA: Talal*, a recognised refugee from Afghanistan, has resided in Greece for the past nine years. In March 2026, he was informed that he did not possess an active AMKA despite working in Greece. Talal* approached EFKA with the assistance of RSA lawyers, who were informed that EFKA cancelled his AMKA due to discrepancies in the registration of some of his personal details between the AADE records and the Asylum Service. Talal* was asked to first correct his details in the AADE records and then revert to EFKA with an application for a new AMKA.

Moreover, in the case of inactive AMKA, EFKA cannot make any change to the personal details registered in its records. Therefore, in the event the person requests connection of their AFM with their AMKA at any stage after the conversion of PAAYPE into AMKA, EFKA Local Services request the documentation needed for AMKA activation – i.e. work contract or recruitment certificate from an employer – in order to be able to make the necessary amendments.

AMKA activation

According to the AMKA Regulation, in force since 2024, activation of AMKA requires proof of lawful residence in Greece with a right to labour market access *and* of actual residence in Greece.¹⁰³ Proof of actual residence is subject to differential criteria for beneficiaries of international protection than those applicable to Greek nationals and EU citizens:

- ❖ Greek nationals and EU citizens activate their AMKA by producing **Proof of Residence Address** e.g. rental contract or certificate of accommodation uploaded on AADE records or a work contract or recruitment certificate from an employer, uploaded on the “ERGANI” information system of the Ministry of Labour and Social Security.¹⁰⁴
- ❖ For their part, third-country nationals and stateless persons, including beneficiaries of international protection, activate their AMKA by producing proof of residence address e.g. rental contract or certificate of accommodation uploaded on AADE records *and* a work contract or recruitment letter from an employer, uploaded on ERGANI.¹⁰⁵

The AMKA Regulation thereby imposes discriminatory treatment of beneficiaries of international protection compared to Greek nationals and EU citizens, contrary to the equal treatment obligations laid down in the Qualification Directive and Qualification Regulation vis-à-vis access of recognised refugees to rights such as health care and social welfare.¹⁰⁶ As systematically highlighted from 2024 to present, this provision means that recognised refugees and subsidiary protection holders who have not or are unable to secure lawful **Employment** in Greece are

¹⁰³ Article 5(1) AMKA Regulation.

¹⁰⁴ Article 6(1)(b) and (3)(b) AMKA Regulation.

¹⁰⁵ Article 6(5)(b) AMKA Regulation.

¹⁰⁶ Articles 29 and 30 Qualification Directive; Articles 31 and 32 Qualification Regulation; Articles 29 and 30 Asylum Code.

unable to obtain an active AMKA and are thus excluded from access to **Health Care** and **Social Welfare**.¹⁰⁷ Further detail is provided in the respective sections below.

The European Commission¹⁰⁸ and the Greek Ombudsman¹⁰⁹ continue to repeatedly raise grave concerns against the AMKA Regulation. The European Commission stresses in particular that “the new provisions of the law on the AMKA activation set additional requirements (e.g., having an employment contract) for beneficiaries of international protection and legally residing third-country nationals in comparison to Greek citizens. This provision hinders the effective access to the healthcare system by beneficiaries of international protection and legally residing third country nationals, and is particularly worrying for persons with disabilities who are unable to work.”¹¹⁰

The Ministry of Migration and Asylum has replied to those concerns with reference to the need for legislative reform to overcome the obstacle imposed against beneficiaries of international protection.¹¹¹ The Ministry of Labour and Social Security is also aware of the barriers set by Greek legislation.¹¹²

Yet, the aforementioned provisions of the AMKA Regulation remain in force to date, despite a July 2025 amendment to the legislative authorisation provision of Article 153(5) L 3655/2008 with a view to future adoption of secondary legislation governing *inter alia* the “special categories for which AMKA activation is permitted without access to the labour market or entry into the social security system”. At the time of writing, no amendment has been made to the regulatory framework on AMKA and the conditions set in the AMKA Regulation have continued to apply from 2024 to present.

Given the absolute need for active AMKA for any effective exercise of rights attached to international protection status and for transactions with essential public and private institutions, we clearly believe that the requirement of a work contract or a recruitment certificate uploaded on ERGANI for access to AMKA deprives beneficiaries of international protection of their fundamental rights to health, social welfare, and housing. Greek law maintains a circular logic whereby access to basic rights as a minimum precondition for integration into the host society

¹⁰⁷ RSA et al., ‘Δικαιούχοι διεθνούς προστασίας’, β/139/24.10.2024, 24 October 2024; GCR et al., ‘Απόδοση και λειτουργία AMKA και διασφάλιση κοινωνικών δικαιωμάτων δικαιούχων διεθνούς προστασίας’, 358/2024, 15 July 2024.

¹⁰⁸ European Commission, ‘Implementation of new law on AMKA and its repercussions on Beneficiaries of International Protection and legally residing third-country nationals’, Ares(2024)8316809, 22 November 2024; *18th Steering Committee Meeting for Migration Management*, Ares(2024)5820415, 6 June 2024; Email correspondence: ‘Meeting with Deputy Minister Voultepsi’, Ares(2024)5589966, 16 May 2024; Meeting Minutes of the Legal Aid Working Group CEAS Sub-Working Group, 11 November 2024.

¹⁰⁹ Ombudsman, ‘Ιατροφαρμακευτική περίθαλψη δικαιούχων διεθνούς προστασίας – Ανεργό Α.Μ.Κ.Α’, 385955/13692/2026, 20 February 2026; *Annual Report 2024*, May 2025, 72, available [here](#).

¹¹⁰ European Commission, ‘Implementation of new law on AMKA and its repercussions on Beneficiaries of International Protection and legally residing third-country nationals’, Ares(2024)8316809, 22 November 2024.

¹¹¹ Ombudsman, *Annual Report 2024*, May 2025, 72, 170-171.

¹¹² European Commission, Email correspondence: ‘Meeting with Secretary General for Social Affairs, Mr Tsangaropoulos’, Ares(2025)4503310, 22 November 2024.

and for search of employment is in fact conditioned upon already secured employment. As stated by the Greek Ombudsman, this “runs counter to any sense of integration policy.”¹¹³

The requirement of a work contract or a recruitment certificate uploaded on ERGANI is strictly enforced in practice, even in respect of persons who expressly put forward objective factors preventing them from engaging in lawful employment, not least disabilities and serious health conditions. In a recent case represented by RSA, a disabled refugee had to apply to the European Court of Human Rights (ECtHR) and to obtain interim measures under Rule 39 of the Rules of Court to prevent an imminent risk for her life and health, owed to EFKA's refusal to activate her AMKA without the required documents set out in the AMKA Regulation.¹¹⁴ Similar cases known to us have required persistent interventions before the Greek authorities to lead IDIKA to exceptionally activate AMKA of people with pressing needs for survival treatment. We provide more information on these cases and on the serious deficiency of the Greek system in the [Health Care](#) section.

In other cases brought before the Greek Ombudsman, EFKA has refused to activate AMKA of seriously ill refugees without a work contract or recruitment certificate, citing the AMKA Regulation in force. EFKA states that “until completion of the adoption and publication of the [Joint Ministerial Decision] and of the adaptation of the AMKA platform by IDIKA, activation of AMKA following conversion from PAAYPA is not possible.”¹¹⁵

Finally, the AMKA Regulation provides that AMKA shall be deactivated where the conditions for activation cease to be met.¹¹⁶ The requirement of a “valid” residence permit for an active AMKA under the AMKA Regulation creates substantial obstacles for people in practice, given that AMKA is deactivated upon interruption of lawful residence in the country. “Specifically as regards deactivation due to non-legal residence in the country, [deactivation] shall automatically take place on the day following the expiry of validity of the residence title, in the absence of renewal, extension or withdrawal of the status of international or temporary protection”.¹¹⁷ This means that the activation status of AMKA is inevitably impacted by the protracted delays in the renewal of [Residence Permits](#), which reach or even exceed one year.

Insured Person Number (AMA)

Registration on the EFKA Insured Persons Registry (*Μητρώο Ασφαλισμένων*) and issuance of an Insured Person Number (*Αριθμός Μητρώου Ασφαλισμένου, AMA*) and of a certificate of registration (*βεβαίωση απογραφής*)¹¹⁸ are necessary formalities for engaging in paid [Employment](#). The application for registration on the EFKA registry is submitted in person before an EFKA Local Directorate upon appointment. Such an appointment cannot be scheduled via the EFKA online

¹¹³ Ombudsman, ‘Προϋποθέσεις ενεργοποίησης του Αριθμού Μητρώου Κοινωνικής Ασφάλισης (AMKA) για τους δικαιούχους διεθνούς προστασίας’, 353419/34964/2024, 12 July 2024.

¹¹⁴ RSA, ‘ECtHR interim measures secure access to medication for recognised refugee with serious health condition and inactive AMKA in Greece’, 20 February 2026, available [here](#).

¹¹⁵ Ombudsman, ‘Ιατροφαρμακευτική περιθαλψη δικαιούχων διεθνούς προστασίας – Ανενεργό Α.Μ.Κ.Α’, 385955/13692/2026, 20 February 2026.

¹¹⁶ Article 7(2) AMKA Regulation.

¹¹⁷ *Ibid.*

¹¹⁸ EFKA, *Χορήγηση βεβαίωσης απογραφής μέσω ηλεκτρονικών υπηρεσιών e-ΕΦΚΑ*, 239653/2020, 2 Οκτωβρίου 2020, available [here](#).

platform if the individual has not already undergone registration and obtained AMA.¹¹⁹ The certificate is granted online via the EFKA website only upon successful completion of registration.

