# JANUARY 2025

Submission to the Committee of Ministers of the Council of Europe in the cases of M.S.S. v. Belgium and Greece & Rahimi v. Greece

# 14 YEARS AFTER M.S.S.: REPORT ON HUMAN RIGHTS, ACCESS TO ASYLUM AND DETENTION CONDITIONS IN GREECE

Joint submission by I Have Rights, Mobile Info Team and Equal Legal Aid







Have Rights (IHR) is a non-profit refugee law clinic on Samos. Since beginning operation in March 2022, IHR has provided legal counselling and representation to nearly 1,000 asylum seekers and provided legal information to around 2,000 people through their information hotline. IHR closely monitors and documents human rights violations against asylum seekers on Samos, and in particular has published various reports on the Samos Closed Controlled Access Centre (CCAC) [1]. IHR engages in advocacy and strategic litigation, including with stakeholders at the Council or Europe, EU and UN [2]. IHR is a member of the Border Violence Monitoring Network (BVMN) [3].

Mobile Info Team (MIT) is a non-profit organisation based in Thessaloniki that provides information and assistance to people throughout all stages of asylum and related procedures across Greece. Beginning operations in 2016, MIT has provided vital information to up to 9,000 individuals per year through hotlines available in six languages. Its legal team offers in-depth support in a wide range of legal matters, including issues related to integration and the Dublin Regulation. Additionally, MIT advocates for changes to the asylum system in Greece by engaging with stakeholders at a European Union and international level. Based on its work in Greece, MIT has published numerous reports on the lack of access to asylum [4], immigration detention centres [5] as well as on the situation of asylum seekers and beneficiaries of international protection with regard to living conditions, integration, and risk of destitution [6]. MIT is a member of the BVMN.

**Equal Legal Aid (ELA)** is a non-profit organisation based in Thessaloniki providing pro bono legal assistance and representation to asylum seekers during their asylum procedures in northern Greece. Since beginning its operation in September 2020, ELA has provided individual legal support and representation to 1,500 people. Representation is provided at all stages of the asylum procedure, including on appeal and before administrative Courts [7]. To tackle the challenges linked to the isolation of applicants in remote facilities, ELA also manages a hotline, through which 1,750 people have received guidance on asylum procedures since January 2022.

<sup>1.</sup> See for example: I Have Rights. 2023. The EU-Funded Closed Controlled Access Centre - The De Facto Detention of Asylum Seekers on Samos. Available <a href="https://example.com/here;">here;</a> I Have Rights. 2023. "They are killing minds"- Life in the Samos Closed Controlled Access Centre. Available <a href="https://example.com/here;">here;</a> I Have Rights. 2023. "They are killing minds"- Life in the Samos Closed Controlled Access Centre. Available <a href="https://example.com/here;">here;</a> I Have Rights. 2023. "They are killing minds"- Life in the Samos Closed Controlled Access Centre. Available <a href="https://example.com/here;">here;</a> I Have Rights. 2023. "They are killing minds"- Life in the Samos Closed Controlled Access Centre. Available <a href="https://example.com/here;">here;</a> I Have Rights. 2023. "They are killing minds"- Life in the Samos Closed Controlled Access Centre. Available <a href="https://example.com/here;">here;</a> I Have Rights. 2023. "They are killing minds"- Life in the Samos Closed Controlled Access Centre. Available <a href="https://example.com/here;">here;</a> I Have Rights. 2023. "They are killing minds" - Life in the Samos Closed Controlled Access Centre. Available <a href="https://example.com/here;">here;</a> I Have Rights. 2023. "They are killing minds" - Life in the Samos Closed Controlled Access Centre. Available <a href="https://example.com/here;">here;</a> I Have Rights and Availa

<sup>2.</sup> See for example: I Have Rights and the Border Violence Monitoring Network. 2023. Third Party Intervention to the European Court of Human Rights in *A.B. v Greece* and *D.G. v Greece*. Available <a href="https://example.com/here;">here;</a> I Have Rights and the Border Violence Monitoring Network. 2023. Policy Brief to MEPs on evidence of Aegean pushbacks. Available <a href="here;">here;</a> I Have Rights and the Human Rights Legal Project. 2023. GREVIO evaluation report on the implementation of the Council of Europe convention on preventing and combating violence against women and domestic violence. Available <a href="here;">here;</a> I Have Rights and the International Rescue Committee. 2023. Contribution to EU Ombudsman Consultation: Samos Closed Controlled Access Centre breaks EU human rights standards. Available <a href="here;">here;</a> I Have Rise and Still I Rise. 2022. Greece's Compliance with the Convention on the Rights of the Child Additional Submissions Report for the 90th Session of the Committee on the Rights of Child. Available <a href="here;">here.</a>

<sup>3.</sup> The Border Violence Monitoring Network (BVMN) is a network of non-governmental organisations situated along the Balkan and Greek migration route, whose purpose is to monitor, document and litigate human rights violations at European borders.

<sup>4.</sup> Mobile Info Team. 2023. Protection Unavailable: Dysfunctional Practices and Restrictions on the Right to Asylum. Available <a href="https://hexamble.com/here">here</a>; Mobile Info Team. 2021. Lives on Hold: Access to asylum on mainland Greece, Crete and Rhodes. Available <a href="here">here</a>; Mobile Info Team. 2022. Blocked from the system. Voices of people excluded from the asylum system on mainland Greece, Crete and Rhodes. Available <a href="here">here</a>; Mobile Info Team. 2022. Control and Containment: Changes in access to asylum on mainland Greece, Crete and Rhodes. Available <a href="here">here</a>.

<sup>5.</sup> Mobile Info Team. 2023. "Prison for Papers": Last Resort Measures Used as Standard Procedure. Available here.

<sup>6.</sup> Mobile Info Team. 2021. The living conditions of applicants and beneficiaries of International Protection. Available <a href="https://example.com/html/>here">here</a>.

<sup>7.</sup> Since 2021, ELA's lawyers lodged 104 appeals before the Appeals Committees, submitted 96 requests for annulment and 73 requests for provisional measures. More information is available online.

## INTRODUCTION

On 1 August 2024, I Have Rights (IHR), Mobile Info Team (MIT) and Equal Legal Aid (ELA) submitted a communication to the Committee of Ministers (CM) of the Council of Europe to assist in the supervision of the implementation of the *M.S.S. v. Belgium and Greece* and *Rahimi v. Greece* cases [8]. The submitting organisations presented evidence on the situation in Greece in relation to access to asylum procedures and legal assistance, the living conditions of asylum seekers, safeguards for vulnerable individuals, and the conditions in administrative detention facilities. This evidence was obtained through our work providing legal aid and information to asylum seekers, refugees and migrants on mainland Greece and the Aegean island of Samos.

On 20 August 2024, the Greek Government submitted a communication to the CM, providing information on the situation of asylum seekers in Greece as well as third country nationals and asylum seekers detained in pre-removal facilities, and details on the Government's plans for improvements in the asylum system and detention facilities [9]. In its communication to the CM, the Greek Government relies on data pertaining to the situation in Greece as of the end of June 2024.

In this submission to the CM, the submitting organisations provide additional information on the current deficiencies in living conditions of asylum seekers in Greece and access to the asylum procedure on both the mainland and Samos island, a situation which we believe has worsened significantly since June 2024. The existing gaps in essential services highlighted in our August 2024 communication have been exacerbated by the authorities' poor response to the slight increase in asylum seekers to the Aegean islands in 2024 compared with the previous year [10] and the resulting increase of official transfers from the islands to the mainland, resulting in mainland accommodation facilities reaching near full capacity [11]. Additionally, we present evidence on the poor conditions in pre-removal facilities on the Greek mainland, which persist 14 months following the visit of the Council of Europe Committee for the Prevention of Torture to Greece in November 2023 [12]. Given these troubling continuities, we respectfully request that the case is scheduled for examination at the Committee's earliest possible convenience.

## 1. ASYLUM PROCEDURES

## a. Length of asylum procedures

In its communication to the CM, the Greek Government states that, during 2023, digitalisation of asylum procedures resulted in "enhanced [...] efficiency and quality of asylum processes and led to the reduction of the time needed for the examination of applications both at first instance and on appeal and the improvement of the quality of interviews [...] Currently the average time to complete the examination of an asylum application both at first and second instance is approximately 3 months".

<sup>8.</sup> Secretariat of the Committee of Ministers. 2024. Communication from NGOs (I Have <u>Right</u>s, Mobile Info Team, Equal Legal Aid) (01/08/2024) concerning the M.S.S. group of cases v. Greece. Available here.

<sup>9.</sup> Secretariat of the Committee of Ministers. 2024. Communication from Greece concerning the group of cases of M.S.S. v. Greece. Available <u>here</u>.

<sup>10.</sup> UNHCR. Europe Sea arrivals / Greece. Available here.

<sup>11.</sup> Hellenic Ministry of Migration. 2024. Report A November 2024. Available here.

<sup>12.</sup> UNHCR. 2023. Report to the Greek Government on the visit to Greece carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT). Available here.

We reiterate that delays in processing asylum claims remain a chronic issue in Greece due to several factors, including lack of interpreters in the Greek Asylum Service (GAS). According to official statistics published by the Greek Government, there were 26,275 pending asylum applications at both first and second instance at the end of November 2024 [13].

To indicate average waiting times for decisions on asylum claims, in its communication to the CM, the Greek Government relies on statistics that are valid until April 2024 [14]. However, the ongoing suspension of interpretation services in the GAS, since May 2024, has greatly lengthened waiting times for asylum procedures [15]. Prolonged waiting times are among several severe impacts of the lack of interpreters in Greece's asylum and reception system during 2024, as highlighted in a joint open letter signed by 36 NGOs in November 2024 [16] and submitted to the Bureau of the Hellenic Parliament [17]. The Greek Government admitted to the ongoing interruption to interpretation services in response to a parliamentary question submitted on 16th December 2024 [18], but it is yet to formally announce a timeline for when this provision will be reinstated. We additionally highlight that delays in registration on both the islands and mainland are routine, particularly at times of higher arrivals of asylum seekers, which significantly lengthens the asylum procedure (see section 1.b).

During October and November 2024, MIT was in contact with people who reported that their asylum interview and subsequent application appointments were delayed until spring 2025 and who initiated protests against delays arising from the lack of interpreters [19]. These individuals had arrived in the reception facilities of Kavala and Koutsochero up to two and half months prior to the protests, but had not yet received interview dates. Some additionally reported that they had been transferred between multiple facilities on the mainland prior to arriving at their current facility, meaning that in some cases they had been on Greek territory for up to four months. In October, MIT supported a client who had an asylum interview postponed until June 2025, amounting to a predicted seven month waiting time for the applicant from the registration of their asylum claim to their asylum interview. For subsequent applicants MIT is in contact with at date of submission, the average waiting time for interview appointments is between nine and ten months.

13. Hellenic Ministry of Migration and Asylum. 2024. Report A November 2024 Reception, Asylum & Integration procedures. Available <u>here</u>.

