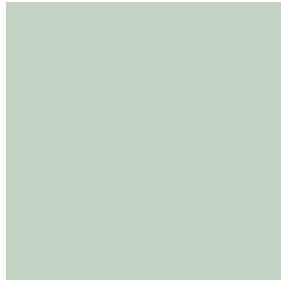


2024 UPDATE

CYPRUS



COUNTRY REPORT

Acknowledgements & Methodology

Since 2017 and up to 2024, updates of this report were written by Corina Drousiotou, Coordinator and Senior Legal Advisor, and Manos Mathioudakis, Senior Social Advisor, of the Cyprus Refugee Council and edited by ECRE. The first version of this report and the first two updates were written by Corina Drousiotou and Manos Mathioudakis at NGO Future Worlds Center and edited by ECRE.

All information provided in this report is based on direct assistance provided to asylum applicants and beneficiaries of international protection as well as information received for advocacy interventions and studies/assessments, and on information obtained from the authorities. Information on detention is based on monitoring visits to Menogia Detention Centre; information on the Kofinou Reception Centre from monitoring visits and information on the First Registration Centre, Pournara in Kokkinotrimithia from the vulnerability assessments carried out by CYRC.

The 2024 update to the AIDA country report on Cyprus was shared with the Deputy Ministry of Migration and International Protection to provide an opportunity for comments. Any feedback received was reviewed by the author and, where appropriate, incorporated into the final version of the report.

The information in this report is up-to-date as of 31 December 2024, unless otherwise stated.

The Asylum Information Database (AIDA)

The Asylum Information Database (AIDA) is managed by the European Council on Refugees and Exiles (ECRE). It aims to provide up-to date information which is accessible to researchers, advocates, legal practitioners and the general public through the dedicated website www.asylumineurope.org. It covers 23 countries, including 19 EU Member States (AT, BE, BG, CY, DE, ES, FR, GR, HR, HU, IE, IT, MT, NL, PL, PT, RO, SE, and SI) and 5 non-EU countries (Serbia, Switzerland, Türkiye, Ukraine and the United Kingdom). The database also seeks to promote the implementation and transposition of EU asylum legislation reflecting the highest possible standards of protection in line with international refugee and human rights law and based on best practice.



This report is part of the Asylum Information Database (AIDA), funded by the European Union's Asylum, Migration and Integration Fund (AMIF) and ECRE. The contents of this report are the sole responsibility of ECRE and can in no way be taken to reflect the views of the European Commission.



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Glossary & List of Abbreviations

Recourse	Judicial review of administrative acts before the Administrative Court and the International Protection Administrative Court.
AIU	Asylum and Immigration Unit (Police force)
ARC	Alien's Registration Certificate
ATD	Alternatives To Detention
BIP	Beneficiary of International Protection
CAP	Community Assessment and Placement Model
CAT	United Nations Committee against Torture
CoE	Council of Europe
COI	Country of Origin Information
CPT	European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment
CRMD/MD	Civil Registry and Migration Department Τμήμα Αρχείου Πληθυσμού και Μετανάστευσης As of May 2024: Migration Department Τμήμα Μετανάστευσης
CyRC	Cyprus Refugee Council
EASO	European Asylum Support Office
ECHR	European Convention on Human Rights
ECtHR	European Court of Human Rights
EDAL	European Database of Asylum Law
EMN	European Migration Network
EPIM	European Programme on Integration and Migration
EUAA	European Union Agency for Asylum (ex-European Asylum Support Office, EASO)
FGM	Female Genital Mutilation
FWC	Future Worlds Center
IDC	International Detention Coalition
IPAC	International Protection Administrative Court Διοικητικό Δικαστήριο Διεθνούς Προστασίας
IRCT	International Rehabilitation Council for Torture Victims
KISA	Action for Equality, Support and Antiracism
MRC	Material Reception Conditions
RUH	Refugee Housing Unit
RoC	Republic of Cyprus
RRA	Refugee Reviewing Authority Αναθεωρητική Αρχή Προσφύγων
SWS	Social Welfare Services Υπηρεσίες Κοινωνικής Ευημερίας
TPD	Council Directive 2001/55/EC of 20 July 2001 on minimum standards for giving temporary protection in the event of a mass influx of displaced persons and on

measures promoting a balance of efforts between Member States in receiving such persons and bearing the consequences thereof

UASC	Unaccompanied and Separated Children
UNCAT	United Nations Committee against Torture
UNHCR	United Nations High Commissioner for Refugees
UNVFVT	United Nations Voluntary Fund for the Victims of Torture
WBAS	Welfare Benefits Administration Service Υπηρεσία Διαχείρισης Επιδομάτων Πρόνοιας

Statistics

Overview of statistical practice

The Asylum Service, a department of the Ministry of Interior, is the authority responsible for asylum-related statistical collection in Cyprus. The below statistics have been provided by the Asylum Service.