Publicly available EFKA instructions cite **AMKA**, the **Residence Permit**, **AFM** and the recruitment certificate from an employer uploaded on ERGANI as mandatory documents for registration.¹²⁰ These documents do not suffice for registration in practice, however. EFKA services invoke internal instructions requiring **Proof of Residence Address** by document uploaded on AADE records as an additional formality,¹²¹ without specific legal basis.¹²²

People present or returned to Greece without documentation attesting permanent residence in Greece and tax residence in Greece are unable to register with EFKA and to receive AMA. Hence, EFKA practice creates a 'catch 22', whereby people must already rent property in order to start working. The requirement of proof of residence address results even in loss of secured employment, in conjunction with delays in the scheduling of appointments with EFKA Local Directorates.¹²³

In addition, the information guide of the Ministry of Migration and Asylum and UNHCR cites IBAN or booklet of a **Bank Account** as a requirement for AMA issuance.

Here too, access to AMA is hampered by certain EFKA Local Directorates' refusal to receive people who do not reside within their area of competence.¹²⁴ In addition, the issuance of AMA is not done automatically, as it requires prior verification of the above documents. This results in delays of several weeks in registrations with EFKA.¹²⁵

Unemployment card

The grant of an unemployment card is conditioned upon registration on the DYPA digital registry. This requires a **Residence Permit**, **AFM** and **AMKA**. Registration on the DYPA registry attests that the individual is not employed, that they are able to work and that they are actively seeking employment.

However, in the case of persons with disabilities who may not be able to work, registration as a disabled person on the DYPA registry is not possible unless the individual has already obtained a **Disability Certification** from an EFKA Disability Certification Centre (**Κέντρο Πιστοποίησης Αναπηρίας**, KEPA). Accordingly, due to their inability to activate **AMKA** without meeting the formal requirement of a work contract or recruitment certificate uploaded on ERGANI, persons with disabilities who cannot actively seek employment on account of their condition are barred from obtaining an unemployment card.

¹¹⁹ Information provided by SolidarityNow, 24 March 2026.

¹²⁰ EFKA, *Απογραφή Μισθωτού*, July 2024, available [here](#).

¹²¹ Information provided by the Greek Council for Refugees, 26 February 2026.

¹²² Information provided by SolidarityNow, 24 March 2026.

¹²³ Information provided by Meraki Humanitarian Support, 20 March 2026.

¹²⁴ Information provided by SolidarityNow, 24 March 2026.

¹²⁵ *Ibid.*

Social welfare

No support for transition to social welfare

There is no dedicated social benefit for beneficiaries of international protection in Greece to guarantee their transition into the social welfare system in view of their particular circumstances. The financial allowance (“cash assistance”)¹²⁶ afforded to asylum seekers as part of material reception conditions is automatically ceased as soon as the cash assistance operator is informed of a decision granting international protection is taken, even if it has not yet been notified to the person.¹²⁷

Importantly, the disbursement of the monthly financial allowance to asylum seekers has ceased completely since the termination of the relevant programme at the end of March 2025,¹²⁸ without any immediate prospects of reinstatement and with “no solution in sight”.¹²⁹ Over the past twelve months, the RIS has not granted any cash assistance to the tens of thousands of asylum seekers who applied for protection in Greece.

Whereas Greek nationals can directly apply for social benefits online, third-country nationals and stateless persons, including beneficiaries of international protection, may only apply for benefits through municipal services, namely Community Centres (*Κέντρα Κοινότητας*) or Migration Integration Centres (*Κέντρα Ένταξης Μεταναστών*, KEM) where available.

Exclusion from the majority of benefits

The lengthy residence requirements underpinning most benefits do not take into account the particular situation of refugees and thereby entail differential treatment against beneficiaries of international protection compared to Greek nationals and effectively exclude them from most forms of social assistance. Specifically:

- ❖ The housing allowance (*επίδομα στέγασης*) is available to up to 600,000 households living in rented accommodation or paying a mortgage on their main family home,¹³⁰ through monthly financial support ranging from 70 € to 210 € depending on family composition.¹³¹

¹²⁶ Article 1(h) Asylum Code.

¹²⁷ Annex III(D)(1)(i) MD 2089/2021, Gov. Gazette B' 3120/16.07.2021, inserted by MD 2857/2021, Gov. Gazette B' 4496/29.09.2021.

¹²⁸ Ministry of Migration and Asylum, Reply to parliamentary question, 24237/2026, 6 February 2026, available [here](#).

¹²⁹ By way of example, European Commission, Email correspondence: ‘Meeting between DG Gminder / Greek Minister for Migration and Asylum’, Ares(2025)357776, 2 October 2025.

¹³⁰ Article 3 L 4472/2017, Gov. Gazette A' 74/19.05.2017.

¹³¹ Ministry of Social Cohesion and Family, Reply to parliamentary question, 1422/2026, 22 January 2026, available [here](#).

Eligible persons must legally and permanently reside in Greece for a minimum of five years prior to applying for a rental allowance.¹³² This condition renders the allowance inaccessible to beneficiaries who obtained status in recent years and/or to those who have not managed to submit tax declarations on time and/or who have not remained in Greece without interruption. Further obstacles arise from the requirement of a valid rental contract for the entire duration of the granting of the benefit.¹³³

- ❖ The one-off child-birth allowance (*επίδομα γέννησης*) is available to mothers who are third-country nationals, including beneficiaries of international protection, upon condition that they establish twelve years of permanent and uninterrupted residence in Greece, as demonstrated through the submission of tax declarations.¹³⁴ Accordingly, the vast majority of status holders are excluded from this benefit.
- ❖ The monthly child support allowance (*επίδομα παιδιού*) – ranging from 28 € to 70 € per child according to income and household size – is expressly available to persons who fulfil five years of permanent and uninterrupted residence in Greece, as demonstrated through the submission of tax declarations.¹³⁵
- ❖ The uninsured retiree benefit, up to a maximum of 360 € for an uninsured person aged 67, is available to persons who have had permanent and uninterrupted residence in Greece for fifteen years.¹³⁶

Indirect discrimination against beneficiaries of international protection in respect of access to social benefits therefore constitutes a structural deficiency and breach of Article 29 of the Qualification Directive and Article 30 of the Qualification Regulation. In May 2025, the European Commission proceeded to the second stage of the INFR(2022)2044 infringement procedure with a reasoned opinion against Greece,¹³⁷ without any meaningful engagement on the matter from the Greek government to date, however.¹³⁸

¹³² Article 3(6) L 4472/2017. Residence is demonstrated by timely submission of a tax declaration: Article 4(3) Housing Allowance Regulation, JMD 71670/2021, Gov. Gazette B' 4500/29.09.2021.

¹³³ Article 5(1) Housing Allowance Regulation.

¹³⁴ Articles 1(2) and 7(1)(e) and (2) L 4659/2020, Gov. Gazette A' 21/3.2.2020, as amended by Articles 29 and 30 L 5092/2024, Gov. Gazette A' 33/04.03.2024.

¹³⁵ Article 214(11) L 4512/2012, as amended by Article 15(1) L 4659/2020. The same conditions apply as regards timely submission of a tax declaration: Article 2(1) Child Care Allowance Regulation, JMD Γ.Π.οικ.Δ22/11/2705/58/2018, Gov. Gazette B' 57/18.01.2018.

¹³⁶ Article 93 L 4387/2016, Gov. Gazette A' 85/12.05.2016, as last amended by Article 68 L 4992/2022, Gov. Gazette A' 213/17.11.2022.

¹³⁷ European Commission, 'May infringements package: key decisions', 7 May 2025, available [here](#).

¹³⁸ European Commission, *Mission Report – Visit of HOME DG Gminder to Greece 8-9 September 2025*, Ares(2025)9223739, 9 September 2025.

Other benefits without a required minimum residence period

Guaranteed minimum income (EEE)

Contrary to the benefits described above, no minimum residence period is required for eligibility for guaranteed minimum income (*ελάχιστο εγγυημένο εισόδημα*, EEE),¹³⁹ a 216 € monthly allowance per household, plus 108 € per additional adult and 54 € per additional child.¹⁴⁰

Guaranteed minimum income is subject to the cumulative conditions of financial capacity below the poverty line, and lawful, permanent residence in Greece.¹⁴¹ Families with children also must produce schooling certificates, which include sufficient attendance of the child over the previous academic year.¹⁴²

The EEE Regulation foresees three categories eligible for guaranteed minimum income:¹⁴³

- ❖ Single-person households: persons living alone in a home;
- ❖ Multiple-person households: the total number of people living under the same roof, including hosted persons or families;
- ❖ Homeless persons: persons living on the street or in inadequate dwellings, upon condition that they have been registered by municipal social services or community centres or make use of municipal homeless shelters and women's shelters. Homelessness must be proven via a municipality certificate and cannot be demonstrated by tax declaration alone.¹⁴⁴

As highlighted by the Greek Ombudsman, the reference to “households” in the law results in excluding from guaranteed minimum income many persons or families who, owing to a lack of resources, have to move in with a person or household living above the poverty line or are hosted without receiving any form of social welfare, without being members of the same household. That is given that the term “multiple-person household” encompasses all persons living under the same roof. For their part, persons remaining in camps (RIC, CCAC, CTRC) of the Greek reception system are equally excluded from the scope of “household”.¹⁴⁵

For their part, homeless persons require a homelessness certificate instead of **Proof of Residence Address**. As highlighted above, a homelessness certificate is issued in Athens only to people located by the KYADA Street Work Team during on-site missions on the streets and registered on its registry of homeless persons. In addition, KYADA issues homelessness certificates for explicit and specific purposes such as applications for social benefits only where the remainder of conditions for such a request are met.