<sup>14.</sup> According to information provided in the Government's communication to the CM, the average waiting time for first instance decisions between April 2023 and April 2024 for first instance and appeals was 40 days; the average waiting time for decisions on appeals during the same period was 60 days.

<sup>15.</sup> The previous provider of interpretation services to the GAS, Metadrasi, deployed a number of interpreters in the Asylum Service on a voluntary basis during December 2024, however a long term solution is yet to be implemented. As per information provided to MIT by the GAS on 14th January 2025, there are ongoing negotiations between the Greek Ministry of Migration and Asylum (MoMA) and Metadrasi but the organisation is not currently providing interpreters to the GAS, while a limited number of EUAA translators are currently working on the islands and are occasionally deployed remotely for Asylum Offices on the mainland.

<sup>16.</sup> Mobile Info Team et al. 2024. Open Letter: Put an end to the disruption of interpretation services still undermining asylum seekers' rights in Greece. Available <u>here</u>.

<sup>17.</sup> See Annex 3 for a copy of the communication from Syriza (in Greek).

<sup>18.</sup> Annexes 4 and 5, containing transcripts of the conversation (in English and Greek respectively) following a parliamentary question submitted by the Greek Communist Party on 16th December 2024 regarding issues related to lack of interpretation and delays in the payment of lawyers employed by the Ministry of Migration, were sent by the submitting organisations to the CM in an email correspondence. They are not included in the annexes to this publication due to their length. A video of the parliamentary session when these issues were discussed is available <a href="https://example.com/https://examp

<sup>19.</sup> Mobile Info Team. 2024. Asylum seekers hold peaceful protests calling on government to reinstate interpretation services. Available <u>here</u>.

Similarly, in eight cases recently represented by ELA at first instance and registered by the Greek authorities between 9 August 2024 and 3 October 2024, the applicants are still waiting to receive a date for their asylum interview. For these, the average waiting time since registration is already six months (at the time of this submission), without an interview date [20]. ELA has also been made aware of the emerging practice of so-called 'fictitious' interview dates being set by Asylum Offices, where interview dates are scheduled with the plan that they will be cancelled later. This has been observed in particular for cases of individuals arriving on the islands and set to be transferred between multiple mainland reception facilities.

This is also the case for the Samos CCAC where in July and August 2024, IHR observed at least 19 cases where asylum interviews were postponed at least once, with some being delayed up to three times. The shortage of interpreters also delayed registration processes and resulted in asylum interview postponements in the Samos CCAC.

Likewise, ELA is aware of several cases where interviews have been postponed multiple times by mainland asylum authorities, due to the lack of interpreters. ELA is currently representing 16 of such cases, registered by the Greek authorities between 18 August 2023 and 8 November 2024, that have been pending or will be pending, for an extensive amount of time. Of the cases for which an interview did take place since registration, the average waiting time for this group is eleven months (at the time of this submission). Of these, three have been pending for a year and a half, with no decision. Of the cases for which an interview has been scheduled but have not taken place yet, the average predicted waiting time before the interview is eight months, although it is likely to be prolonged due to the current lack of interpretation and the likelihood of a significant backlog when interpretation services are reinstated.

In one case supported by ELA, registered in the Fylakio Reception and Identification Centre (RIC) on 28 November 2023, the interview has been postponed several times and is currently scheduled for 29 May 2025. In two other recent cases, Syrian asylum seekers were scheduled for an interview in July 2025, in six months. In seven cases represented by ELA, registered between 2 May 2023 and 9 November 2023, for which a decision was finally taken after multiple delays, the average length of procedures was over a year [21].

Concerning the length of appeal procedures before the Appeal Authority, ELA is currently representing 10 appeals that were submitted between 1 March 2024 and 2 August 2024 that remain pending at the time of writing. Therefore, the average time since submission of these appeals is nine months at the time of this submission. Of these, three have not yet been heard by the Appeals Committee and have not been scheduled for examination.

<sup>20.</sup> The electronic asylum seeker card does not indicate the date of the asylum interview. Applicants should receive an official written summons indicating the date of the interview. However, this practice appears to have been stopped or reduced in the second half of the year. In the experience of the submitting organisations, applicants are currently informed verbally of their interview date by camp management officials or Greek Asylum Service staff. They are usually given a handwritten note indicating the date of their interview, see Annex 6. When no interview date has been scheduled, applicants are only informed orally.

<sup>21.</sup> See Annexes 7-1 and 7-2: first page of a first instance decision. In the first case (Annex 7-1), the application for international protection was registered on 2 May 2023, three interviews took place on 25 January 2024, 12 April 2024 and 11 September 2024 respectively, and a decision was taken on 4 October 2024, amounting to 17 months of waiting. In the second case (Annex 7-2), the application for international protection was registered on 3 August 2023, two interviews took place on 26 June 2024 and 18 October 2024 respectively, and a decision was taken on 26 November 2024, amounting to 16 months of waiting.

## b. Delays in registration of asylum applications

In its communication, the Greek Government notes that: "In order to ensure effective access to the asylum procedure, a special electronic platform is available on the website of the Ministry of Immigration and Asylum, which is used to book appointments for the full recording of applications for international protection".

Delays in registration of asylum claims on the mainland have been frequent since June 2024. This is both due to malfunctioning of the online appointment booking system of the Greek Ministry of Migration and Asylum (MoMA) and due to the lack of interpreters in registration facilities, significantly extending asylum procedures for many applicants. When there is a backlog of registrations at the Malakasa facility, the authorities transfer newly arrived asylum seekers from the mainland registration facility of Malakasa, in the Attica region, to Diavata RIC, located close to Thessaloniki in Northern Greece. This creates frustration and distress among asylum seekers due to the drawn out registration process.

Based on our daily work supporting asylum seekers to navigate the procedure in Greece, we note that the online platform to book appointments to register claims for asylum does not consistently function. During the entire month of October 2024, it was not possible to book an appointment for registration at the Malakasa RIC, due to an error message declaring there were "No dates available at this location" [22]. In one case documented in a joint statement by MIT, RLS and ERBB, a young man from Afghanistan attempted multiple times to book an appointment at Malakasa during the month of October, however he was unable to do so and was subsequently forced to sleep in parks in Athens [23]. Whilst appointments at the Diavata RIC facility continued to be available during this time, many applicants cannot travel hundreds of kilometres north to register, due to the cost of transportation and the risks of apprehension by police while travelling without documents. This issue persisted in at least some cases in December 2024, when attempting to book appointments at the Malakasa facility. Appointments for Diavata RIC were also suspended temporarily towards the end of 2024 due to a backlog in registrations, however applicants were not informed of the reason for the unavailability of appointments. These disruptions are reminiscent of 2023 when the online platform was unavailable for a continuous period of three and a half months. As of January 2025, appointments at Diavata are scheduled on average 15-20 days following requests, leaving applicants without legal protections against detention and without the possibility to access support and services.

Similarly, the registration of subsequent applications via the online platform was problematic in the second half of 2024. Since 1 June, ELA has attempted to register (at least) 27 subsequent applications with the asylum authorities using the platform. If and when provided with a registration date on the online platform after multiple attempts, registrations still failed. When the applicants appeared at the competent asylum authorities on the scheduled registration date, they and their legal representatives were verbally informed that their registrations would not take place due to lack of interpretation and were postponed until further notice. This was observed in the Thessaloniki and Ioannina Regional Asylum Offices. Initially, applicants or their legal representatives were given a written notification stamped by an asylum officer, with a new registration appointment [24]. This practice seems to have stopped in the winter of 2024 and applicants are now only informed orally. All 27 cases represented by ELA are currently still unregistered, which amounts to a current waiting period of seven months, without any form of identification or registration and without access to reception conditions.

<sup>22.</sup> See screenshot of the online platform displaying this message in Annex 8.

<sup>23.</sup> Mobile Info Team. 2024. Joint Statement: Greece must fix its dysfunctional registration system which unlawfully detains asylum seekers and denies them access to fundamental rights. Available here.

<sup>24.</sup> See Annex 9 for an example of such a hand-written notification, obtained by ELA.

During the same period, ELA has been representing asylum seekers who have been struggling to register a subsequent application at the Thrace Regional Asylum Office. When trying to register a subsequent application on the platform for the Regional Asylum Office of Thrace, an error message appeared on the screen. In six similar cases, ELA then contacted the Asylum Office of Thrace directly to ask for an alternative solution that would allow the applicants to register their application. ELA was informed that due to a lack of interpreters, no appointments could be made and therefore no subsequent applications could be registered there [25]. In practice, applicants who try to make a subsequent application in Thrace are left without documentation or access to reception conditions. Their only recourse is to try to lodge a subsequent application at the Regional Asylum Office in Thessaloniki, provided that an appointment can be arranged for them there (see above) and that they have the means to travel such a long distance.

These malfunctions and their long-lasting impact on access to asylum procedures and reception conditions are reminiscent of the previous digital system to lodge an asylum claim that was in place in Greece before November 2021, using the online communication platform Skype. The use of online digital platforms can be problematic, especially if it allows for a shift in responsibility when it comes to lodging initial or subsequent asylum claims: in theory, asylum authorities ensure the possibility of doing so, while in practice the many dysfunctions and technical problems preclude applicants from actually registering a claim. When the problem is brought to the attention of the asylum authorities, applicants or their legal representatives are told that they did not try enough. It is likely not mere coincidence that these technical issues occur each time there is a backlog of applications, but perhaps rather an indication that online platforms are used to serve as a bottleneck for applicants, when asylum authorities are unable to cope. To date, applicants for international protection are forced to spend months on end in a state of limbo, without access to rights or services, while they try to access the registration systems of the asylum authorities.

## c. Lack of access to legal assistance for asylum seekers

In its communication to the CM, the Greek Government states that: "All asylum seekers in Greece have the right to free legal assistance at the appeal stage, upon request. The Asylum Service disposes of a sufficient number of legal representatives and the assignment of cases to them is carried out immediately upon submission of a relevant request".

We note that the Bar Associations of Athens and Thessaloniki have declared the abstention of lawyers from providing legal services in the framework of the State-funded legal aid scheme for appeals ("the Registry"). The abstention follows the non-payment by the MoMA of the lawyers of the Registry, who have not been compensated for the legal services they have provided since November 2023, despite the fact that the EU funds intended for free legal aid have been disbursed. The abstention was declared on 11 November 2024 and extended three times until 24 January 2025 [26]. In other words, there has been no second instance state legal aid provided to asylum seekers since early November 2024. The abstention of lawyers from the register has a significant impact on access to legal aid. In fact, since the first announcement at the beginning of November 2024, asylum offices across the country seem to have stopped notifying rejection decisions as an informal practice. ELA observed that positive first instance decisions have been notified as usual, either orally to the applicants or by post or email directly to their lawyers. However, it appears that negative decisions are not officially notified to applicants or their legal representatives. In more than a dozen cases, ELA observed that asylum officers informed the legal representatives that a decision had been taken (without specifying whether it was positive or negative), but that the decision could not be notified. It is likely that the authorities refrain from notifying negative decisions because they are currently unable to provide legal aid.