Applications and granting of protection status at first instance: figures for 2024 (1)

	Applicants in 2024 (2)	Pending at end of 2024	Total people affected by decisions in 2024 (3)	Total in merit (4)	Total rejection (5)	In merit rejection (6)	Refugee status	Subsidiary protection
Total	8,664	20,576	16,103	9,948	11,974	6,164	1,316	2,466

Breakdown by countries of origin of the total numbers

Syria	4,277	13,793				16	48	1,756
Nigeria	554	288				995	77	6
Afghanistan	446	1280				70	183	21
Iran	443	586				96	86	3
Somalia	366	486				255	143	382
DR Congo	316	1,816				1,487	72	9
Cameroon	223	407				1,490	127	144
India	197	25				83	1	1
Pakistan	195	19				84	6	6
Bangladesh	191	30				64	5	0

Source: Asylum Service.

Note 1: All statistics concern people, including children and dependents.

Note 2: "Applicants in year" refers to the total number of applicants, and not only to first-time applicants.

Note 3: Statistics on decisions cover the decisions taken throughout the year, regardless of whether they concern applications lodged that year or in previous years.

Note 4: Includes decisions granting refugee status, subsidiary protection and rejections.

Note 5: includes all rejections decisions, including inadmissibility and withdrawals.

Note 6: These only include negative decisions on the merit of the application. It does *not* cover inadmissibility decisions.

Applications and granting of protection status at first instance: rates for 2024

	Overall rejection rate (2)	In merit rejection rate (1) (3)	Overall protection rate (2)	In merit protection rate (1) (3)	Refugee rate (1)	Subsidiary protection rate (1)
Total	74.35%	61.96%	23.49%	38.03%	13.23%	24.79%
Breakdown by countries of origin of the total numbers						
Syria	0.09%				0.29%	14.68%
Nigeria	6.17%				0.64%	0.04%
Afghanistan	0.43%				0.98%	0.21%
Iran	0.59%				0.48%	0.01%
Somalia	1.58%				0.71%	3.38%
DR Congo	9.23%				0.57%	0.08%
Cameroon	9.25%				1.02%	0.82%
India	0.51%				0.01%	0.01%
Pakistan	0.52%				0.06%	0.01%
Bangladesh	0.39%				0.03%	0%

Source of the percentages: Cyprus Refugee Council

Note 1: These rates are calculated based on in merit decisions only, excluding non in merit rejections.

Note 2: These rates are calculated based on total decisions.

Note 3: See [Admissibility procedure](#).

Gender/age breakdown of the total number of applicants: 2024

	Men	Women
Number	6,487	2,177
Percentage	74%	26%

	Adults	Children	
		Accompanied	Unaccompanied
Number	6,102	844	656
Percentage	80%	11%	9%

Source: Cyprus Asylum Service, percentages by ECRE

Note 1: The gender breakdown concerns applicants that entered the First Reception Center, Pournara. It does not include applicants that entered or remained legally in Cyprus.

Note 2: The gender breakdown (Men/Women) applies to all applicants, not only adults.

First instance and appeal decision rates: 2024

It should be noted that, during the same year, the first instance and appeal authorities handle different caseloads. Thus, the decisions below do not concern the same applicants. Contrary to the table p8 (which presented numbers regarding people affected by decisions), this table is based on the number of decisions (one decision may affect multiple asylum applicants).

	First instance	Appeal
	Number	Number
Total number of decisions	13,612	4,672
Positive decisions		
• <i>Refugee status</i>	803	25
• <i>Subsidiary protection</i>	2,020	4
• <i>Other (1)</i> ¹		
Negative decisions	5,616	1,499
Explicit Withdrawal/ Implicit Withdrawal	2,659	2,043/1,061

Source: Asylum Service and IPAC

¹ Order to Review, see section below on [Appeals](#).