¹³⁹ Article 235 L 4389/2016, as last amended by Article 177 L 5078/2023, Gov. Gazette A' 211/20.12.2023. See also Article 29(2) L 4659/2020.

¹⁴⁰ Article 2(7) EEE Regulation, JMD Δ13/οικ.53923/2021, Gov. Gazette B' 3359/28.07.2021, as amended by JMD 97046/2023, Gov. Gazette B' 6456/13.11.2023.

¹⁴¹ Article 3 EEE Regulation on the specific financial means criteria.

¹⁴² Article 4(1) EEE Regulation.

¹⁴³ Article 2(1) EEE Regulation.

¹⁴⁴ Articles 2(1)(c) and 7(2) EEE Regulation.

¹⁴⁵ Ombudsman, *Πρότασεις για τα προνοιακά προγράμματα «Ελάχιστο Εγγυημένο Εισόδημα» και «Επίδομα Στέγασης»*, 103/2020, 6 July 2020.

At the same time, the European Commission highlights that beneficiaries who have received rental subsidies from the **HELIOS+** are excluded from guaranteed minimum income.¹⁴⁶ Despite constant discussions on the matter,¹⁴⁷ the Greek government has not put forward amendments to the law aimed at covering these groups to date.

Formal requirements for the application for EEE include possession of a valid **Residence Permit**, as well as **AFM**, **TAXISnet Credentials**, a **Tax Clearance Certificate**, an **Active AMKA** and a **Bank Account**. Accordingly, beneficiaries of international protection who have not already secured lawful **Employment** to activate their AMKA cannot request EEE.

Official figures of the Ministry of Social Cohesion and Family refer to 157,759 households benefitting from EEE in November 2025.¹⁴⁸ There are no available disaggregated data on EEE beneficiaries by nationality and legal status.

Disability benefits

Greek law set out a process of evaluation and certification of disability by the KEPA under EFKA as a prerequisite for applying for disability benefits.¹⁴⁹ The application for disability evaluation and certification is lodged on the **Digital KEPA** webpage via the National Disability Portal website. To submit such an application, an individual needs **TAXISnet Credentials** and must introduce their name and surname and their **AFM** and **AMKA**. Their contact details must also be registered on the **National Communications Registry**.

Recognised refugees whose contact details on EMEP do not fully correspond to those registered in EFKA records cannot access the online application in practice, as the platform issues an alert stating: “No lawful residence data found for the citizen”, and directs the user back to the homepage. The application can only be submitted in person at a KEPA of EFKA or the municipality of the person's place of residence.

¹⁴⁶ European Commission, *Task Force Migration Management Mission Report – Greece – Jan/Feb 2022*, Ares(2022)1024324, 11 February 2022, 5.

¹⁴⁷ *Ibid.*

¹⁴⁸ Ministry of Social Cohesion and Family, Reply to parliamentary question, 94/2026, 27 December 2025, available [here](#).

¹⁴⁹ Article 4(1)(e) L 4520/2018, Gov. Gazette A' 30/22.02.2018, as amended by Article 54(1) L 4997/2022, Gov. Gazette A' 219/25.11.2022, with reference to the relevant legal instruments. See also Article 4(3) JMD Δ12α/Γ.Π.οικ.68856/2202/2018, Gov. Gazette B' 5855/28.12.2018, as amended by JMD Δ12α/85008/2022, Gov. Gazette B' 4879/15.09.2022.

Housing

Greek law provides that beneficiaries of international protection enjoy equal treatment to other legally residing third-country nationals as regards access to housing.¹⁵⁰ However, securing housing remains one of the most critical issues faced by refugees in Greece, in the absence of a state policy of social housing and of special consideration for the particular obstacles incumbent on them on account of their situation.

The problem is exacerbated by the housing crisis affecting the country, with a continuous rise in rent prices and drop in property supply in urban centres such as Athens, Piraeus and Thessaloniki.¹⁵¹ Further repercussions of the shortage in affordable housing are felt, among others, in the steady saturation of **Homeless Shelters** given the inability to free up accommodation places and the constant rise of rental and living costs in Greece.

We recall that eligibility for the **Housing Allowance** is subject *inter alia* to a minimum residence requirement of five years and thereby cannot be met by beneficiaries of international protection, as a rule. This is highlighted by the European Commission in the pending infringement proceedings against Greece for breach of Article 29 of the Qualification Directive.

These broader challenges are compounded not only by circumstances peculiar to refugees e.g. language barrier, discrimination in the housing market, failure of the state to provide people with benefits to support their transition from the asylum process into integration, but also by the complete halt even of the basic financial allowance the Greek state is required to afford during the asylum process. As a result, tens of thousands of people granted international protection in Greece without having received a single euro from the state during their asylum procedure are automatically called to search for housing in a real estate market that expects them to hold a plethora of **Essential Documents**, to wield the Greek language and to have the financial means to afford several hundreds of euros in monthly expenses.

HELIOS+ programme

According to the European Commission, the HELIOS+ programme “is the main programme dedicated to fostering the integration of third-country nationals into Greek society”.¹⁵²

¹⁵⁰ Article 31 Asylum Code.

¹⁵¹ For instance, in.gr, ‘Κάτι τρέχει με τα ενοίκια: Άλλα μας λέει η τσέπη μας και άλλα... οι στατιστικές’, 16 January 2026, available [here](#); Kathimerini, ‘Στα επίπεδα της Εκάλης τα ενοίκια στο κέντρο’, 15 January 2026, available [here](#); News 24/7, ‘Πόσο κοστίζει η ενοίκιαση κατοικίας σε Αθήνα, Πειραιά και Θεσσαλονίκη’, 16 January 2026, available [here](#).

¹⁵² European Commission, *Mission Report – Visit of HOME DG Gminder to Greece 8-9 September 2025*, Ares(2025)9223739, 9 September 2025.

The HELIOS+ programme was formally launched in early 2025 and is implemented across 12 Greek regions by the International Organisation for Migration (IOM) and associated partners such as the Greek Council for Refugees (GCR), Caritas Hellas, SolidarityNow, under European Social Fund+ 2021-2027 funding for the period 2025-2028. However, certain services such as Greek language lessons have not yet started, while some regions already halted new registrations in early 2026 and started preparations in view of termination of the programme, as explained below.

Conditions and formalities

The HELIOS+ programme is available to unemployed persons granted international or temporary protection no earlier than 24 months prior to enrolment.¹⁵³ The following documents are required for registration on the programme, according to written information provided by IOM to RSA in 2025 further to an enrolment request of a recognised refugee deported from Germany:¹⁵⁴

1. Decision granting international or temporary protection status less than 24 months prior to the enrolment application
2. **AFM** certificate
3. **TAXISnet Credentials**
4. **Unemployment Card** and unemployment duration certificate. These require **AMKA**

These criteria, including unemployment and the 24-month timeframe from grant of protection status, are strictly and cumulatively enforced and are not circumvented even in cases of people returned to Greece from other countries.¹⁵⁵ The unemployment condition in particular is a main source of delays in the registration of new programme beneficiaries due to the lengthy process of verification of documents attesting unemployment.¹⁵⁶

In the experience of RSA, as well as other civil society organisations, HELIOS+ programme partners do not offer support for the issuance of the above documents.¹⁵⁷

Capacity and statistics

HELIOS+ award decisions by region are as follows:

Funding & target population in HELIOS+ award decisions by region: 1 Jan 2025 – 30 Jun 2028			
	Target (persons)	Funds (millions)	Award decision
Attica	1,650	26.2	30 Dec 2024, here
Central Macedonia	575	10	30 Dec 2024, here
Crete	560	12	30 Dec 2024, here

¹⁵³ IOM, *HELIOS+ Project Regulations Handbook*, October 2025, 2, available [here](#).

¹⁵⁴ Information provided by IOM, 16 April 2025.

¹⁵⁵ Information provided by the Greek Council for Refugees, 26 February 2026; Information provided by SolidarityNow, 24 March 2026.

¹⁵⁶ Information provided by the Greek Council for Refugees, 26 February 2026.

¹⁵⁷ Information provided by Meraki Humanitarian Support, 20 March 2026.

Western Greece	290	5.1	13 Jan 2025, here
Northern Aegean	280	5.1	17 Jan 2025, here
Southern Aegean	210	3.8	17 Jan 2025, here
Peloponnese	200	2.3	17 Jan 2025, here
Thessaly	150	3.5	13 Jan 2025, here
Western Macedonia	148	2.3	17 Jan 2025, here
Thrace	130	3.6	30 Dec 2024, here
Central Greece	100	1.8	13 Jan 2025, here
Ionian Islands	30	0.6	13 Jan 2025, here
Total	4,323	76.4	

On the one hand, the award decisions show that the programme has been designed at a dramatically lower scale to the actual needs of the refugee population in Greece. The HELIOS+ award decisions set a total target of 4,323 beneficiaries of international and temporary protection that will benefit from support over the next four-year period – just over 1,000 a year.

Greece, however, counted 134,576 active international and temporary protection residence permits at the end of last year. In the last two years alone, Greece granted international protection to more than 67,000 people, as stated in the [Introduction](#). This number does not include temporary protection holders.