<sup>25.</sup> See Annexes 10-1 and 10-2 for email received by ELA from Thrace Asylum Office, in Greek and English translation respectively.

<sup>26.</sup> Thessaloniki Bar Association, announcements from 8 November and 6 December 2024, 8 and 17 January 2025. See Annex 11.

## 2. LIVING CONDITIONS OF ASYLUM SEEKERS

In its communication, the Greek Government states that: "During their accommodation, asylum seekers have access to decent living conditions, to free of charge services of primary medical care and psychosocial support, including to public health units. Cleaning and food services are provided daily. [...] External Security and Safety Unit that operates in all of the Regional Services, in cooperation with the Directors, ensure the safe and proper functioning of the structures, by intervening immediately and dealing with any incident or problem that may occur".

In the following paragraphs we provide evidence to the contrary, namely that asylum seekers face a lack of dignified living conditions in facilities on the islands and mainland, which fall far short of Greece's obligations under domestic and EU legislation.

## a. Living conditions in the Samos Closed Controlled Access Centre (CCAC)

In its communication to the CM the Greek Government claims that accommodation needs in CCACs are "met in consideration of the (...) best interest of the child". Regarding the CPT report on Samos CCAC, the Government notes that: "that this visit took place at a time when challenges were extremely demanding" due to the high numbers of new arrivals. Overcrowding in the Samos CCAC, as reported on in our previous submission to the CM, remained critical in the autumn and winter months of 2024. In November, the Samos CCAC reached its peak occupancy for 2024, with 4,559 individuals held in the facility, pushing the population to 124% of its official capacity of 3,650 [27].

People on the move arriving on Samos continued to be subjected to a regime of de facto detention, without clear information regarding the duration or grounds of the detention. Between July and December 2024, people were detained for an average of 21 days between their arrival and the reception of their red card, which would allow them to leave the CCAC [28]. In October 2024, IHR received reports from clients stating that upon their arrival to the Samos CCAC, they were detained in so-called quarantine zones (despite there being no quarantine regime in place) for several days or up to two weeks in degrading conditions before being moved to the containers in main areas of the CCAC. IHR recorded instances of asylum seekers being detained in overcrowded spaces with as many as 30 people detained in poorly equipped containers, requiring people to sleep on the floor without access to basic necessities such as beds, blankets, showers, toilets with doors and sanitation supplies [29].

In the entire CCAC, continuous water shortages continued to make maintaining basic hygiene and health challenging. Access to tap water fluctuated, with water running only twice per day for one to three hours each. The challenge of maintaining basic hygiene was exacerbated further due to the lack of hygiene products, given to asylum seekers only once upon arrival. Contrary to the Greek government's claim that 10 laundries are available to clean residents' clothes and bedding [30], laundry facilities for the entire CCAC population ceased operations in March 2021. In response to the urgent need for laundry services, MSF partially resumed these services only in November 2024 with seven working machines available for patients with skin conditions and infections such as scabies. While this was a necessary step to address the most urgent cases, it does not meet the total hygienic needs of the entire CCAC population. The Greek Government claims that three meals and bottled water are given daily to people in the CCAC [31].

<sup>27.</sup> UNHCR. 2024. Aegean Islands Weekly Snapshot 04 - 10 Nov. Available <u>here</u>. See Annex 1 for images showing dilapidated conditions of accommodation areas in the Samos CCAC.

<sup>28.</sup> Based on data from I Have Right's case management system.

<sup>29.</sup> Border Violence Monitoring Network. 2024. Balkan Regional Report - October 2024. Available here.

<sup>30.</sup> Secretariat of the Committee of Ministers. 2024. Communication from Greece concerning the group of cases of M.S.S. v. Greece. Annex 1. The submitting organisations requested and were granted access to the annexes attached to the Communication from Greece, as provided by the Secretariat.

<sup>31.</sup> Secretariat of the Committee of Ministers. 2024. Communication from Greece concerning the group of cases of M.S.S. v. Greece. Annex 1.

This is incorrect. At most, people are provided with two small meals a day. Multiple reports from asylum seekers indicate that the food provided is inadequate, often inedible, in both quantity and quality. For example, in August 2024 multiple IHR clients reported receiving food only once in the morning for the whole day with the typical daily provision including just a piece of bread, one orange, a small portion of rice, and one juice box. Furthermore, in August and September 2024, five of IHR's clients reported receiving uncooked, frozen food, such as raw meat, raw eggs, and frozen beans.

While people in the CCAC receive bottled water, accounts by IHR's clients suggest that the quantity provided is often insufficient. According to reports from clients in August, people received one or two 1.5-litre bottles of water each day. This amount is significantly below the World Health Organisation's recommended daily water intake of 2.9 litres for male adults and 2.2 for female adults [32], especially considering temperatures reaching up to 35 degrees celsius in the summer months and minimal shade available in the CCAC.

The shortage of medical staff and limited access to basic medical support continued to jeopardise the health and safety of vulnerable individuals in the CCAC. As of December 2024, there was only one part-time doctor from the Public Hospital in the CCAC. Despite an increase in the medical staff employed under the Hippocrates programme to three nurses, one psychologist, one social worker, one radiology technician, and one coordinator, the team remains significantly understaffed for the current capacity of 4,025 people [33].

## b. Living conditions in the mainland CAFTAAS

In its communication to the CM, the Greek Government claims that Controlled Access Facilities for the Temporary Accommodation of Asylum Seekers (CAFTAAS) offer "a stable living environment [...] meeting TCNs' essential material, social and educational needs".

Severe deficiencies in the living conditions of asylum seekers accommodated in mainland refugee camps-officially termed CAFTAAS - persisted after June 2024. Between June 2024 and the date of submission, MIT continued to receive frequent complaints of poor material conditions in mainland camps, including dilapidated accommodation containers, insufficient provision of non-food items, and low quality of catered food. In most camps residents receive non-food items once upon arrival, except in very vulnerable cases, but these are not supplemented for those forced to stay for extended periods in camps due to ongoing delays in the processing of asylum claims. These issues have persisted over time and were extensively documented in a report published by MIT and Refugee Legal Support in July 2024, based on interviews conducted during spring and summer 2024 [34]. The continued lack of maintenance of accommodation containers became particularly critical as the numbers of asylum seekers increased in autumn and winter [35], as the capacity of some facilities was reduced due to some containers not being fit for purpose.

In recent months, the isolation of people residing in refugee camps has been exacerbated by the near total absence of interpretation services in mainland camps between mid-September and mid-December 2024, which creates huge challenges due to the difficulty people face in communicating their basic needs, in

<sup>32.</sup> WHO. 2005. Nutrients in Drinking Water. Available here.

<sup>33.</sup> UNHCR. 2024. Aegean Islands Weekly Snapshot 23 - 29 Dec. Available here.

<sup>34.</sup> Mobile Info Team and Refugee Legal Support. 2024. Voices from the Camps: Living Conditions and Access to Services in Refugee Camps on the Mainland. Available <a href="https://examps.com/html/>html/html/>htm

<sup>35.</sup> Hellenic Ministry of Migration and Asylum. 2024. Report A November 2024 Reception, Asylum & Integration procedures. Available here.

addition to protection concerns as there is a high risk that those who need psychosocial support or want to report a protection issue, will be unable to do so.

In August 2024, due to the then lack of interpreters provided in accommodation facilities, and critical gaps in transportation services for some camps, healthcare was severely limited in mainland facilities. The Hippocrates programme [36] was rolled out across most mainland accommodation facilities from September onwards, however the programme does not include provision of interpreters, leading to significant gaps in protection needs during 2024. Still in January 2025, the camps of Veria and Filippiada did not have a doctor present to serve the needs of the populations there.

The situation is particularly dire in remote accommodation facilities with limited public transport links and long distances to health care services and hospitals. During January 2025, MIT was contacted by several families accommodated in the remote facility of Sintiki, close to the Bulgarian border, where physical conditions are reportedly particularly poor. MIT received information from clients reporting that toilets and showers are located outside of accommodation containers, and are frequently in broken or substandard condition. These families also reported very limited access to non-food items in the camp. In November 2024, MIT received reports of insect infestations at Sintiki, impacting residents' health, and infestations of rats at the Malakasa RIC facility.

In December, MIT received reports of lack of heating in accommodation containers at Lagadikia reception facility, and reports that the camp administration failed to address complaints about conditions by residents. MIT spoke with a woman in Koutsochero camp, which is located 16 km from the nearest urban centre, in November 2024 who stated: "We haven't been out of the camp because of the long distances to the nearest city. My two children are begging me to leave the camp."

## c. De facto detention and living conditions in Malakasa Reception and Identification Centre (RIC)

In its communication to the CM, the Greek Government fails to provide information on the situation of asylum seekers undergoing the reception and identification procedure while under de facto detention in the mainland RIC facilities of Malakasa and Diavata. Regarding the living conditions in the RICs, the Government's communication states that: "Being fully aligned with its obligations arising from EU and international law, Greece provides the necessary material reception conditions for all TCNs or stateless persons entering the country without legal formalities and submitting an application for international protection".

In October 2024, MIT and other civil society organisations documented a case where a group of asylum seekers were de facto detained at Malakasa RIC beyond the legal maximum of 25 days, without their asylum claims being registered [37]. Concerningly, this group reported that they were not provided with translation for documents issued by the RIC authorities restricting their liberty, which were reportedly only provided in Greek. Individual members of the group reported that they felt compelled to sign these documents without the assistance of an interpreter, as they were informed by the RIC authorities that their asylum claims would not be registered if they did not do so [38].

<sup>36.</sup> Hippocrates is an EU-funded programme managed by IOM which provides medical and psychosocial support services in facilities managed by the Reception and Identification Service (RIS), under the MoMA. An agreement or the programme was announced by the MoMA in May 2024 and the official start date of the programme was July 2024. However medical teams were not present in the accommodation facilities until September 2024.

<sup>37.</sup> Mobile Info Team, Refugee Legal Support and Equal Rights Beyond Borders. 2024. Joint Statement: Greece must fix its dysfunctional registration system which unlawfully detains asylum seekers and denies them access to fundamental rights. Available here.

<sup>38.</sup> Mobile Info Team, Refugee Legal Support and Equal Rights Beyond Borders. 2024. Joint Statement: Greece must fix its dysfunctional registration system which unlawfully detains asylum seekers and denies them access to fundamental rights. Available here.

Moreover, in November 2024, over 100 unaccompanied minors were *de facto* detained in Malakasa RIC, many of whom had not been assigned a guardian, and as a result were unable to move forward with their legal processes [39].