* The total number of decisions includes all decisions issued by the Asylum service and the IPAC, including positive decisions, rejections, implicit and explicit withdrawals and decisions on inadmissible applications.

Note: If the IPAC accepts the appeal, the decision of the Asylum Service will be cancelled. The IPAC has the jurisdiction to either return the decision to the Asylum Service to be reviewed and a new decision will be issued or the IPAC may grant refugee status or subsidiary protection directly.²

International Protection Administrative Court (IPAC): At the end of 2020, there were 1,100 pending appeals before the IPAC. Throughout 2021, the number of pending appeals registered a sharp increase, reaching a total of 6,537 at the end of the year. In December 2022, the number of pending appeals in both the regular and accelerated procedure had reached 6,609, corresponding to 6,814 persons. In December 2023, the number of pending appeals in both the regular and accelerated procedure were 4,897 corresponding to 5,073 persons. In December 2024, the number of pending appeals in both the regular and accelerated procedure were 6,583 corresponding to 6,986 persons.

Refugee Reviewing Authority: Operations ceased in December 2020 and at the time approximately 400 cases were not concluded and were transferred back to the Asylum Service. In 2022 the Asylum Service set up a team to examine these cases. At the end of 2023, 281 decisions had been issued, of which 54 were granted refugee status; 23 subsidiary protection; 127 rejections; 28 explicit withdrawals and 49 implicit withdrawals; and 89 cases remain pending. In 2024, 52 cases were examined, which corresponded to 93 persons, of which 15 were granted refugee status; 5 granted subsidiary protection; 19 rejections; 4 explicit withdrawals; 7 implicit withdrawals; 1 unequivocal renunciation of subsidiary protection, and; 1 was cessation of subsidiary protection. 37 cases remained pending by the end of 2024.³

² Article 11 IPAC Law.

³ Information provided by the Cyprus Asylum Service.

Overview of the legal framework

Main legislative acts relevant to asylum procedures, reception conditions, detention, and content of protection

Title in English	Original Title (GR)	Abbreviation	Web Link
Refugee Law 2000 (6(I)/2000)	Ο περί Προσφύγων Νόμος του 2000 (6(I)/2000)	Refugee Law	http://bit.ly/1O3Odb4 (GR)
Aliens and Immigration Law (Cap.105)	Ο περί Αλλοδαπών και Μεταναστεύσεως Νόμος (ΚΕΦ.105)	Aliens and Immigration Law	http://bit.ly/1IXTPnM (GR)
Rights of Persons who are Arrested and Detained Law 2005 (163(I)/2005)	Ο περί των Δικαιωμάτων Προσώπων που Συλλαμβάνονται Φκαι Τελούν υπό Κράτηση Νόμος του 2005 (163(I)/2005)		http://bit.ly/1IXTWQj (GR)
Legal Aid Law 2002 (165(I)/2002)	Ο Περί Νομικής Αρωγής Νόμος του 2002 (165(I)/2002)	Legal Aid Law	http://bit.ly/1CEeWu6 (GR)
Advocates Law (Cap.2)	Ο περί Δικηγόρων Νόμος (ΚΕΦ.2)		http://bit.ly/1K4yryl (GR)
General Administrative Law Principles Law 1999 (158(I)/1999)	Ο περί των Γενικών Αρχών του Διοικητικού Δικαίου Νόμος του 1999 (158(I)/1999)		http://bit.ly/1Gjthap (GR)
Law on the establishment and operation of the Administrative Court 2015 (131(I)/2015)	Ο περί της Ίδρυσης και Λειτουργίας Διοικητικού Δικαστηρίου Νόμος του 2015 (131(I)/2015)	Administrative Court Law	http://bit.ly/1VsDv68 (GR)
Law on the Establishment and Operation of the Administrative Court for International Protection 2018 (73(I)/2018)	Ο περί της Ίδρυσης και Λειτουργίας Διοικητικού Δικαστηρίου Διεθνούς Προστασίας Νόμος του 2018 (73(I)/2018)	IPAC Law	https://bit.ly/2ttWcwb (GR)
Regulations on the Operation of the Administrative Court for International Protection 2019 (3/2019)	Οι περί της Λειτουργίας του Διοικητικού Δικαστηρίου Διεθνούς Προστασίας Διαδικαστικοί Κανονισμοί του 2019 (3/2019)	IPAC Regulations	https://bit.ly/3Fnmlq (GR)
Civil Registry Law 2002 (141(I)/2002)	Ο Περί Αρχείου Πληθυσμού Νόμος του 2002 (141(I)/2002)	Civil Registry Law	http://bit.ly/2IC2uDr (GR)