On the other hand, some Greek regions have halted new enrolments of HELIOS+ beneficiaries and submissions of new rental contracts as of early 2026, since they are in the last semester of project implementation and have not received formal confirmation of extension of the programme. As of early April 2026, the European Commission had not received information from the Ministry of Migration and Asylum as to the exact timeline of renewal of the projects concerned.¹⁵⁸

At the end of 2025, the HELIOS+ programme had registered 1,318 households amounting to a total of 1,883 people. Of those, 1,270 were beneficiaries of international protection and 613 holders of temporary protection. About ¾ of households were single adults.¹⁵⁹

Housing support services and additional formalities

HELIOS+ does not offer accommodation *per se*. Unemployed persons enrolled on the programme who have already signed a rental contract in their name can currently benefit from a rental subsidy for up to 12 months. Additional formal requirements for obtaining such a subsidy are as follows:¹⁶⁰

1. Rental contract in the person's name for property with a monthly rental cost below 800 €, uploaded on AADE records in electronic format. Signature of the agreement is

¹⁵⁸ Meeting Minutes of the Legal Aid Working Group CEAS Sub-Working Group, 6 April 2026, Item 2.6; 2 March 2026, Item 1.4.

¹⁵⁹ IOM, *HELIOS+ Factsheet*, 31 December 2025, available [here](#).

¹⁶⁰ IOM, *HELIOS+ Project Regulations Handbook*, October 2025, 10-12.

conditioned upon payment of a deposit usually corresponding to two months' rent. Securing such an amount can be extremely demanding, if not prohibitive, against the constant increase in rent prices experienced particularly by large Greek cities, as mentioned above. We recall that only persons registered as unemployed may enrol on HELIOS+. In fact, ¾ of HELIOS+ support recipients describe the coverage of costs of living as “difficult” or “very difficult”.¹⁶¹

2. Document attesting the Greek **Bank Account** and IBAN of the person renting the property.
3. Document attesting the bank account and IBAN of the landlord.

934 people received rental subsidies under the HELIOS+ programme at the end of 2025, of whom almost half were temporary protection holders from Ukraine.¹⁶²

The continuity of the above support services provided under HELIOS+ is uncertain at present. On the one hand, some regions have halted new enrolments and submissions of rental contracts. On the other hand, the Greek government has made consistent public announcements of phasing out of housing support to beneficiaries of international protection and to redirection of funding away from accommodation. The Minister of Migration and Asylum has stated:

- In September 2025 that “those who obtain asylum in Greece will have the possibility to work through programmes, they will not live on benefits. The logic of getting asylum and living off of Greek and European taxpayers does not exist”.¹⁶³
- In October 2025 that “In an overhaul of the benefits system, HELIOS programmes are amended and funds channelled until now to rental subsidies will be transferred in total to professional training and Greek language programmes. Apartments rented in central Athens and subsidised through the HELIOS programme to asylum holders will be made available to Athens residents again. For those beneficiaries of asylum who choose to remain in Greece, we will provide possibilities to work and integrate through employment, not through subsidies.”¹⁶⁴
- In January 2026 that “Those who are entitled to asylum have the possibility, if they so choose, to remain in the country through employment. We take all funds and direct them to employment possibilities. We do not believe that housing actions make sense. Subsidising the rent of a Sudanese farmer to stay in Kypseli, Agios Panteleimon or Patisia [in Athens] is completely useless and that person is most likely to either do nothing or to be brought by some into criminal activities.”¹⁶⁵

¹⁶¹ IOM, *HELIOS+ Factsheet*, 31 December 2025.

¹⁶² *Ibid.* See also European Commission, *20th Steering Committee Meeting for Migration Management*, Ares(2025)3957815, May 2025.

¹⁶³ Ministry of Migration and Asylum, ‘Θ. Πλεύρης στην ΕΡΤ: Η Κρήτη θα αποσυμφορηθεί τις επόμενες ημέρες’, 16 September 2025, available [here](#).

¹⁶⁴ Ministry of Migration and Asylum, ‘Υπογραφή συμφωνίας Υπουργείου Μετανάστευσης με Υπερταμείο: Μείωση δαπανών και δραστικός περιορισμός επιδομάτων’, 6 October 2025, available [here](#).

¹⁶⁵ Ministry of Migration and Asylum, ‘Θ. Πλεύρης στον ΣΚΑΪ 100,3: Υψώνουμε ένα τεράστιο τείχος στην παράνομη μετανάστευση κι αφήνουμε μια πόρτα ανοιχτή στη νόμιμη’, 13 January 2026, available [here](#).

At the time of writing, despite requests from the Directorate-General for Employment (DG EMPL) of the European Commission for clarifications on the above public statements, the Ministry of Migration and Asylum has not provided a response on the potential phasing out of rental subsidies under the HELIOS+ programme.¹⁶⁶

Lack of access to accommodation

Evictions from camps & refusal to shelter recognised refugees

Material reception conditions made available throughout the asylum process in Greece are immediately ceased upon grant of international protection.¹⁶⁷ As recalled in the section on **Social Welfare**, not a single asylum seeker has received cash assistance during the asylum procedure in the last twelve months.

The 30-day deadline given to beneficiaries to vacate their reception places in RIS camps (RIC, CCAC, CTCR) after obtaining a positive decision remains in force.¹⁶⁸ We reiterate our constant concern that the 30-day deadline is not sufficient at all to enable beneficiaries to obtain **Essential Documents** such as an ADET, let alone to secure accommodation.

Refugees face forced departure from camps and continue to end up homeless without means of subsistence, even in particularly vulnerable cases.¹⁶⁹ CCAC on islands such as Leros and Kos continue to strictly enforce forcible departures of refugees upon expiry of the 30-day deadline even for vulnerable cases, despite the fact that delays in the issuance of ADET are attributable to the authorities.¹⁷⁰ As recently put by the European Commission, "Delays, strict eviction policies, and limited accommodation outside camps create protection risks for vulnerable residents."¹⁷¹

Beneficiaries of international protection who vacate their accommodation place in a camp usually end up on the street or in precarious conditions.¹⁷² They cannot spontaneously enter the same or a different RIS camp for shelter. The same applies to beneficiaries returned to Greece upon deportation from another European country, even in vulnerable cases with acute protection

¹⁶⁶ Meeting Minutes of the Legal Aid Working Group CEAS Sub-Working Group, 6 April 2026, Item 2.6; 2 March 2026, Item 1.4; 21 January 2026, Item 1.4; 17 November 2025, Item 1.4.

¹⁶⁷ Article 109(1) Asylum Code.

¹⁶⁸ *Ibid.* The Greek government did not follow through on its commitments to amend the rule: European Commission, Letter to the Minister of Migration and Asylum, Ares(2024)1148176, 14 February 2024; 16th Steering Committee Meeting for Migration Management, Ares(2024)7532741, 22 March 2024.

¹⁶⁹ On Samos: European Commission, Email correspondence: 'Updated Samos report', Ares(2024)7041697, 5 August 2024, 2. On Kos: Equal Rights Beyond Borders, *Kos's Unseen Housing Crisis*, November 2024, available [here](#).

¹⁷⁰ RSA et al., 'Δικαιούχοι διεθνούς προστασίας', β/139/24.10.2024, 24 October 2024. See also Equal Rights Beyond Borders, 'European Court of Human Rights orders to accommodate family with infant and ensure medical care', 25 July 2024, available [here](#).

¹⁷¹ European Commission, *Bi-weekly update on the migratory situation in Greece (islands and mainland)* 18/12/2025, Ares(2025)11350035, 18 December 2025.

¹⁷² Information provided by Meraki Humanitarian Support, 20 March 2026.

needs. Our requests to Ministry of Migration and Asylum services for housing of people deported back to Greece without shelter are systematically met with negative replies from the RIS, stressing that beneficiaries of international protection are not eligible for accommodation in camps due to their legal status.

The sole exception to our knowledge is an EU-funded, yet unpublished by the Ministry of Migration and Asylum and by IOM, “bridging programme” implemented by IOM in collaboration with the German and Greek authorities. This programme offers four-month accommodation in RIS camps to persons eligible for enrolment on HELIOS+ who voluntarily return from Germany to Greece.¹⁷³ According to official figures of the German authorities, no more than 16 beneficiaries of international protection had entered the programme from launch to fall 2025, out of a total of 4,132 who received information for participation in the programme during that time.¹⁷⁴ Meanwhile, Germany deported 413 beneficiaries of international protection to Greece last year.

RSA submits requests for housing of recognised refugees deported to Greece from other countries to additional services of the Ministry of Migration and Asylum. The Social Integration Directorate of the Secretariat-General for Migration and Asylum has not replied to most requests. Conversely, the National Emergency Response Mechanism (*Εθνικός Μηχανισμός Επείγουσας Ανταπόκρισης*, EMEA) operating under the Secretariat-General for Vulnerable Persons and Institutional Protection of the same Ministry¹⁷⁵ responds promptly. However, EMEA does not have means of housing and mostly assists in exploring referrals to other entities such as **Homeless Shelters**, without being able to overcome the structural problems of homelessness in Greece.

¹⁷³ European Commission, *Communication on the status of migration management in mainland Greece*, COM(2025) 170, 4 May 2025, 13.

¹⁷⁴ Federal Government of Germany, Reply to parliamentary question, 21/2339, 20 October 2025, 8, available [here](#).