In addition to these legal and procedural issues, the living conditions at mainland RICs, particularly Malakasa, remain substandard [40]. Based on the information provided by the Greek Government in Annex 1 of its communication to the CM, the "New Arrivals" area in Malakasa RIC is designed to provide amenities including bedding, hygiene items, clothing, and footwear to ensure comfort and safety for individuals arriving. However, in October 2024 MIT received reports from asylum seekers residing at Malakasa RIC, including families, who upon arrival were left without basic necessities such as blankets or pillows. One family reported that they were placed in a dilapidated accommodation container, infested with rodents and insects, including bed bugs in the mattresses they were provided with. They further reported severe obstacles in accessing urgent healthcare. In the absence of state-provided transportation to and from the hospital at this time, a member of this family who had fainted had to wait for five hours until an ambulance arrived at the facility to take him to hospital, and the family was forced to pay for private transportation from the hospital back to the camp. Prior to this incident, medical staff reportedly refused to send the man to the hospital despite his dangerously high blood pressure.

The de facto detention of asylum seekers in substandard conditions and for extended periods of time contributes to an environment where tensions between residents arise. An incident at Malakasa RIC in December 2024, in which a 16 year old camp resident reported to the authorities being subjected to torture and sexual assault, highlights the severe risks and unsafe conditions, particularly for vulnerable groups like minors [41].

## d. ESTIA 21 programme

In its communication, the Greek Government notes that the ESTIA 21 programme which previously accommodated vulnerable asylum seekers in apartments in urban areas has been terminated.

The submitting organisations welcome the Greek Government's correction to its previous communication to the CM, which included the inaccurate claim that the ESTIA 21 programme was ongoing in 2023.

## e. Provision of financial aid to asylum seekers

In Annex 2 of the communication from the Greek Government to the CM, it is stated that: "It should be emphasised that material reception conditions beyond housing may be provided in kind or in the form of financial assistance and ensure applicants an adequate standard of living, which guarantees their maintenance and promotes their physical and mental health and the development of their personality, guided by respect for human dignity" [42].

<sup>39.</sup> Mobile Info Team, Refugee Legal Support and Equal Rights Beyond Borders. 2024. Joint Statement: Greece must x its dysfunctional registration system which unlawfully detains asylum seekers and denies them access to fundamental rights. Available <a href="here">here</a>.

<sup>40.</sup> Efsyn. 2024. Unsuitable living conditions in the Malakasa structure. Available here.

<sup>41.</sup> Tovima. 2024. Four Arrested at Attica Refugee Camp for Alleged Rape, Torture of Minor. Available here.

<sup>42.</sup> Secretariat of the Committee of Ministers. 2024. Communication from Greece concerning the group of cases of M.S.S. v. Greece. Annex 2.

The submitting organisations note that, beyond this vague reference, no specific details are provided by the Government regarding the provision of financial aid to asylum seekers in Greece. Despite financial aid constituting a fundamental aspect of material reception conditions as defined in EU and Greek law, applicants have not received cash payments since October 2024, when payments for the months of May and June 2024 were received. Applicants are therefore still missing payments for the months of July-December 2024, with a devastating impact on their ability to access basic dignified living conditions. To date, the MoMA has not published data regarding financial assistance payments to asylum seekers after July 2024 [43].

#### 3. CONDITIONS OF DETENTION

#### a. Limited access to healthcare

In its communication, the Greek Government states the following with regard to provision of healthcare services to third country nationals (TCNs) detained in Pre-Removal Detention Centres (PRDCs): "Cases of TCNs who cannot be treated by the medical staff of the Detention Centre are referred for hospitalisation or examination to a hospital on duty or another appropriate medical institution".

Contrary to the claims of the Greek Government in its communication to the CM, data from nine interviews published by MIT and partners indicates that individuals detained in pre-removal facilities during or after November 2023, reported a lack of adequate access to healthcare across all pre-removal facilities where respondents had been detained [44]. This includes Paranesti, Amygdaleza, Corinth and Xanthi Pre-Removal Detention Centres (PRDC). In most interviews, respondents reported long waiting times to see medical staff and a lack of appropriate follow-up treatment, including lack of access to required medication or an apparent unwillingness of the authorities to transfer detainees to hospital for necessary treatment. According to an individual who was detained at Paranesti PRDC between March and May 2024, there was no doctor present at the facility during this time, and only basic medication, like paracetamol, was provided by staff working there. According to the respondent, one detainee suffered from severe toothache for two months but was denied access to a dentist. These trends are corroborated by previous reporting on conditions in PRDCs in Greece [45]. The Greek Government's plans to increase the capacity of its detention estate by 400 places [46] and explore possibilities for increasing the number of third country nationals who are forcibly returned from Greece [47], raise concerns that detention measures will be increasingly applied in the following years, with substandard living conditions in centres impacting an even greater number of people.

<sup>43.</sup> Hellenic Ministry of Migration and Asylum. 2024. Statistics. Available here.

<sup>44.</sup> Mobile Info Team, Border Violence Monitoring Network and Border Criminologies. 2024. Joint submission to the Council of Europe Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment CPT): Report on the Conditions in Pre-Removal Detention Centres in Greece. Available here.

<sup>45.</sup> See the Detention Landscapes project, a collaborative project which collates testimony data, reports and visual evidence of the conditions in detention in Greece. Available <a href="here">here</a>. 21% of 77 individuals interviewed for the Detention Landscapes project between 2020-2024 regarding their detention in a PRDC, reported that they had no access at all to medical aid during their detention. Further, 60% reported that they had some access to medical aid in detention, but limited and insufficient to meet their needs.

<sup>46.</sup> Ministry of Citizen Protection. 2024. Structures and Functionality of Pre-Removal Detention Centres – Sub-project: Operation Prokeka. Available <a href="https://example.com/html/protection/learning/learning/learning/html/protection/learning/html/protection/learning/html/protection/

<sup>47.</sup> Limenikanea. 2025. Closed borders, open fronts. Available here.

## b. Limited access to legal assistance and information

The Government shared plans with the CM regarding the introduction of a new free legal assistance programme under the Asylum, Migration and Integration Fund (AMIF) "with the purpose of being able to systematically provide free legal assistance to TCNs subject to return procedures (legal advice and interpretation assistance in order to challenge their deportation order)".

In response to the Government's plan, it is important to reiterate that there have been ongoing issues with timely and effective implementation of AMIF projects. There is currently no concrete timeline for when this particular programme will be rolled out, which raises concerns over its impact and accessibility. Additionally, there are concerns about the effectiveness of the monitoring committee established to oversee implementation of AMIF and other EU funded projects in Greece [48], given the limited civil society participation in the committee [49].

In the meantime, persons held in PRDCs consistently report a severe lack of access to clear and accessible information regarding their legal status and rights [50]. Many are unable to understand their situation due to the absence of adequate legal assistance, leaving them in a vulnerable position without the means to challenge their detention or deportation orders.

## 4. The use of police stations for extended periods of detention

Greek Government states that: "In order to ensure the proper implementation of Directive 2008/115/EC "On Returns", clear instructions have been given and efforts are constantly ongoing to ensure that TCNs subject to return procedures are not detained in police detention premises, but are taken as soon as possible to the Pre-Removal Detention Centres, after their identification and the issuing of the necessary decisions".

The submitting organisations note that the Greek Government does not provide specific information relating to the numbers of third country nationals detained in police stations in Greece, the average length of detention in police detention, and the conditions therein.

Data from civil society organisations and official monitoring bodies indicates that there were considerable numbers of third country nationals in police detention towards the end of 2023 [51]. However, data on the average length of detention in police facilities for third country nationals is lacking. Out of 92 interviews conducted by MIT and partners with people who underwent administrative detention in Greece between 2020-2024, 35 respondents reported that they were detained in a police station prior to their transfer to a PRDC [52]. In many of these cases, individuals were detained beyond one month in a police facility, prior to transfer to a PRDC.

<sup>48.</sup> Ministerial decision establishing the monitoring committee is available here.

<sup>49.</sup> Solomon. 2024. The legislative "game" of the Ministry of Migration with the European funds. Available here.

<sup>50.</sup> Mobile Info Team, Border Violence Monitoring Network and Border Criminologies. 2024. Joint submission to the Council of Europe Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT): Report on the Conditions in Pre-Removal Detention Centres in Greece. Available <a href="https://example.com/html/per-punishment">here</a>. P.14-16

<sup>1.</sup> According to data collected by Refugee Support Aegean, available <u>here</u>, there were 261 people detained under administrative procedures in Greek police stations at the end of 2023. Data of the Greek Ombudsperson, available <u>here</u>, indicates that at the beginning of November 2023 there were 354 people detained in police stations.

<sup>52.</sup> Testimonies were collected by the Border Violence Monitoring Network in the context of the Detention Landscapes project and are publicly available <a href="here">here</a>.

This is particularly concerning given the reported poor conditions in police departments which are designed for short term detention only, for instance the Metagogon Transfers facility in Thessaloniki where, according to our testimony data, third country nationals and asylum seekers have been detained for periods up to three and a half months in extremely poor conditions [53].

## 5. Length of administrative detention in Pre-Removal Detention Centres (PRDCs)

In its communication, the Greek Government states that: "It is recalled that according to national legislation detention is imposed for the time strictly necessary for the completion of the removal procedure with a maximum period of six (6) months, which may be extended for a further twelve (12) months. In 2024, about 30% of deportation/return decisions for detainees in Pre-Removal Centres were extended beyond 6 months".

We note that Greek law deviates from the EU Returns Directive in favouring detention over alternative measures, despite the low prospect of removal for many third country nationals in detention in Greece [54].

In November 2023, the Greek Ombudsperson visited the PRDCs of Amygdaleza and Corinth and reported that out of 724 detainees in Amygdaleza, 103 had been detained for more than six months, 34 had been detained for more than 12 months, and two people for more than 17 months.55 For Corinth PRDC, the Ombudsperson reported that out of 637 detainees, 157 had been detained for more than six months and 58 for more than 12 months and 10 people for more than 18 months.

MIT is regularly in contact with people detained in PRDCs who report that they are experiencing severe psychological distress due to their extended detention which is experienced as arbitrary and disproportionate, exacerbated by lack of information on the reasons for the extension of detention and the harsh physical conditions in PRDCs.

<sup>53.</sup> Detention Landscapes. 2024. Testimony collected by the Border Violence Monitoring Network. Available here.

<sup>54.</sup> Greek Ombudsman. 2023. Special Report | Immigrant Returns 2023. Available here.

# **CONCLUSION & RECOMMENDATIONS**

*M.S.S. v. Belgium and Greece* has been pending implementation for over 13 years. Yet, as highlighted by the submitting organisations, serious problems continue to persist, affecting a large number of asylum seekers and third country nationals in Greece. The submitting organisations recommend:

## The Committee should examine the cases on an annual basis.

## a. Regarding access to asylum:

- The Committee should request Greece to detail the specific measures it has introduced or aims to introduce in order to resolve the chronic delays in the asylum application process and grant efficient access to the asylum procedure on the mainland and the islands within the deadlines set out in EU and domestic law.
- The Committee should request Greece increase staffing of the Greek Asylum Service and cease employing staff on short-term contracts.
- The Committee should request Greece to detail the specific measures it has introduced or aims to introduce to ensure sufficient interpretation services during asylum procedures, including a clear timeline regarding the restoration of interpretation services, which remain compromised at the time of writing.