The Minimum Guaranteed Income and the General Provisions on Social Benefits Law 2014 (109 (I) / 2014)	Ο Περί Ελάχιστου Εγγυημένου Εισοδήματος και Γενικότερα περί Κοινωνικών Παροχών Νόμος του 2014 (109(I)/2014)	GMI Law	http://bit.ly/2ETLIE1 (GR)
Council Regulation (EC) No 866/2004 on a regime under Article 2 of Protocol No 10 of the Act of Accession as last amended by Council Regulation (EC) No 587/2008 (OJ L 163/1)		Green Line Regulation	https://bit.ly/49K4nWR (EN)
Administration of Justice Law (Various Provisions) 1964 (33/1964)	Ο περί Απονομής της Δικαιοσύνης (Ποικίλες Διατάξεις) Νόμος του 1964 (33/1964)	Administration of Justice Law	https://tinyurl.com/5d5w2646
National Health Law 2001 (89(I)/2001)	Ο Περί Γενικού Συστήματος Υγείας Νόμος του 2001 (89(I)/2001)	GESY Law	Available here
Law on the Establishment of the Deputy Ministry of Migration and International Protection	Ο περί Ίδρυσης Υφυπουργείου Μετανάστευσης και Διεθνούς Προστασίας και Συναφών Θεμάτων Νόμος του 2024 (23(I)/2024)	Deputy Ministry of Migration and International Protection Law	Available here Available here

Main implementing decrees relevant to asylum procedures, reception conditions, detention and content of protection

Title in English	Original Title (GR)	Abbreviation	Web Link
Ministerial Decision 312/2023, pursuant to art. 9Θ of the Refugee Law	ΚΔΠ 312/2023, Διάταγμα δυνάμει του άρθρου 9Θ 2(α) και (β) του περί Προσφύγων Νόμου, Ε.Ε. Παρ.ΙΙΙ(1), Αρ. 5825, 29/09/2023	Access to Labour	https://tinyurl.com/ycycztjy (GR)
Ministerial Decision No. 93.451, Strategy for Managing Migration Flows and Providing Material Reception Conditions to Applicants for International Protection.	Στρατηγική Διαχείρισης Μεταναστευτικών Ροών και Παροχής Υλικών Συνθηκών Υποδοχής σε Αιτούντες Διεθνούς Προστασίας.	Material reception Conditions	https://bit.ly/3ZQUdQa (GR)

Ministerial Decree 202/2022 pursuant to Article 12Btris of the Refugee Law	ΚΔΠ 202/2022, Το περί Ασφαλών Χωρών Ιθαγένειας Διάταγμα του 2022, Ε.Ε. Παρ.ΙΙΙ(1), Αρ. 5703, Σελ. 1381, 27/5/2022	Safe Countries	https://bit.ly/3JongDw (GR)
Ministerial Decree 413/2021 pursuant to Article 9Θ(2)(α) and (b) of the Refugee Law	ΚΔΠ 413/2021, Διάταγμα δυνάμει του άρθρου 9Θ 2(α) και (β) του περί Προσφύγων Νόμου, 04/10/2021	Labour Sectors Asylum Applicants are permitted to work	http://www.cylaw.org/KDP/2021.html (GR)
Ministerial Decree 297/2019 pursuant to Article 13A(1A) of the Refugee Law	Διάταγμα δυνάμει του άρθρου 13Α(1Α) των περί Προσφύγων Νόμων του 2000 έως 2019, Κ.Δ.Π. 297/2019	EASO	http://bit.ly/3c9bpb7 (GR)
Ministerial Decree Κ.Δ.Π. 308/2018 pursuant to Article 9Θ(1)(b) of the Refugee Law	Απόφαση δυνάμει του άρθρου 9Θ(1)(β) των περί Προσφύγων Νόμων του 2000 έως 2018	Access to Labour for asylum applicants	https://bit.ly/2V7Wu7A (GR)
State Medical Institutions and Services General Regulations 2000-2013	Οι Περί Κυβερνητικών ιατρικών Ιδρυμάτων και Υπηρεσιών Γενικοί κανονισμοί του 2000-2013		http://bit.ly/1RwrE4U (GR)
Medical Institutions and Services (Regulations and Fees) 1978-2013	Οι Περί ιατρικών Ιδρυμάτων και Υπηρεσιών (Ρυθμίσεις και Τέλη) Νόμοι του 1978 έως 2013		http://bit.ly/1M8f0Wd (GR)
Ministerial Decrees issued based on the Quarantine Law, Cap 260	Διατάγματα βάσει του περί Λοιμοκάθαρσης Νόμος (ΚΕΦ.260)		http://bit.ly/2NFLHnh (GR)