¹⁷⁵ As of 20 March 2026, EMEA is responsible for alerting cases of homeless vulnerable third-country nationals or stateless persons and for referring them to competent services and facilities: Article 42 PD 106/2020, inserted by PD 13/2026, Gov. Gazette A' 43/20.03.2026.

Single man deported from Germany: Farid*, a recognised refugee from Afghanistan, was deported from Germany in February 2026 and has since remained homeless in Greece. In March 2026, RSA wrote to the Ministry of Migration and Asylum with a request for housing. The RIS replied as follows: "Your client is not eligible for housing and material reception conditions in a CTRC of RIS due to legal status (recognised refugee)". EMEA contacted RSA by phone within short time, highlighting, however, that they are not aware of any housing possibilities at present.

Single man deported from Germany: Sultan*, a stateless recognised refugee with a serious medical history and need for psychological support, was deported in August 2025 from Germany to Greece. At the end of the month, RSA directed a request for housing to the Ministry of Migration and Asylum, where it noted that Sultan* remained homeless and that its contacts with homeless shelters in Athens were unsuccessful in securing accommodation for him. The RIS responded to the request as follows: "Your client... cannot be accommodated in a CTRC of RIS due to legal status". For its part, the Secretariat-General for Vulnerable Persons and Institutional Protection replied that "at present there are no housing frameworks for single men implemented and supervised by the Secretariat-General for Vulnerable Persons and Institutional Protection".

Single woman deported from Sweden: Farzane*, a recognised refugee from Afghanistan, was deported from Sweden to Greece at the end of April 2025. RSA lawyers wrote to the RIS, among other services, to request emergency housing and assistance for the woman. The RIS replied to the request as follows: "The [third-country national] in question cannot be housed in a facility under the responsibility of the RIS as she is ineligible due to legal status". Upon response from EMEA at the Secretariat-General for Vulnerable Persons and Institutional Protection, Farzane* was referred to emergency accommodation in a shelter outside the competence of the Ministry of Migration and Asylum.

Homeless shelters

The accessibility of homeless shelters to beneficiaries of international protection in cities remains highly restricted by the persisting lack of available places, coupled with onerous formal requirements for entry. In our experience from contact with homeless shelters in Attica in particular:¹⁷⁶

- ❖ None of the shelters in Athens and Piraeus contacted over the past year in the context of support to people deported from other European countries had readily available accommodation places. Shelters operate waiting lists, most of them long. Lack of accommodation places and substantial waiting times are corroborated by other civil society organisations.¹⁷⁷
- ❖ In addition to requirements of several valid documents e.g. **Residence Permit**, **AFM** and **AMKA**, medical examinations for skin diseases, chest X-ray and a psychiatric evaluation are a prerequisite for access to all shelters. These in turn require an **Active AMKA**.¹⁷⁸

¹⁷⁶ RSA contacted the Multi-Purpose Reception and Solidarity Centre of the Municipality of Athens (Πολυδύναμο Κέντρο Υποδοχής και Αλληλεγγύης του Δήμου Αθηναίων, KYADA), the EKKΑ Social Shelter in Kareas, the Medecins du Monde Dormitory in Athens, the Unesco Shelter in Kaminia, the Unesco Shelter in Nikaia, and the EKKΑ Social Shelter in Rentis. The Red Cross shelter is no longer in operation.

¹⁷⁷ Information provided by Meraki Humanitarian Support, 20 Μαρτίου 2026; Information provided by SolidarityNow, 24 March 2026.

¹⁷⁸ Information provided by SolidarityNow, 24 March 2026.

- ❖ Knowledge of Greek or English is a prerequisite for entry into the shelters, as there are no interpretation services.¹⁷⁹
- ❖ There are no shelters for homeless families with children or for persons with disabilities.¹⁸⁰

As a result of those obstacles, homeless shelters are not an accessible solution for people who are present or return to Greece in a state of homelessness, even for vulnerable groups with acute protection needs. We draw this observation from our experience of representation and systematic monitoring of cases of recognised refugees returned to Greece throughout the past year.

Single man deported from Germany: Farid*, a recognised refugee from Afghanistan, was deported from Germany in February 2026 and has since remained homeless in Greece. In March 2026, in addition to a rejected accommodation request to the RIS, as mentioned above, RSA lawyers approached homeless shelters in Attica to explore accommodation options for Farid* (KYADA, EKKA, Unesco Piraeus, Medecins du Monde). At the time of writing, only EKKA has replied. EKKA noted that there were no available places at present but scheduled an appointment to collect initial information from Farid* with interpretation services secured by RSA. No reply has been received by the remaining shelters.

Single-parent family deported from Germany: Nilab*, a single mother from Afghanistan with four children and a disability certified in Germany, was deported to Greece together with her children at the end of January 2026 after seven years of stay in Germany. Their ADET and travel documents had expired and most had been lost by then. RSA lawyers contacted the Ministry of Migration and Asylum and homeless shelters to request emergency housing for the single-parent family. In February 2026, EMEA informed them that Medecins du Monde had no capacity to admit new entrants in its shelter. In a similar vein, EKKA replied that it had no available place to house the family. RSA has not received a positive response on the family's accommodation request at the time of writing.

Adult siblings deported from Switzerland: Sayed* and **Marzieh***, two siblings from Afghanistan, were deported from Switzerland to Greece in mid-November 2025. Following contact with them, RSA sent written requests for housing to four homeless shelters in Attica (KYADA, EKKA, Medecins du Monde, Unesco Piraeus). None were successful.

Single man deported from Germany: Sultan*, a stateless recognised refugee with a serious medical history and need for psychological support, was deported in August 2025 from Germany to Greece. As stated above, at the end of August 2025, the RIS rejected RSA's accommodation request due to Sultan*'s legal status, while the Secretariat-General for Vulnerable Persons and Institutional Protection replied that it neither implements nor supervises housing programmes for single men. RSA contacted three homeless shelters in Attica (KYADA, EKKA, Unesco Piraeus) in writing and by phone, to no avail.

In a separate case of a single-parent family deported back to Greece and supported by Meraki Humanitarian Support, a public authority advised the mother to relinquish custody of her minor son to the Greek state, since no solution could be found to the issue of their homelessness.¹⁸¹

The chronic saturation of homeless shelters, as systematically documented in our annual reports, has not been mitigated by the **Shelter and Work** (Στέγαση και Εργασία) programme run by

¹⁷⁹ Information provided by Meraki Humanitarian Support, 20 March 2026.

¹⁸⁰ *Ibid.*

¹⁸¹ *Ibid.*

OPEKA,¹⁸² given that participating persons' prospects of moving out of homeless shelters are severely undercut by the absence of affordable housing in large cities.

According to official figures of the Ministry of Social Cohesion and Family, the first call of the programme launched in 2021 had a target population of 556 households and offered accommodation to 564 households, corresponding to 868 people. The second call launched in 2024 has a target population of 897 households and has already covered 856 households. These figures show that the current implementation of the programme has almost been completed.¹⁸³ There are no disaggregated data on the nationality or legal status of people benefitting from the programme. However, a recent Lifo report states that less than 7% of programme beneficiaries were refugees or migrants.¹⁸⁴

The formal documentation requirements for programme, including valid identity documentation, **Tax Clearance Certificate**, a certificate of accommodation in a homeless shelter, a social report from the homeless shelter social worker, pose extremely onerous a threshold for entry in the programme.¹⁸⁵ None of the beneficiaries of international protection assisted by RSA, the Greek Council for Refugees or SolidarityNow have entered this programme.¹⁸⁶

Homelessness and precarious living conditions

There are no conclusive or official statistics on homeless persons in Greece, let alone on the specific number of homeless beneficiaries of international protection in particular. A recent Lifo on the broader situation of homelessness in Greece states the following: “Nowadays, in Athens neighbourhoods, people sleep inside cars following eviction or chronic inability to pay rent. Meanwhile, a new generation of working homeless is emerging: people who have work but no home. Next to them, another silent majority: people with disabilities who spend the night on the pavement, almost excluded from existing facilities, and a dramatic increase in elderly people on the city streets. The last documentation of homeless people in the municipality of Athens was done in 2018 by Panteion University. The number and profile of homeless people are evolving in inevitable connection to the socio-economic reality.”¹⁸⁷

Homelessness and extreme precarity are a near-automatic adjunct to deportations of recognised refugees to Greece from other European countries, regardless of gender, nationality or profile and including single-parent families with children, LGBTI+ persons and persons with serious health conditions. This is confirmed by RSA's experience of representation of at least 50 people deported

¹⁸² Article 15 L 4756/2020, Gov. Gazette A' 235/26.11.2020; JMD 1301/2024, Gov. Gazette B' 4766/20.08.2024, as amended by JMD 8181/2024, Gov. Gazette B' 7118/27.12.2024. See also OPEKA, *Πρόγραμμα Στέγαση και Εργασία για αστέγους*, available [here](#).

¹⁸³ Ministry of Social Cohesion and Family, Reply to parliamentary question, 1422/2026, 22 January 2026, available [here](#).

¹⁸⁴ Lifo, 'Άστεγοι της Αθήνας: Ποιοι είναι και ποιος νοιάζεται;', 6 February 2026, διαθέσιμο [εδώ](#).

¹⁸⁵ Article 4 JMD 1301/2024.

¹⁸⁶ Information provided by the Greek Council for Refugees, 26 February 2026; Information provided by SolidarityNow, 24 March 2026. Meraki Humanitarian Support is aware of only one case of a family residing in a shelter for victims of gender-based violence: Information provided by Meraki Humanitarian Support, 20 March 2026.