## b. Regarding the lack of access to legal aid and representation during asylum procedures:

- The Committee should urge Greece to ensure unhindered and sufficient access to legal information and assistance for asylum seekers hosted in Greek reception facilities, in accordance with EU law.
- The Committee should request Greece to detail the specific measures it has introduced or aims to introduce in order for asylum seekers to access legal aid and representation and the effectiveness of remedies after a first or second instance rejection decision.

## c. Regarding the living conditions of asylum seekers in Greece:

- The Committee should request Greece to repeal Article 40(a) of the Asylum Code and end the regime of *de facto* detention in CCACs and RICs.
- The Committee should request Greece to provide a detailed account of the measures it has introduced or aims to introduce to ensure consistent and timely access to financial aid for asylum seekers in Greece.
- The Committee should request Greece to provide a detailed account of the measures it has introduced or aims to introduce to address the issue of substandard conditions in state facilities hosting asylum seekers in Greece as well as to alleviate the extreme and widespread isolation of residents.
- The Committee should urge Greece to ensure sufficient access to food, water and hygiene items to asylum seekers residing in state facilities.
- The Committee should urge Greece to ensure sufficient access to adequate medical and psychosocial care to asylum seekers in state facilities.
- The Committee should urge Greece to restore alternatives to camp accommodation, inter alia by exploring how to mobilise community resources.
- The Committee should urge Greece to take immediate action to respond to the homelessness crisis of asylum seekers and refugees in Greece.

<sup>55.</sup> Greek Ombudsman. 2023. Special Report | Immigrant Returns 2023. Available here.



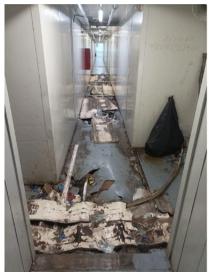
## d. Regarding the conditions in detention in Greece:

- The Committee should urge Greece to ensure a proportionate and justified use of detention, under appropriate legal basis.
- The Committee should urge Greece to ensure that the deprivation of liberty of asylum seekers and migrants is used as a measure of last resort, in accordance with EU and domestic law.
- The Committee should request Greece to report on the measures taken, or the measures that will be taken, to urgently improve access to health care, interpretation services and the unsanitary conditions in PRDCs.
- The Committee should request Greece to report on the measures taken, or the measures that will be taken, to ensure that third country nationals are not detained for prolonged periods of time in police stations.
- The Committee should request Greece to provide detailed and up to date information on the number of third country nationals detained in police stations, the average length of detention, and the measures in place to ensure that conditions are adequate and humane and detainees have access to healthcare and legal support.

# **ANNEXES**

Annex 1. Images showing physical conditions in the Samos Closed Control Access Centre (CCAC), shared by a client of I Have Rights. November 2024.

Left: corridor in the accommodation area. Middle: toilet facilities. Right: accommodation container in so-called quarantine zone.







Annex 2. Images showing interior of an accommodation container in Malakasa Reception and Identification Centre (RIC), shared by a client of Mobile Info Team. October 2024.

Left: hole in floor of accommodation container provided to an asylum seeking family at Malakasa RIC.

Right: insect infested mattress provided to an asylum seeking family at Malakasa RIC.





# Annex 3. SYRIZA report to the Bureau of the Hellenic Parliament 151124 GR, including open letter on interpretation services signed by 36 NGOs.

ΒΟΥΛΗ ΤΩΝ ΕΛΛΗΝΩΝ ΔΙΕΥΘΥΝΣΗ ΚΟΙΝΟΒΟΥΛΕΥΤΙΚΟΥ ΕΛΕΓΧΟΥ

Αριθμ. Πρωτ. ΑΝΑΦΟΡΩΝ: 382

Ημερομ. Κατάθεσης: 15/11/2024



# Προς το Προεδρείο της Βουλής των Ελλήνων ΑΝΑΦΟΡΑ Για τον κ. Υπουργό Μετανάστευσης και Ασύλου

Θέμα: «Άμεση αποκατάσταση των υπηρεσιών διερμηνείας και διασφάλιση όλων των δικαιωμάτων για τους αιτούντες άσυλο».

Ο βουλευτής Κορινθίας της Κοινοβουλευτικής Ομάδας του ΣΥΡΙΖΑ – Προοδευτική Συμμαχία, Γιώργος Ψυχογιός, θεωρώντας ύψιστης σημασίας το ζήτημα, καταθέτει ως αναφορά την ανοικτή επιστολή1 που υπογράφουν τριάντα έξι Οργανώσεις και φορείς και απευθύνουν προς το ελληνικό Υπουργείο Μετανάστευσης και Ασύλου, επισημαίνοντας τη συνεχιζόμενη έλλειψη υπηρεσιών διερμηνείας για τους αιτούντες άσυλο στην Ελλάδα, οι οποίες έχουν διαταραχθεί σοβαρά από τον Μάιο του 2024.

Επισημαίνεται ότι ο προηγούμενος πάροχος (Μετάδραση) ανέστειλε την παροχή υπηρεσιών λόγω επανειλημμένων καθυστερήσεων πληρωμών από το Υπουργείο. Παρά την ευαισθητοποίηση του κοινού για το θέμα, δεν έχουν εφαρμοστεί μέτρα για την αποκατάσταση ενός λειτουργικού συστήματος ερμηνείας.

Μέσα από την επιστολή οι Οργανώσεις επισημαίνουν την ανάγκη άμεσης αποκατάστασης των υπηρεσιών διερμηνείας, είτε μέσω ανανέωσης των συμβάσεων με τον προηγούμενο πάροχο είτε με άλλον. Επίσης, η ανάγκη για άμεση δημοσίευση δήλωσης που να εξηγεί πότε θα επαναληφθούν οι διαδικασίες και ποιοι είναι οι λόγοι και ο αντίκτυπος της διακοπής. Επιπρόσθετα προτείνεται η επαναφορά όλων των διαδικασιών ασύλου το συντομότερο δυνατόν, ιδίως της υποβολής μεταγενέστερων αιτήσεων και των πρωτοβάθμιων προσφυγών. Αναφέρεται, επιπλέον, η έκδοση προσωρινών εγγράφων σε άτομα που έχουν λάβει πρώτη απόρριψη, ώστε να μπορούν να ασκήσουν πλήρως τα δικαιώματά τους στην Ελλάδα. Τονίζεται η ανάγκη για άμεση δράση για τη μείωση των συσσωρευμένων εκκρεμοτήτων και η διασφάλιση της μείωσης των καθυστερήσεων στην έκδοση και ανανέωση εγγράφων. Τέλος, προτείνεται ο συντονισμός με το Υπουργείο Υγείας για την παροχή υποστήριξης διερμηνείας σε χώρους υγειονομικής περίθαλψης.

Επισυνάπτεται η ανοικτή επιστολή των 36 Οργανώσεων. Παρακαλούμε για τις ενέργειές σας και να μας ενημερώσετε σχετικά.

Αθήνα, 7 Νοεμβρίου 2024

Ο καταθέτων Βουλευτής Ψυχογιός Γεώργιος Ανοιχτή επιστολή: Να μπει ένα τέλος στα κενά σε υπηρεσίες διερμηνείας που εξακολουθούν να υπονομεύουν τα δικαιώματα των αιτούντων άσυλο στην Ελλάδα

## Προς

Τον Υπουργό Μετανάστευσης και Ασύλου, κ. Νικόλα Παναγιωτόπουλο Την Υφυπουργό Μετανάστευσης και Ασύλου, κ. Σοφία Βούλτεψη Τον Υπουργό Υγείας, κ. Άδωνη Γεωργιάδη Την Αναπληρώτρια Υπουργό Υγείας, κ. Ειρήνη Αγαπιδάκη

## Κοινοποίηση

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Προϊσταμένη Μονάδας στη Γενική Διεύθυνση Μετανάστευσης και Εσωτερικών Υποθέσεων της Ευρωπαϊκής Επιτροπής, κ. Katerina Wolfova

Εκπρόσωπος της Ύπατης Αρμοστείας του ΟΗΕ για τους Πρόσφυγες στην Ελλάδα, κ. Maria Clara Martin

Συνήγορος του Πολίτη, κ. Ανδρέας Ποττάκης

Πρόεδρος της Εθνικής Επιτροπής Ανθρωπίνων Δικαιωμάτων, κ. Μαρία Γαβουνέλη

Αξιότιμοι/ες Κύριοι/ες Υπουργοί,

Με την παρούσα ανοιχτή επιστολή, οι υπογράφοντες φορείς θέλουμε να εκφράσουμε τη βαθιά μας ανησυχία για τις επίμονες έλλειψεις στις υπηρεσίες διερμηνείας για πρόσφυγες και αιτούντες άσυλο στην Ελλάδα, οι οποίοι πλέον αντιμετωπίζουν ακόμη μεγαλύτερους περιορισμούς σε βασικά τους δικαιώματα όπως είναι η αποτελεσματική πρόσβαση στη διαδικασία ασύλου και το δικαίωμα πρόσβασης στην υγειονομική περίθαλψη. Ενώ μέσα ενημέρωσης και φορείς της κοινωνίας των πολιτών κατά διαστήματα τους τελευταίους μήνες έχουν τονίσει τις σοβαρές ελλείψεις σε διερμηνείς και άλλα κενά που έχουν σημειωθεί στην παροχή υπηρεσιών διερμηνείας, δεν υπάρχουν ενδείξεις ότι έχουν ληφθεί προσήκοντα μέτρα για την εδραίωση ενός λειτουργικού συστήματος διερμηνείας στις διαδικασίες ασύλου στην Ελλάδα.

Θα θέλαμε να υπενθυμίσουμε στους αποδέκτες αυτής της επιστολής ότι η οργάνωση ΜΕΤΑδραση, που μέχρι πρότινος παρείχε υπηρεσίες διερμηνείας στις αρμόδιες αρχές ασύλου, ανέστειλε τις δραστηριότητές της στις 14 Μαΐου 2024 λόγω πολύμηνων καθυστερήσεων στις πληρωμές από το Υπουργείο Μετανάστευσης και Ασύλου. Δημόσια έγγραφα δείχνουν ότι πληρωμές στη ΜΕΤΑδραση για εργασίες που ολοκληρώθηκαν τον Δεκέμβριο του 2023 καταβλήθηκαν από το Υπουργείο τον Ιούλιο του τρέχοντος έτους, ύστερα δηλαδή από καθυστέρηση επτά μηνών. Το Υπουργείο δεν έχει εκδώσει ακόμη κάποια ανακοίνωση σχετικά με την επαναφορά των υπηρεσιών διερμηνείας, οι οποίες χρηματοδοτούνται από το Ταμείο Ασύλου, Μετανάστευσης και

Ένταξης (ΤΑΜΕ) για την περίοδο 2021-2027, είτε από τη ΜΕΤΑδραση είτε από κάποιον άλλον πάροχο.