Overview of the main changes since the previous report update

The report was previously updated in May 2024.

International protection

- ❖ **Deputy Ministry of Migration and International Protection:** Until 2024, all issues related to migration and international protection where the responsibility of departments and services that fell under the mandate of the Ministry of Interior. In June 2024, a new deputy ministry was established, the Deputy Ministry of Migration and International Protection, which is responsible for the overall management of migration and asylum issues including a comprehensive strategy for migration and asylum; reception and hospitality issues; asylum procedures; integration of persons residing legally in the Republic; return of persons illegally residing in the Republic to their countries of origin. Coordinating and monitoring the application of EU law in matters falling within its competences.
- ❖ **Key international protection statistics:** The backlog of pending asylum applications remains high, with long processing periods, with the exception of applicants examined under accelerated procedures. In 2024, the number of asylum applications submitted concerned 8,664 persons and the total number of decisions issued concerned 16,103 persons (1,316 refugee status, 2,466 subsidiary protection and 11,974 rejections); 20,576 asylum applicants were pending examination at year end at first instance before the Asylum Service and 6,986 at 2nd instance, before the IPAC. In 2023, the number of asylum applications submitted concerned 11,617 persons and the total number of decisions issued concerned 20,159 persons (472 refugee status, 1,859 subsidiary protection and 7,104 rejections); 26,599 asylum seekers were pending examination at year end at first instance before the Asylum Service and 5,073 at 2nd instance, before the IPAC (see [Statistics](#)).

Asylum procedure

- ❖ **Access to the territory:** In 2024, there were multiple reports of pushbacks at sea and land. Specifically, the interception and subsequent pushback of boats carrying asylum-seekers attempting to reach Cypriot shores with the risk of returnees being forcibly returned to Syria from Lebanon. Furthermore, two port police boats were sent from Cyprus to patrol off the coast of Lebanon for migrant boats. From May to November 2024, in an attempt to stem arrivals coming from the areas in the north, a certain number of persons crossing the green line were not permitted to enter the areas under the effective control of the RoC and were forced to remain in the buffer zone in extremely harsh conditions. In October 2024, the European Court of Human Right, in the case of *M.A. and Z.R. v. Cyprus*, found that Cyprus violated the European Convention on Human Rights when it returned to Lebanon two Syrian citizens who wanted to apply for asylum (see [Access to the territory and push backs](#)).
- ❖ **Arrivals and asylum applications:** The number of submitted asylum applications in 2024 declined once again in comparison to the applications submitted in 2023, which were close to half in comparison to 2022. The majority still arrived by irregularly crossing the 'green line', however in early 2024, for the first-time arrivals by boat were significantly higher than arrivals by crossing the 'green line' and were predominately Syrian nationals. In April 2024, due to the increase in arrivals of Syrian nationals, the government announced that the examination of asylum applications of Syrian nationals is suspended, which continues till present (see [Differential treatment of specific nationalities in the procedure](#)).

- ❖ **Returns:** In 2024, Cyprus has recorded the highest ratio of departures to arrivals among EU member states, with a rate of 179%. A total of 10,941 people left the country in 2024, according to figures released by the Ministry of Interior and the Deputy Minister of Migration and International Protection. A voluntary return programme offering incentives between 1,000 and 1,500 euros contributed to 8,213 voluntary returns in 2024, compared to 4,636 in 2022. Additionally, 2,517 individuals were relocated to other EU member states (see [Return procedure](#)).