¹⁸⁷ Lifo, 'Άστεγοι της Αθήνας: Ποιοι είναι και ποιος νοιάζεται;', 6 Φεβρουαρίου 2026.

or returning to Greece from the beginning of 2025 to present. In the overwhelming majority of cases we supported, these people ended up on the streets, in squares or in underground tunnels in cities or in “invisible homelessness”¹⁸⁸ under precarious conditions of informal rental of places in overcrowded apartment rooms, at a substantial financial cost. In many cases, refugees who resorted to conditions of informal rental have found themselves again on the streets due to their inability to cover the rent or due to threats to their security and integrity.¹⁸⁹

Single woman deported from Germany: Mariella*, a recognised trans refugee from Iran, was deported from Germany to Greece in mid-April 2025. In her words, “The day I was deported from Germany, I had no money and no place to go. I went to a police station in central Athens and asked for help. I said, ‘What should I do now as a homeless trans woman standing in front of you?’ They only told me to renew my ID. Nothing else. I travelled to Patras to look for an old friend, the only person I knew, hoping he could give me shelter. I couldn’t find him and returned to Athens with no money left. I went to an informal hostel, a “mosaferkhana”, where many people sleep in shared rooms for 10 euros a night. That night, three or four men tried to rape me. I screamed and the owner knocked on the door and helped me. In the morning I left because I wasn’t safe. After that, I had to sleep outside. It is very difficult for a woman to sleep rough in Athens, however there are many women and trans women sleeping on the streets. For some time, I slept in a park in central Athens. One night, some men attacked me and tried to steal my documents and phone. I shouted and a woman came running; they escaped. After that, I slept for two weeks in a pedestrian tunnel under a main street, with no lights. I would wake up at every sound.”

Single-parent family deported from Germany: Nilab*, a single mother from Afghanistan with four children and a disability certified in Germany, was deported to Greece together with her children at the end of January 2026 after seven years of stay in Germany. As stated above, housing requests to the authorities and to shelters for the family were unsuccessful. When the family sought informal rental in Athens, they were asked to pay 50 € per night, i.e. 10 € for each family member.

Importantly, in light of the objective limitations to the registration of homeless people, who must be located by the KYADA Street Work Team to be registered and granted a homelessness certificate, the people we support following deportation or return to Greece from other European countries have no **Proof of Residence Address** and are unable to access public services such as AADE, EFKA or even the Asylum Service, as analysed in the **Essential Documents** section.

Finally, we note that a previous report prepared by Immigration Policy Lab, ETH Zurich and University College London refers to a sample of 3,755 survey respondents, of whom 3% reported to be homeless. The report mentions that the group of respondents was selected from a “representative sample” drawn from the UNHCR *proGres* database in its November 2021 form. The report also mentions that 96% of the respondents have lived in Greece for more than two years. We note that against the backdrop, these results cannot be applied to the situation of beneficiaries of international protection returning to Greece from other Member States.

¹⁸⁸ European Anti-Poverty Network (EAPN), *Greece: Towards a Systemic Approach to Social Protection*, October 2024, 24, available [here](#).

¹⁸⁹ RSA, ‘International Women’s Day 2026: “But still, like dust, I’ll rise”’, 5 March 2026, available [here](#).

Employment

Greek law provides that beneficiaries of international protection are entitled to equal treatment to Greek citizens as regards access to employment.¹⁹⁰ Access to employment is conditioned on prior registration with EFKA and issuance of **AMA**. This in turn requires a valid **Residence Permit, AFM, AMKA**, as well as **Proof of Residence Address** in practice.

We do not have up-to-date information on the implementation of state programmes aimed at strengthening access of refugees to the labour market.

We stress, however, that the serious funding restrictions in the area of asylum from 2025 onwards have had inevitable impact on the capacity of international organisations and civil society to continue implementing actions supporting refugees' access to employment, among other services. For instance, UNHCR states that it no longer offers job counselling to refugees in island camps such as CCAC Kos and Leros.¹⁹¹

¹⁹⁰ Article 26(1) Asylum Code.

¹⁹¹ European Commission, *DG HOME Mission Report: Kos and Leros, 10-14 November 2025*, Ares(2025)358610, November 2025.

Health care

Formal requirements for access to health care

EU law provides that beneficiaries of international protection are entitled to access to health care under the conditions applicable to Greek nationals.¹⁹² Under Greek law, namely Article 33 L 4368/2016, uninsured persons enjoy free-of-charge access to public health facilities and to hospitalisation and health care, in principle upon condition of holding an **Active AMKA**.¹⁹³ Uninsured persons with an active AMKA have access to free-of-charge health care and prescription of medication or examinations only in public facilities, not before private medical professionals.

In light of the above, the obstacles imposed by the AMKA Regulation on AMKA activation for beneficiaries of international protection since 2024 have direct, inevitable impact on their access to health care as well, as confirmed by the European Commission.¹⁹⁴ Refugees who have not already secured lawful employment and who cannot produce a work contract or recruitment certificate from an employer, uploaded in ERGANI, have no active AMKA and are excluded even from absolutely vital treatment in Greece, as they objectively cannot be prescribed free-of-charge medication or examinations unless an active AMKA is inserted into the IDIKA database.

Specifically, for people holding an active AMKA, public health institutions adjust the patient's share of contribution to the costs of treatment or service e.g. medical examinations. The prescription form expressly states that the person belongs to the category of "Beneficiaries of Article 33 L 4368/2016". In the case of an inactive AMKA, however, the prescription may only be issued with full coverage of the costs of medication or examination by the patient, and bears the mention "Inactive AMKA".

The barrier set by inactive AMKA cannot be overcome, despite the fact that Article 33 L 4368/2016 expressly cites beneficiaries of international protection as one of the vulnerable groups for which access to free-of-charge health care without an active AMKA is to be regulated through secondary legislation.¹⁹⁵ There are no regulations in place beyond the AMKA Regulation which states that AMKA can only be activated with a work contract or recruitment certificate in the case of third-country nationals.

¹⁹² Article 30 Qualification Directive; Article 31 Qualification Regulation; Article 30 Asylum Code. See also Ministry of Health, Circular Γ26/οικ.48556 «Πρόσβαση δικαιούχων του ν. 4368/2016 στις δημόσιες δομές υγείας», 3 November 2025, available [here](#).

¹⁹³ Article 33(1) and (3) L 4368/2016, Gov. Gazette A' 21/21.02.2016, as amended by Article 15 L 5102/2024, Gov. Gazette A' 55/13.04.2024.

¹⁹⁴ European Commission, 'Implementation of new law on AMKA and its repercussions on Beneficiaries of International Protection and legally residing third-country nationals', Ares(2024)8316809, 22 November 2024.

¹⁹⁵ Article 33(2), (3) and (5) L 4368/2016. Beneficiaries of international protection are cited in Article 33(2)(ix) L 4368/2016.

In November 2025, the Ministry of Health issued a circular listing the documentation requirements to be met by the above vulnerable groups of uninsured people so as to have access to health care where they do not hold an active AMKA. This circular, however, has been wholly ineffective in addressing the barriers set by the AMKA Regulation. On the contrary, instances of denial of health care to beneficiaries of international protection with an inactive AMKA intensified after the adoption of the circular.¹⁹⁶

On the one hand, the circular requires beneficiaries of international protection to produce documents that are virtually impossible to obtain. The circular expressly states that the condition for access of beneficiaries of international protection to health care without an active AMKA is a “Written certificate of postponement of removal decision pursuant to the provisions of Article 24(4) L 3907/2011”.¹⁹⁷ This is a document issued by the Hellenic Police to persons subject to deportation from Greece.

As highlighted by the Greek Ombudsman, “the reference of the Circular... to a postponement of removal certificate issued by the Hellenic Police only causes confusion, since beneficiaries of international protection are not under return and postponement of removal proceedings, but rather hold a residence permit”.¹⁹⁸

The inability of recognised refugees lawfully residing in Greece to obtain a postponement of removal certificate is confirmed in cases represented by RSA, where the document in question was requested by both the Police and the Ministry of Health, to no avail:¹⁹⁹

¹⁹⁶ Ombudsman, ‘Ιατροφαρμακευτική περιθαλψη δικαιούχων διεθνούς προστασίας – Ανεργό Α.Μ.Κ.Α’, 385955/13692/2026, 20 February 2026.

¹⁹⁷ The provision in question had already been repealed and replaced by Article 10(4) L 5226/2025 at the time of adoption of the circular.

¹⁹⁸ Ombudsman, ‘Ιατροφαρμακευτική περιθαλψη δικαιούχων διεθνούς προστασίας – Ανεργό Α.Μ.Κ.Α’, 385955/13692/2026, 20 February 2026.

¹⁹⁹ RSA, ‘EFKA ignores binding ECtHR interim measures decision’, 26 February 2026, available [here](#); ‘ECtHR interim measures secure access to medication for recognised refugee with serious health condition and inactive AMKA in Greece’, 20 February 2026.

ECtHR interim measures for a young woman with a disability and chronic illness: Zakiya*, a young recognised refugee from Syria, suffers from a disability and serious chronic illness that renders access to regular hospitalisation and medication vital for her health. She has received such treatment in a hospital in Athens from her arrival in Greece in the fall of 2024. After she received a **Residence Permit**, the PAAYPA she held as an asylum seeker was deactivated in January 2026 and she required an **Active AMKA** to continue her treatment. Zakiya* had to reach the European Court of Human Rights (ECtHR) to be able to continue receiving the necessary medication for her survival (*Omar v. Greece*, 4827/26).