Λόγω των συνεχιζόμενων καθυστερήσεων στην ανανέωση της σύμβασης παροχής διερμηνείας, προς το παρόν δεν υπάρχουν σχεδόν καθόλου διαθέσιμοι διερμηνείς εντός της Υπηρεσίας Ασύλου και εξαιρετικά περιορισμένος είναι επίσης ο αριθμός διερμηνέων σε προσφυγικές δομές τόσο στην ενδοχώρα όσο και στα νησιά. Αντιλαμβανόμαστε ότι εξίσου ασαφής είναι η τύχη προσωρινών ρυθμίσεων που τέθηκαν σε εφαρμογή με σκοπό να καλύψουν επείγοντα κενά, όπως η υποστήριξη στη διερμηνεία που παρέχεται από τον Οργανισμό της Ευρωπαϊκής Ένωσης για το Άσυλο (ΕUAA) σε σημεία καταγραφής σε ολόκληρη τη χώρα. Στα τέλη Σεπτεμβρίου 2024, η παροχή υπηρεσιών διερμηνείας από την ΕUAA μειώθηκε σημαντικά, επηρεάζοντας κυρίως τις προσφυγικές δομές στην ενδοχώρα.

Ακόμη, στα πλαίσια του προγράμματος Hippocrates, η υλοποίηση του οποίου ξεκίνησε πρόσφατα, δεν προβλέπονται κονδύλια για υπηρεσίες διερμηνείας κάτι που προκαλεί σημαντικά εμπόδια στην παροχή υγειονομικής περίθαλψης σε αιτούντες άσυλο που ζουν σε προσφυγικές δομές. Η έλλειψη διερμηνείας επιβαρύνει περαιτέρω νοσοκομεία και ιατρικές εγκαταστάσεις, που ήδη αντιμετωπίζουν κενά, και αυξάνουν τον κίνδυνο επιδείνωσης της υγείας μεταναστών και αιτούντων άσυλο που δυσκολεύονται να έχουν έγκαιρη πρόσβαση σε βασικές υπηρεσίες.

Οι κάτωθι συνυπογράφοντες οργανισμοί, είμαστε ενήμεροι πολλών περιπτώσεων όπου ως αποτέλεσμα της κατάστασης οι αιτούντες άσυλο αδυνατούν να προχωρήσουν με τα αιτήματά τους για διεθνή προστασία ή να επικοινωνήσουν αποτελεσματικά με τις αρχές, με σοβαρές συνέπειες σε όλες τις πτυχές της ζωής τους.

# Περιορισμοί στην πρόσβαση στο άσυλο οδηγούν ανθρώπους σε αδιέξοδο και χωρίς προστασία

Λόγω της έλλειψης διερμηνείας, οι αιτούντες διεθνούς προστασίας εξακολουθούν να έρχονται συχνά αντιμέτωποι με αναβολές στις συνεντεύξεις ασύλου τους επειδή η Ελληνική Υπηρεσία Ασύλου δεν διαθέτει διερμηνείς που να μιλούν μια γλώσσα που μπορούν να κατανοήσουν. Λίγες συνεντεύξεις πραγματοποιούνται εξ' αποστάσεως, με αποτέλεσμα να υπάρχει κίνδυνος κακής επικοινωνίας και άλλων δυσκολιών. Η απουσία βοήθειας διερμηνέα έχει αντίκτυπο σε όλα τα στάδια της διαδικασίας ασύλου, καθώς σε πολλές περιπτώσεις δεν είναι δυνατό να πραγματοποιηθούν οι συνεντεύξεις, δεν μπορούν να κοινοποιηθούν οι αποφάσεις στους αιτούντες και δεν μπορούν να υποβληθούν μεταγενέστερες αιτήσεις ή προσφυγές.

Παρά τις σοβαρές ελλείψεις στη διερμηνεία, οι αρχές εξακολουθούν να προτρέπουν τους αιτούντες άσυλο να συνεχίσουν όλες τις ενέργειες που σχετίζονται με τα αιτήματα διεθνούς προστασίας τους. Ως αποτέλεσμα, αναμένεται από τους αιτούντες να ταξιδέψουν, συχνά με δικά τους έξοδα, για να συναντήσουν τις αρχές ασύλου σε αστικά κέντρα, μόνο και μόνο για να μάθουν ότι το ραντεβού τους έχει αναβληθεί. Δεδομένου

ότι οι αιτούντες άσυλο δεν μπορούν να προχωρήσουν με τις αιτήσεις ή τις προσφυγές τους, αναγκάζονται να ζουν στην Ελλάδα χωρίς πρόσβαση σε βασικά δικαιώματα όπως η υγειονομική περίθαλψη, και χωρίς τη δυνατότητα να εργαστούν ή να λάβουν οικονομικά βοηθήματα.

## Αδυναμία πρόσβασης σε υγειονομική περίθαλψη και περαιτέρω απομόνωση

Τα γλωσσικά εμπόδια λόγω των ελλείψεων στη διερμηνεία μπορούν να αποβούν ιδιαίτερα σοβαρά για άτομα με ευπάθειες και επείγουσες ή περίπλοκες ιατρικές ανάγκες, συμπεριλαμβανομένων εκείνων που πάσχουν από χρόνιες ασθένειες ή ψυχικές διαταραχές, καθώς και για τις επιζώσες έμφυλης βίας. Όταν η βοήθεια διερμηνέα είναι περιορισμένη ή ανύπαρκτη, οι αξιολογήσεις ευαλώτητας δεν μπορούν να διεξαχθούν σωστά. Πέρα από μια διαδικαστική παράλειψη, η έλλειψη ερμηνείας μπορεί περαιτέρω να αποτελεί άμεση παραβίαση του θεμελιώδους δικαιώματος στην υγειονομική περίθαλψη, καθώς συχνά οι αιτούντες άσυλο δεν μπορούν να επικοινωνήσουν τα συμπτώματά τους, να λάβουν ακριβείς διαγνώσεις ή να κατανοήσουν τις οδηγίες για τη θεραπεία τους.

Η κατάσταση αποτελεί πρόσθετο πλήγμα στις ήδη υποβαθμισμένες συνθήκες διαβίωσης των αιτούντων άσυλο στην Ελλάδα, που πρόσφατα επηρεάστηκαν περαιτέρω από τις πολύμηνες καθυστερήσεις στις πληρωμές οικονομικών βοηθημάτων. Έχει επίσης ως αποτέλεσμα την περαιτέρω απομόνωση όσων διαμένουν σε προσφυγικές δομές, επιδεινώνοντας τη γενική έλλειψη υποστήριξης και τις εξαιρετικά κακές συνθήκες που εντοπίζονται σε απομακρυσμένες δομές στην ενδοχώρα αλλά και στις δομές των νησιών του Αιγαίου. Μέχρι σήμερα, παραμένει ασαφές πότε και πώς θα επιλυθούν αυτά τα ζητήματα, αφήνοντας τους αιτούντες άσυλο στο σκοτάδι.

Για τους παραπάνω λόγους, καλούμε τους παραλήπτες αυτής της επιστολής να αναγνωρίσουν τη σοβαρότητα της κατάστασης και να λάβουν όλα τα απαραίτητα μέτρα για να διασφαλίσουν ότι οι ανάγκες των αιτούντων άσυλο για πρόσβαση σε διερμηνεία γίνονται σεβαστες μέσω:

- Της άμεσης επαναφοράς των υπηρεσιών διερμηνείας είτε με ανανέωση της σύμβασης με τον προηγούμενο πάροχο υπηρεσιών διερμηνείας είτε με τη σύναψη σύμβασης με άλλο πάροχο,
- Της άμεσης δημοσίευσης επίσημης ανακοίνωσης που να εξηγεί πότε θα ξαναρχίσουν οι διαδικασίες που έχουν επηρεαστεί από τις παρούσες ελλείψεις καθώς και τους λόγους και τις επιπτώσεις αυτών των ελλείψεων,
- Της όσο πιο σύντομης επαναφοράς όλων των διαδικασιών ασύλου που έχουν επηρεαστεί από την κατάσταση, και ιδιαίτερα της υποβολής μεταγενέστερων αιτήσεων και προσφυγών σε πρώτο βαθμό,
- Της έκδοσης προσωρινών εγγράφων σε άτομα των οποίων τα αιτήματα για διεθνή προστασία έχουν απορριφθεί σε πρώτο βαθμό, ώστε να μπορούν να ασκήσουν πλήρως τα δικαιώματά τους στην Ελλάδα, συμπεριλαμβανομένου του δικαιώματος εργασίας, και του δικαιώματος πρόσβασης σε υγειονομική περίθαλψη, υπηρεσίες υποδοχής και οικονομικά βοηθήματα.

- Της άμεσης λήψης μέτρων με σκοπό τη μείωση των υποθέσεων που βρίσκονται σε εκκρεμότητα (backlog), οι οποίες έχουν επηρεαστεί περαιτέρω από τη διακοπή των υπηρεσιών διερμηνείας, και του περιορισμού όποιων καθυστερήσεων στην έκδοση και ανανέωση εγγράφων,
- Της εξασφάλισης ότι όσοι αιτούντες άσυλο επηρεάζονται από μελλοντικές ελλείψεις και κενά στη διαδικασία ασύλου α) είναι επαρκώς ενήμεροι σχετικά με τον αντίκτυπο αυτών των ελλείψεων στην πρόσβαση τους στη διαδικασία ασύλου και σε άλλα θεμελιώδη τους δικαιώματα, και β) έχουν πρόσβαση σε προσωρινά έγγραφα που τους προστατεύουν από αστυνομικούς ελέγχους και αυθαίρετη κράτηση,
- Του συντονισμού με το Υπουργείο Υγείας με σκοπό την άμεση παροχή διερμηνείας σε χώρους υγειονομικής περίθαλψης, ιδιαίτερα όσον αφορά περιπτώσεις που χρήζουν επείγουσα ιατρική φροντίδα.

## Με εκτίμηση,

Action for Women ARSIS Association for the Social Support of Youth Avocats Sans Frontières France Centre for Gender Rights and Equality DIOTIMA Collective Aid Changemakers Lab Γιατροί χωρίς Σύνορα-Ελληνικό τμήμα Dråpen i Havet / Stagona ECHO100PLUS Equal Legal Aid Equal Rights Beyond Borders European Lawvers in Lesvos (ELIL) Fenix Humanitarian Legal Aid Greek Council for Refugees (GCR) Greek Forum of Migrants Greek Forum of Refugees HIAS Greece I Have Rights. Inter Alia INTERSOS HELLAS Irida Center Jesuit Refugee Service (JRS) Greece Legal Centre Lesvos Lesvos Solidarity Lighthouse Relief Mazí Housing
Mobile Info Team
Project Armonia
Refugee Legal Support
Safe Passage International
Samos Volunteers
Second Tree
Symbiosis-Council of Europe School of Political Studies in Greece
Thalassa of Solidarity
Velos Youth
Yoga and Sport with Refugees

Annex 6. Asylum seeker card and corresponding hand-written note with asylum interview date



## Annex 7.1. First page of a first instance decision (Original Greek and English translation)

Προσφυγικό καθεστώς Αρ. Υπόθεσης Ατομικού Φακέλου



ΥΠΟΥΡΓΕΙΟ ΜΕΤΑΝΑΣΤΕΥΣΗΣ ΚΑΙ ΑΣΥΛΟΥ ΓΕΝΙΚΗ ΓΡΑΜΜΑΤΕΙΑ ΜΕΤΑΝΑΣΤΕΥΤΙΚΗΣ ΠΟΛΙΤΙΚΗΣ ΥΠΗΡΕΣΙΑ ΑΣΥΛΟΥ ΔΙΕΥΘΎΝΣΗ ΠΕΡΙΦΕΡΕΙΑΚΩΝ ΥΠΗΡΕΣΙΩΝ Περιφερειακό Γραφείο Ασύλου Θράκης Ταχ.Δ/νση: Λ. Μάκρης 1-Β, Αλεξανδρούπολη Ταχ. κώδικας: 68100

Τηλ.: 2551035170

E-mail: AS.rao.thraki@migration.gov.gr

Αλεξανδρούπολη. 04/10/2024 Αρ.πρω

Θέμα: «Απόφαση α' βαθμού επί αίτησης διεθνούς προστασίας»

Επί της από 02/05/2023 αίτησης για χορήγηση διεθνούς προστασίας του (επώνυμο)											
(όνομα) (πατρώνυμο	ο) μητρώνυμο)	(γέννηση)	(ιθαγένεια)								

## Λαμβάνοντας υπόψη

- α΄) τις διατάξεις του ν.δ. 3989/1959 «Περί κυρώσεως της πολυμερούς Συμβάσεως περί της Νομικής Καταστάσεως των Προσφύγων» (ΦΕΚ 201, τ. Α΄), όπως συμπληρώθηκε με τον α.ν. 389/1967 «Περί κυρώσεως του Πρωτοκόλλου της Νέας Υόρκης της 31.1.1967 εν σχέσει προς την Νομικήν Κατάστασιν των Προσφύγων» (ΦΕΚ 125, τ. Α΄),
- β΄) τις διατάξεις του ν. 4939/2022 για την υποδοχή, τη διεθνή προστασία πολιτών τρίτων χωρών και ανιθαγενών και την προσωρινή προστασία σε περίπτωση μαζικής εισροής εκτοπισθέντων αλλοδαπών (Α' 111/10.06.2022),
- γ') την κοινή υπουργική απόφαση υπ' αριθμ. 78391 (ΦΕΚ τ.Β' 667/15.02.2022) «Κατάρτιση Εθνικού Καταλόγου χωρών καταγωγής που χαρακτηρίζονται ως ασφαλείς, σύμφωνα με την παρ. 5 του άρθρου 92 του v. 4939/2022 (A' 111)»,
- δ΄) τις διατάξεις της Υπουργικής Απόφασης οικ. 3385/2018 «Κανονισμός λειτουργίας Υπηρεσίας Ασύλου» (ΦΕΚ 417, τ. Β΄),
- ε΄) το από 2/5/23 ΥΠΥ01 έγγραφο της ΥπΥΤ (Καταγραφή προσωπικών στοιχείων) του οποίου έλαβε γνώση ο ανωτέρω,
- στ') την από 02/05/2023 αίτηση του ανωτέρω,
- ζ') τις από 25/1/24, 12/4/24 και 11/9/24 καταγραφές προσωπικής συνέντευξης,
- η΄) τα σχετικά έγγραφα που προσκόμισε ο ανωτέρω,
- θ΄) όλα τα στοιχεία του διοικητικού φακέλου του,



MINISTRY OF IMMIGRATION AND ASYLUM GENERAL SECRETARIAT FOR IMMIGRATION POLICY IMMUNITY SERVICE REGIONAL SERVICES DIRECTORATE Regional Asylum Office of Thrace Postal address: 1-B Makris Street, Alexandroupoli Postal code: 68100

Alexandroupoli, 04/10/2024 Ref:

Tel: 2551035170 E-mailAS.rao.thraki@migration.gov.gr

Subject: "First instance decision on an application for international protection"

On the application of 02/05/2023 for international protection of (surname) (first name) (patronymic) (maiden name) (birth) (nationality)

#### **Whereas**

- a) the provisions of Law 3989/1959 "On the ratification of the Multilateral Convention on the Legal Status of Refugees" (Government Gazette 201, Vol. 389/1967 'On the ratification of the New York Protocol of 31.1.1967 relating to the Legal Status of Refugees' (Government Gazette 125, No A),
- b) the provisions of Law no. 4939/2022 on the reception, international protection of third country citizens and stateless persons and temporary protection in case of mass influx of displaced foreigners (A' 111/10.06.2022),
- c') the Joint Ministerial Decision No. 78391 (Government Gazette Vol. 5 of Article 92 of Law No. 4939/2022 (A' 111)",
- d) the provisions of the Ministerial Decision οικ. 3385/2018 "Regulation on the operation of the Asylum Service" (Government Gazette 417, Vol.)
- e) the 2/5/23 YPY01 document of the Ministry of Justice (Recording of personal data) of which the above has taken note,
- f) the request of 02/05/2023 of the above mentioned,
- g) the 25/1/24, 12/4/24 and 11/9/24 recordings of a personal interview; h) the relevant documents submitted by the above-mentioned,
- (i) all the information in its administrative file,

## Annex 7.2. First page of a first instance decision (Original Greek only)

Προσφυγικό καθεστώς Αρ. Υπόθεσης Αρ. Ατομικών Φακέλων

ΥΠΟΥΡΓΕΙΟ ΜΕΤΑΝΑΣΤΕΥΣΗΣ ΚΑΙ ΑΣΥΛΟΥ ΓΕΝΙΚΗ ΓΡΑΜΜΑΤΕΙΑ ΜΕΤΑΝΑΣΤΕΥΤΙΚΗΣ ΠΟΛΙΤΙΚΗΣ ΥΠΗΡΕΣΙΑ ΑΣΥΛΟΥ ΔΙΕΥΘΥΝΣΗ ΠΕΡΙΦΕΡΕΙΑΚΩΝ ΥΠΗΡΕΣΙΩΝ Περιφερειακό Γραφείο Ασύλου Θεσσαλονίκης

Ταχ.Δ/νση: Πόντου 5, Θεσσαλονίκη

Ταχ. κώδικας: 54628 Τηλ.: 2310751775

E-mail: AS.rao.thessaloniki@migration.gov.gr

Θεσσαλονίκη, 26/11/2024 Αρ.πρωτ.:

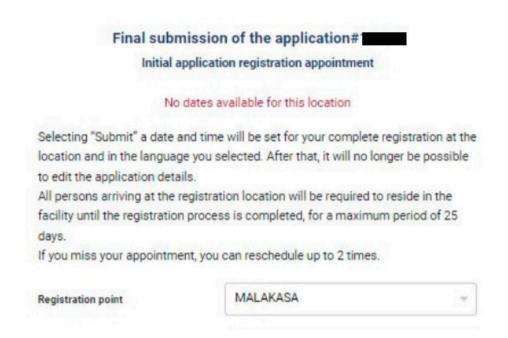
Θέμα: «Απόφαση α' βαθμού επί αίτησης διεθνούς προστασία	επί αίτησης διεθνούς προστασίας»
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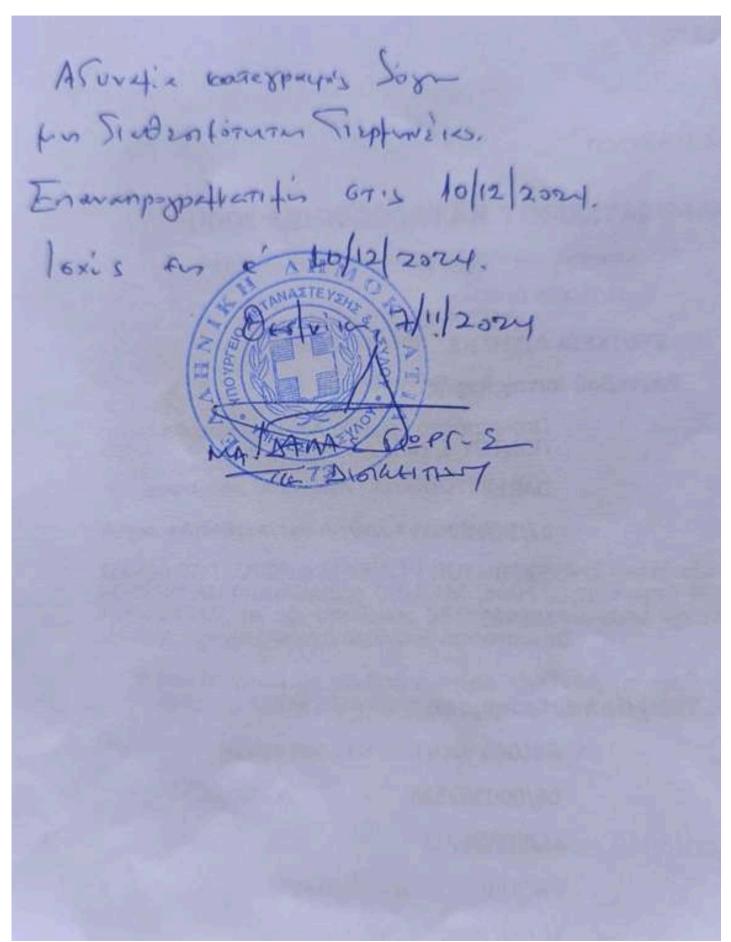
Επί	της	από	03/08/2023	αίτησης	για	χορήγηση	διεθνούς	προστασίας	της	(επώνυμο)
		(á	νομα)		πατρ	οώνυμο)	(μ	ητρώνυμο)		
(γέν	νηση	1)		(ιθαγέ	νεια	2)				
Επί	της	από	03/08/2023	αίτησης	για	χορήγηση	διεθνούς	προστασίας	του	(επώνυμο)
	(όνομα)			(πατρώνυμο)			(μητρώνυμο)			(γέννηση
		(ι	θαγένεια)							