Specifically, after Zakiya* was informed by the hospital in mid-January 2026 that there was an issue with the continuation of her treatment due to AMKA, RSA lawyers requested a “postponement of removal certificate” from the Aliens Directorate of Attica of the Hellenic Police and stressed that Zakiya* needed the document to continue her treatment without an active AMKA pursuant to the Ministry of Health circular. The Police replied that it is unable to issue a “postponement of removal certificate” to Zakiya* because she is a recognised refugee with lawful residence in Greece.

That same month, RSA lawyers sent a query to the Ministry of Health on how a “postponement of removal certificate” can be issued to a recognised refugee, since the Police is unable to grant it. The Ministry of Health replied that it is not competent to issue the document, nor can it provide instructions on its issuance.

Only after an interim measures decision of the ECtHR in mid-February and after repeated, often unsuccessful contacts with services that declared themselves non-competent on the matter, did the Greek authorities activate Zakiya*'s AMKA – just in early March – and was she able to continue her needed treatment.

The impossibility to issue a postponement of removal certificate to a beneficiary of international protection is also confirmed in cases of people deported to Greece from other European countries.

Adult siblings deported from Switzerland: Sayed* and **Marzieh***, two siblings from Afghanistan, were deported from Switzerland to Greece in mid-November 2025. At the end of the month, RSA wrote to the Aliens Directorate of Attica of the Hellenic Police to request a certificate of postponement of removal decision for Marzieh* ahead of a medical appointment. The Police replied as follows: “We inform you that your client is a recognised refugee. As a result, her stay on Greek territory is lawful. Therefore, no postponement of removal certificate is issued”. When she attended her scheduled appointment, Marzieh* was not able to receive a prescription for medication, since she lacked an **Active AMKA**.

Nevertheless, even as of mid-February 2026, the Ministry of Health repeated that refugees have access to health care upon condition they produce a certificate of postponement of removal decision pursuant to the November 2025 circular.²⁰⁰

On the other hand, access to care without an **Active AMKA** is impossible even for other categories of uninsured persons listed in the November 2025 circular of the Ministry of Health. This includes as persons with disabilities,²⁰¹ who are required under the circular to produce a disability certification

²⁰⁰ Ombudsman, 'Ιατροφαρμακευτική περίθαλψη δικαιούχων διεθνούς προστασίας – Ανενεργό Α.Μ.Κ.Α.', 385955/13692/2026, 20 February 2026.

²⁰¹ Persons with disabilities are cited in Article 33(2)(viii) L 4368/2016.

or a medical certificate from a public health institution. That is given that “For inactive AMKA, the IDIKA system does not contain any field permitting entry of the patient into any of the exceptions of Article 33 L 4368/2016”, as put by the Ombudsman.²⁰² We also recall that no application for disability certification can be submitted without an active AMKA.

ECtHR interim measures for a young woman with a disability and chronic illness: In the case of **Zakiya***, as described above, RSA lawyers also referred to the Greek authorities to inquire into the possibility for her to access care based on the category of persons with disabilities provided in the Ministry of Health circular, to no avail. In mid-February 2026, RSA lawyers asked the Ministry of Health how medication can be prescribed and granted to persons with disabilities who hold a medical certificate as required by the Ministry circular, without an **Active AMKA**. The Ministry of Health replied as follows: “we inform you that the issuance and activation of AMKA do not fall within the responsibility of our service”.

No earlier than mid-March 2026 did we receive information that IDIKA transmitted instructions for activation of a new entry titled “Persons with inactive AMKA who belong to vulnerable social groups”, with a view to enabling health care to beneficiaries of international protection with an inactive AMKA. The entry in question seems to appear in the digital systems of public health institutions.²⁰³ At the time of writing, however, there has not been any official or public announcement from IDIKA or from other authorities on the matter.

Practical barriers to access to health care

We reiterate our observations from previous reports regarding the serious repercussions of the language barrier in the area of health care. Appointments with the Greek public health system are scheduled via the 1566 telephone number,²⁰⁴ available only in Greek and English. People who do not speak either language therefore have no possibility of direct access to public health institutions for the purpose of booking a medical appointment. In addition, inconsistent practice is witnessed in the services offered by the 1566 line, including conflicting replies by the services as regards the availability of medical appointments. Waiting times for appointments may reach six months for certain medical specialties.²⁰⁵

Moreover, public hospitals in Attica continue to face critical gaps in interpretation services to enable communication with patients,²⁰⁶ except for limited cases of assistance.²⁰⁷

Serious obstacles are also documented in relation to access to mental health services. These include waiting times reaching several months for appointments in psychiatric wards of public institutions, lack of regular follow-up beyond provision of medication or lack of specialised

²⁰² Ombudsman, ‘Ιατροφαρμακευτική περίθαλψη δικαιούχων διεθνούς προστασίας – Ανενεργό Α.Μ.Κ.Α’, 385955/13692/2026, 20 February 2026.

²⁰³ Information provided by Meraki Humanitarian Support, 20 March 2026.

²⁰⁴ The 1566 telephone line replaced the 1535 telephone line in July 2025: <https://1566.gov.gr/>.

²⁰⁵ Information provided by SolidarityNow, 24 March 2026.

²⁰⁶ Information provided by Meraki Humanitarian Support, 20 March 2026.

²⁰⁷ Information provided by SolidarityNow, 24 March 2026.

accommodation facilities for people with mental health needs.²⁰⁸ The homelessness conditions facing refugees, namely those returned to Greece from other countries, have an aggravating effect on mental health conditions.²⁰⁹

²⁰⁸ *Ibid.*

²⁰⁹ Information provided by Meraki Humanitarian Support, 20 March 2026.

Support for access to rights

The various systemic deficiencies hindering access to the rights attached to international protection status are largely owed to legislative and administrative barriers in Greece e.g. prohibitive requirements for **AMKA** activation, insufficient state capacity to process renewals of **Residence Permits** and **Travel Documents**, arbitrary exclusion from most forms of **Social Welfare**. These barriers are directly attributed to the Greek state and are thereby not liable to be overcome by beneficiaries regardless of personal efforts or of any informal support they may be presumably able to seek, including from civil society organisations, from acquaintances or from members of refugee communities.

On the contrary, the inability to access documents and rights is exacerbated by chronic gaps in information and assistance to refugees, as well as by the ineffectiveness of domestic remedies in redressing breaches of relevant rights. These barriers are all the more potent in the case of people deported from other European countries without any safeguard of dignified living, many of them after several years of absence from Greece.

Information & assistance

Insufficient and inaccurate information upon grant of status

Upon notification of a positive decision on the asylum application, the Asylum Service provides beneficiaries of international protection with a standardised information sheet on their rights and obligations. This leaflet does not accurately depict the legal framework and the necessary administrative procedures. For example, the leaflet:

- ❖ States that beneficiaries of international protection have access to **Health Care** and to **Social Welfare** "under the same conditions as those applicable to Greek nationals", without explaining the additional requirements imposed by Greek law on third-country nationals for the purpose of activation of **AMKA**, needed for the above.
- ❖ States in relation to AMKA: "To issue a Social Security Number (AMKA), you will have to appear before a KEP (see list here) within thirty (30) days from the day of collection of your residence permit (ADET)", even though many KEP have stopped offering this service. No mention is made to the documents required for AMKA activation.

In other cases, the Asylum Service sends beneficiaries a link to an October 2023 information guide published by the Ministry of Migration and Asylum and UNHCR on the rights and obligations of beneficiaries of international protection.²¹⁰ The guide has not been updated since and does not accurately depict the legal framework and applicable procedures. For instance:

²¹⁰ Ministry of Migration and Asylum & UNHCR, *Οδηγός Πληροφόρησης για Δικαιούχους Διεθνούς Προστασίας*, October 2023, available [here](#).

- ❖ The guide refers beneficiaries to the EFKA website for the purpose of booking an appointment to obtain **AMKA**. Access to the website requires prior possession of both **TAXISnet Credentials** and AMKA, however.
- ❖ The guide does not mention the AMKA activation conditions and does not inform beneficiaries that they cannot obtain an active AMKA without a work contract or recruitment certificate uploaded on ERGANI.
- ❖ The guide does not mention the obligation to connect AMKA with AFM and the consequences of omitting this process.
- ❖ The guide does not inform beneficiaries of the obligation to update their details in AADE records when they receive their first **Residence Permit** – it only mentions this obligation in the case of ADET renewal.

Lack of information upon return to Greece

As a rule, readmission of beneficiaries of international protection from other European countries takes place via Athens International Airport. Upon arrival at the airport, beneficiaries are briefly detained by Hellenic Police authorities for identification purposes and are usually released after a few hours. There are still no interpreters at the airport to facilitate communication of the persons concerned with the Hellenic Police, even for Arabic or Farsi. Upon release, beneficiaries receive no information on housing options or on procedures for access to their rights in Greece.

From the beginning of 2025 to present, RSA has represented at least 50 recognised refugees deported or returned to Greece from other European countries e.g. Germany, Switzerland, Sweden. None of them received any information, document or leaflet in Greek or in another language upon arrival at Athens International Airport or any information on the competent services they should approach e.g. to issue, retrieve or renew **Essential Documents**. In SolidarityNow's experience, the majority of people returned to Greece do not have their ADET or travel document in their possession, as these are either lost or withheld by the country of deportation.²¹¹

Returnees are not offered housing or financial or other forms of assistance upon arrival in Greece. In our experience, they end up in **Homelessness & Precarious Conditions** almost automatically after return.