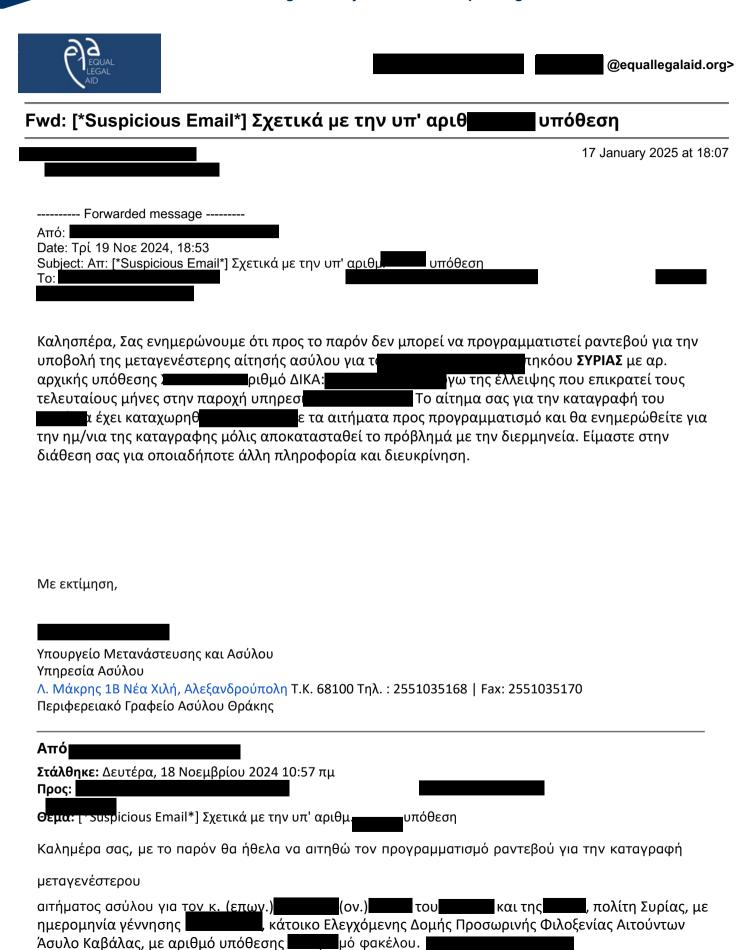
#### Λαμβάνοντας υπόψη

- α΄) τις διατάξεις του ν.δ. 3989/1959 «Περί κυρώσεως της πολυμερούς Συμβάσεως περί της Νομικής Καταστάσεως των Προσφύγων» (ΦΕΚ 201, τ. Α΄), όπως συμπληρώθηκε με τον α.ν. 389/1967 «Περί κυρώσεως του Πρωτοκόλλου της Νέας Υόρκης της 31.1.1967 εν σχέσει προς την Νομικήν Κατάστασιν των Προσφύγων» (ΦΕΚ 125, τ. Α΄),
- β΄) τις διατάξεις του ν. 4939/2022 για την υποδοχή, τη διεθνή προστασία πολιτών τρίτων χωρών και ανιθαγενών και την προσωρινή προστασία σε περίπτωση μαζικής εισροής εκτοπισθέντων αλλοδαπών (Α΄ 111/10.06.2022)
- γ΄) τις διατάξεις της Υπουργικής Απόφασης οικ. 3385/2018 «Κανονισμός λειτουργίας Υπηρεσίας Ασύλου» (ΦΕΚ 417, τ. Β΄),
- δ΄) τα από 03/08/2023 ΥΠΥ01 έγγραφα της ΥπΥΤ (Καταγραφή προσωπικών στοιχείων) των οποίων έλαβαν γνώση οι ανωτέρω,
- ε΄) την από 03/08/2023 αίτηση της ανωτέρω ενήλικης αιτούσας για τον εαυτό της καθώς και εξ ονόματος του ανήλικου τέκνου της,
- στ΄) τις από 26/06/2024 και 18/10/2024 καταγραφές προσωπικής συνέντευξης της αιτούσας, μαγνητοφωνημένες,
- ζ΄) τα σχετικά έγγραφα που προσκόμισαν οι ανωτέρω,
- η΄) όλα τα στοιχεία του διοικητικού φακέλου τους.

# Annex 8. Error message displayed when attempting to book appointment for registration of asylum claim at Malakasa Reception and Identification Centre (RIC), October 2024







καταγραφής είναι τα αραβικά.

Επειδή γνωρίζω ότι δεν γίνονται καταγραφές ελλείψει διερμηνέων, θα μπορούσατε να μου απαντήσετε στο παρόν ότι δεν μπορεί να προγραμματιστεί ραντεβού για αυτόν τον λόγο, ώστε να έχει μια απάντηση ο κύριος στα χέρια του από την Υπηρεσία σας σε περίπτωση ελέγχου από την αστυνομία; Σας ευχαριστώ εκ των προτέρων.

Με εκτίμηση, Αθηνά Καλογρίδη



www.equallegalaid.org



Providing legal aid to displaced persons

Defending the right to asylum

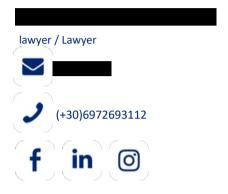
# Annex 10.2. Unofficial translation of email from Thrace Regional Asylum Office to Equal Legal Aid



As I know that no recordings are made in the absence of interpreters, could you answer me here that appointment cannot be scheduled for this reason, so that the gentleman has an answer in his hands from your service in case of an inspection by the police?

Thank you in advance. Yours

sincerely,



www.equallegalaid.org



Providing legal aid to displaced persons

Defending the right to asylum

Θεσσαλονίκη 08 Νοεμβρίου 2024

## ΑΝΑΚΟΙΝΩΣΗ

Το Διοικητικό Συμβούλιο του Δικηγορικού Συλλόγου Θεσσαλονίκης στην υπ' αριθμ.183/07.11.2024 συνεδρίασή τοι, λαμβάνοντας υπόψη ότι από Νοέμβριο 2023 δεν έχουν καταβληθεί οι αποζημιώσεις στους δικηγόρους των Υπηρεσιών Μητρώου

Ασύλου του Υπουργείου Μετανάστευσης και Ασύλου, που παρέχουν, βάσει των διεθνών συμβάσεων που έχει κυρώσει η Χώρα, δωρεάν νομική συνδρομή σε δεύτερο βαθμό στους αιτούντες άσυλο, ενώ τα σχετικά ευρωπαϊκά ιδίως κονδύλια έχουν εκταμιευθεί Αποφάσισε

την αποχή των δικηγόρων-μελών τους που παρέχουν τις υπηρεσίες τους στο Μητρώο Ασύλου, από τα καθήκοντά τους, από Δευτέρα 11.11.2024 μέχρι και Παρασκευή 29.11.2024, οπότε θα συγκληθεί η Ολομέλεια, η οποία θα αποφασίσει επί του θέματος, ανάλογα με την εξέλιξη ως προς την καταβολή των οφειλόμενων αποζημιώσεων.

Για το Διοικητικό Συμβούλιο

Ο Πρόεδρος

Ο Γενικός Γραμματέας

Δημήτριος Κ. Φινοκαλιώτης

Χρήστος Ε. Βρίκος

Θεσσαλονίκη 06 Δεκεμβρίου 2024

# ΑΝΑΚΟ Ι ΝΩΣΗ

Το Διοικητικό Συμβούλιο του Δικηγορικού Συλλόγου Θεσσαλονίκης στην υπ' αριθμ.189/05.12.2024 συνεδρίασή του, λαμβάνοντας υπόψη ότι από Νοέμβριο 2023 δεν έχουν καταβληθεί οι αποζημιώσεις στους δικηγόρους των Υπηρεσιών Μητρώου

Ασύλου του Υ**πουργείου Μετανάστευσης και Ασύλου**, που παρέχουν, βάσει των διεθνών συμβάσεων που έχει κυρώσει η Χώρα, δωρεάν νομική συνδρομή σε δεύτερο βαθμό στους αιτούντες άσυλο, ενώ τα σχετικά ευρωπαϊκά ιδίως κονδύλια έχουν εκταμιευθεί

## Αποφάσισε

την ΠΑΡΑΤΑΣΗ της αποχή των δικηγόρων-μελών τους που παρέχουν τις υπηρεσίες τους στο Μητρώο Ασύλου, από τα καθήκοντά τους, μέχρι και την Τρίτη 31.12.2024. Για περαιτέρω

αποχή, θα συγκληθεί η Ολομέλεια, η οποία θα αποφασίσει επί του θέματος, ανάλογα με την εξέλιξη ως προς την καταβολή των οφειλόμενων αποζημιώσεων.

Για το Διοικητικό Συμβούλιο

Ο Πρόεδρος

Ο Γενικός Γραμματέας

Δημήτριος Κ. Φινοκαλιώτης Χρήστος Ε. Βρίκος

Θεσσαλονίκη 08 Ιανουαρίου 2025

## ΑΝΑΚΟ Ι ΝΩΣΗ

# Το Διοικητικό Συμβούλιο του Δικηγορικού Συλλόγου

Θεσσαλονίκης στην υπ' αριθμ.193/07.01.2025 συνεδρίασή του, λαμβάνοντας υπόψη ότι από Νοέμβριο 2023 δεν έχουν καταβληθεί οι αποζημιώσεις στους δικηγόρους των Υπηρεσιών Μητρώου Ασύλου του Υπουργείου Μετανάστευσης και Ασύλου, που παρέχουν, βάσει των διεθνών συμβάσεων που έχει κυρώσει η Χώρα, δωρεάν νομική συνδρομή σε δεύτερο βαθμό στους αιτούντες άσυλο, ενώ τα σχετικά ευρωπαϊκά ιδίως κονδύλια έχουν εκταμιευθεί

# Αποφάσισε

την **ΠΑΡΑΤΑΣΗ** της αποχή των δικηγόρων-μελών τους που παρέχουν τις υπηρεσίες τους στο **Μητρώο Ασύλου**, από τα καθήκοντά τους, **μέχρι και την Κυριακή 12.01.2025**. Για περαιτέρω αποχή, θα συγκληθεί η Ολομέλεια, η οποία θα αποφασίσει επί του θέματος, ανάλογα με την εξέλιξη ως προς την καταβολή των οφειλόμενων αποζημιώσεων.

# Για το Διοικητικό Συμβούλιο

Ο Πρόεδρος Ο Γενικός Γραμματέας Δημήτριος Κ. Φινοκαλιώτης Χρήστος Ε. Βρίκος

Θεσσαλονίκη 17 Ιανουαρίου 2025

## ΑΝΑΚΟ Ι ΝΩΣΗ

# Το Διοικητικό Συμβούλιο του Δικηγορικού Συλλόγου

Θεσσαλονίκης στην υπ' αριθμ.194/16.01.2025 συνεδρίασή του, λαμβάνοντας υπόψη ότι από Νοέμβριο 2023 δεν έχουν καταβληθεί οι αποζημιώσεις στους δικηγόρους των Υπηρεσιών Μητρώου Ασύλου του Υ*πουργείου Μετανάστευσης και* **Ασύλου**, που παρέχουν, βάσει των διεθνών συμβάσεων που έχει κυρώσει η Χώρα, δωρεάν νομική συνδρομή σε δεύτερο βαθμό στους αιτούντες άσυλο, ενώ τα σχετικά ευρωπαϊκά ιδίως κονδύλια έχουν εκταμιευθεί

## Αποφάσισε

την ΠΑΡΑΤΑΣΗ της αποχή των δικηγόρων-μελών τους που παρέχουν τις υπηρεσίες τους στο Μητρώο Ασύλου, από τα καθήκοντά τους, μέχρι και την Παρασκευή 24.01.2025. Για περαιτέρω αποχή, θα συγκληθεί η Ολομέλεια, η οποία θα αποφασίσει επί του θέματος, ανάλογα με την εξέλιξη ως προς την καταβολή των οφειλόμενων αποζημιώσεων.

Για το Διοικητικό Συμβούλιο

Ο Πρόεδρος

Ο Γενικός Γραμματέας

Δημήτριος Κ. Φινοκαλιώτης Χρήστος Ε. Βρίκος