We recall that some returnees who may have received asylum in Greece several years ago, prior to the establishment of certain Offices and Units of the Asylum Service, may encounter further obstacles owed to ambiguities as to the competent RAO or AAU to which they should refer.

We place particular emphasis on the predicament of beneficiaries of international protection returned to Greece from other countries with **Withheld Documents** by the authorities of the country of deportation. These people are faced with a general absence of clear and uniform procedures across involved Greek authorities, leading them to several months of delays in retrieving their identity documents or even to pressure to report loss of documents they have not in fact lost.

²¹¹ Information provided by SolidarityNow, 24 March 2026.

Restricted access to public services

Contact with authorities responsible for different services remains difficult in practice for those beneficiaries of international protection who do not wield the Greek language. We note, for instance, that appointments with EFKA are booked via the 1555 telephone line available only to Greek or English speakers. The same applies to the 1566 telephone line for access to the public health care system. As for AADE, access to the authority requires [TAXISnet Credentials](#) and navigation of a website available only in Greek.

In the experience of RSA and of other civil society organisations in Greece, the above public services continue to be poorly acquainted with the legal framework governing their engagement with beneficiaries of international protection. This leads to frequent, widespread instances of refusal to service people who in fact fulfil the conditions for obtaining requested documents. In practice, people have to rely, as a rule, on support and intervention from a lawyer, an accountant or a social worker even for basic, yet necessary administrative procedures such as issuance of [AMKA](#), update of personal details in AADE records or even facilitation of physical access to the Asylum Service for the purpose of collecting or renewing documents. The need for such support is not limited to booking appointments with public services that cannot be requested by people who do not speak Greek or English. It extends in practice to drafting notes to the attention of public officials so as to clarify the requirements set by law, uninterrupted communication – either by phone or in person – with refugees when they appear before services, and management of often persistent refusal of services to discharge their duties in accordance with the law, without any certainty that people will ultimately be serviced.²¹² In many cases, people are driven to private offices for these procedures and end up paying exorbitant amounts for processes that should be carried out free-of-charge.²¹³

In addition, authorities such as AAU Beneficiaries of International Protection of the Asylum Service, responsible for the renewal of [Residence Permits](#) and [Travel Documents](#), are largely inaccessible even to beneficiaries of international protection who are supported by a lawyer. Written requests sent via email are replied to with significant delay or met with requests for public authority certification on the authorisations of refugees who do not have a valid ADET in their possession.

Helpdesk for social integration

The Ministry of Migration and Asylum operates a [Help Desk for Social Integration](#) which may be used by beneficiaries of international protection seeking answers to specific questions on integration-related matters.

Based on cases represented by RSA, however, said Helpdesk still appears not to answer beneficiaries' queries in a way that offers them accurate and effective information and guidance to navigate the different procedures and bureaucratic hurdles described in this report. Recent

²¹² Information provided by Meraki Humanitarian Support, 20 March 2026.

²¹³ *Ibid.*

replies received from the Helpdesk include examples of insufficient and/or misleading information as follows:

Single man deported from Germany: Hamid*, a recognised refugee from Afghanistan, was deported from Germany at the end of September 2025 without being given back his valid ADET and travel document from the German authorities, as mentioned above. It took three months and multiple interventions for him to retrieve his documents. At the end of January 2026, Hamid* contacted the Helpdesk of the Ministry of Migration and Asylum to request information on how to activate his AMKA as an unemployed, homeless recognised refugee. He was not able to receive adequate information and guidance.

28 Jan 2026 Hamid* explains that he has been deported from Germany, that he is homeless and unemployed, that he has an inactive **AMKA** and lacks a work contract or recruitment certificate to activate his AMKA so as to request **Guaranteed Minimum Income**. He asks: "How can I activate my AMKA as an unemployed, homeless recognised refugee?" The Helpdesk replies to the query as follows: "You can obtain AMKA by appearing before the special AMKA offices of EFKA in your area."

29 Jan 2026 Hamid* reverts as follows: "as mentioned in my request, I already have an AMKA which is inactive... My request relates to activation of my AMKA, which is necessary for me to request EEE. Kindly inform me how I can activate my aforementioned AMKA as an unemployed and homeless recognised refugee." The Helpdesk erroneously responds as follows: "The number you have is not AMKA but PAAYPA. The conversion of PAAYPA into AMKA is carried out following the issuance of the Beneficiary of International Protection residence permit. The beneficiary of international protection must request the change within 30 days from the collection of the residence permit. It appears you have not completed the process, therefore you now must refer to EFKA in your area to issue AMKA."

30 Jan 2026 Hamid* sends another clarification, stating: "As I already mentioned, I have already converted my PAAYPA into AMKA (attached) but AMKA is inactive because I do not have a work contract or recruitment certificate on ERGANI. I cannot request EEE because my AMKA is not active. Kindly inform me how I can activate it as an unemployed recognised refugee." The Helpdesk replies: "Unfortunately, in order to activate your AMKA you will need to possess one of the employment documents you mention, meaning that you will have to have found work. And yes, as you correctly state, you cannot submit an application for Guaranteed Minimum Income without an active AMKA."

Migrant Integration Centres (KEM)

Migrant Integration Centres (*Κέντρα Ένταξης Μεταναστών*, KEM) existing in selected municipalities provide services to persons residing within the boundaries of their respective municipalities. The KEM of Athens Municipality, for instance, is not open to people residing in neighbouring municipalities in the Attica region. People residing outside the Athens Municipality or whose details on EFKA indicate an address outside Athens Municipality may only refer to the respective Community Centres (*Κέντρα Κοινότητας*) of their municipal authorities which are not equipped at all with interpreters and are not specialised in refugee integration matters.

There are 22 KEM across Greece according to the Ministry of Social Cohesion and Family.²¹⁴ The Attica region has three KEM: Athens, Kallithea and Piraeus.²¹⁵ The KEM of Athens offers services only to persons speaking Greek, English, Urdu and Farsi.²¹⁶ The KEM of Kallithea is only available to Ukrainian temporary protection holders.²¹⁷ The KEM of Piraeus was financially supported under 2014-2020 programming and it is not clear whether its operation continues at the time of writing.²¹⁸

We are not aware of any mobile teams operated by any of the KEM and have not received any such information in the context of our engagement with public services to date.

Absence of effective remedies

Greek law does not foresee a specific remedy to beneficiaries of international protection against instances where their rights are not guaranteed.²¹⁹ They may therefore only invoke general rules of administrative law which offer no effective remedy to enforce rights attached to international protection status.

The application for judicial review (*αίτηση ακύρωσης*) or appeal (*προσφυγή ουσίας*) before the administrative courts against acts or omissions of the administration is an ineffective remedy as it requires an individual administrative act or omission (*παράλειψη οφειλόμενης ενέργειας*) by an administrative authority. This would not apply to cases such as access to **Housing**, failure to afford **Health Care** or delays in the issuance of **Essential Documents**. Moreover, judicial review offers review on points of law and not fact. General administrative law remedies do not carry automatic suspensive effect, while interim measures under a suspension request (*αίτηση αναστολής*) are not allowed in cases concerning omissions of state duties. In short, an application for judicial review cannot enjoin the Greek administration to provide documents or socio-economic rights to a beneficiary of international protection.

For its part, the compensation claim (*αγωγή αποζημίωσης*) against acts or omissions of the state²²⁰ is equally ineffective a remedy, as it only entitles the claimant to financial compensation and not redress with regard to the rights denied. Here too, the claimant cannot apply for interim measures.

²¹⁴ Ministry of Social Cohesion and Family, Reply to parliamentary question, 1032/2026, 15 January 2026, available [here](#).

²¹⁵ Ministry of Migration and Asylum, *Κέντρα Ένταξης Μεταναστών*, available [here](#).

²¹⁶ Municipality of Athens, *Κέντρο Ένταξης Μεταναστών*, available [here](#).

²¹⁷ Municipality of Kallithea, *Κέντρο Κοινότητας με Παράρτημα Κέντρου Ένταξης Μεταναστών*, available [here](#).

²¹⁸ Municipality of Piraeus, *Κέντρο Κοινότητας*, available [here](#).

²¹⁹ With the exception of the administrative appeal before the Director of the Asylum Service against decisions refusing a **Travel Document**: Article 4(3) TDV Regulation, and the administrative appeal before OPEKA against decisions refusing **Guaranteed Minimum Income**: Article 13 EEE Regulation.

²²⁰ Article 105 Introductory Law to the Civil Code, L 2783/1941.

Finally, Greek administrative courts face slow processing times and one of the highest backlogs in the EU.²²¹ In our experience, the adjudication of judicial review applications or compensation claims at first instance may take three to five years.

Accordingly, we maintain our established position that there is no effective remedy in Greece available to beneficiaries of international protection who have suffered even undignified or inhuman and degrading treatment stemming from denial of socio-economic rights and extreme material deprivation. This includes persons returned from other European countries. We are not aware of any court rulings in judicial review or compensation proceedings regarding denial of rights of beneficiaries of international protection.

²²¹ European Commission, *2025 Rule of Law Report Country Chapter Greece*, SWD(2025) 908, 8 July 2025, 6.



<https://rsaegean.org/en/recognised-refugees-in-greece-2026>



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