Reception conditions

- ❖ **Reception standards:** Reception standards remain below adequate levels, exposing asylum applicants to risks of homelessness and destitution. Conditions in the reception centres improved in 2023 and 2024, however the majority of asylum applicants are hosted in the community rather than in reception centres, and often live in extremely poor conditions. The timely identification, and especially the response to the needs of vulnerable individuals, including children, both within reception facilities and in the community, is below standards (see [Reception Conditions](#)).
- ❖ **Racist attacks:** In 2024, violence against migrants continued, including frequent racist attacks especially against non-EU delivery-persons, hate speech, police profiling, incidents of police entering private accommodation to identify undocumented persons (see [Reception Conditions](#)).
- ❖ **Access to the labour market:** Following a period of 5 years (2018-2023) during which access to the labour market was permitted one month after lodging an asylum application, since October 2023 asylum applicants are permitted to access the labour market nine months after submitting their asylum application. This effort of further disengaging asylum applicants' workforce from labour market needs has led to Employers' associations expressing their concern over the possible effects of the 9-month ban on capacity of businesses to cover their staff needs and has also increased businesses' reluctance to hire asylum applicants (see [Access to the labour market](#)).
- ❖ **Children:** The number of refugee children in Cyprus, either accompanied by family members or unaccompanied/separated, is high. Gaps remain in the protection of minors, particularly in the First Reception Centre of Pournara and some of the shelters for UASC. Children remain without adequate guardianship, and are as such exposed to various risks, such as trafficking, sexual or labour exploitation. Procedures regulating the assessment of the child's best interest are also lacking (see [Special reception needs of vulnerable groups](#)).

Detention of asylum applicants

- ❖ **Statistics on detention:** The number of detained asylum applicants remains low, however alternatives to detention are still not systematically applied even in cases of vulnerable persons (see [Alternatives to detention](#)).
- ❖ **Detention conditions:** Asylum applicants continue to be detained in holding cells in police stations and in airports across the country in sub-standard conditions. Furthermore, they face obstacles in accessing asylum procedures and legal remedies to challenge detention and/or rejected asylum applications (see [Detention of Asylum Applicants](#)).

Content of international protection

- ❖ **Integration opportunities:** The lack of integration opportunities remains one of the weakest elements of the national asylum system. A new integration plan, which was developed under EU funding with the aim of adopting a multi-year integration strategy, was finalised but eventually abandoned. In 2024 there were reports of the integration plan being revised but it has yet to be published (see [Content of International Protection](#)).

- ❖ **Naturalisation:** The 2023 amendments to the Law, which increased the requirements for applying for naturalisation, have made it extremely difficult if not impossible for BIPs to satisfy. This includes BIPs that came to Cyprus at a young age and grew up in Cyprus or were born in Cyprus. Specifically, the required years of residence have been increased from 5 years to 8 years and the years as an applicant for international protection, holder of subsidiary protection, or temporary protection are not counted. This will be an obstacle for the majority of BIPs as they are subsidiary protection holders, including Syrian nationals. Furthermore, the majority of BIPs enter in an irregular manner, which is considered under the amended Law as an indication of not 'good character'. Finally, the majority of BIPs will have received at some point financial assistance either as an applicant of international protection or later as a BIP which is considered as an indication that the applicant does not have sufficient financial resources (see [Naturalisation](#)).
- ❖ **Family reunification:** Access to family reunification remains a lengthy procedure for refugees. Beneficiaries of subsidiary protection (98% of Syrians present in the country) are not eligible for family reunification and often resort to irregular means to obtain reunification with family members (see [Family reunification](#)).

Temporary protection

The information given hereafter constitute a short summary of the main changes to the annex on Temporary Protection in Cyprus. For further information, see [Annex on Temporary Protection](#).

Temporary protection procedure

- ❖ **Legal framework:** The TPD was transposed into the Refugee Law in 2004 and activated in March 2022. It is available for Ukrainian nationals who were residing in Ukraine before 01 February 2022 and third-country nationals who benefited from international protection or equivalent national protection in Ukraine, including stateless persons. Applications for TP can be made online and a residence permit will be issued soon after. Temporary Protection has been extended automatically until March 2026.
- ❖ **Registrations for temporary protection:** As of 31 December 2022, 13,893 individuals were registered for temporary protection and as of 28 February 2023, 15,338 were registered for temporary protection. From the activation of the Temporary Protection Directive until 31 December 2023, 20,923 individuals have been registered in Cyprus making it one of the highest per capita recipients of Ukrainian refugees.
As of 31 December 2024, 24,823 persons individuals have been registered for temporary protection.

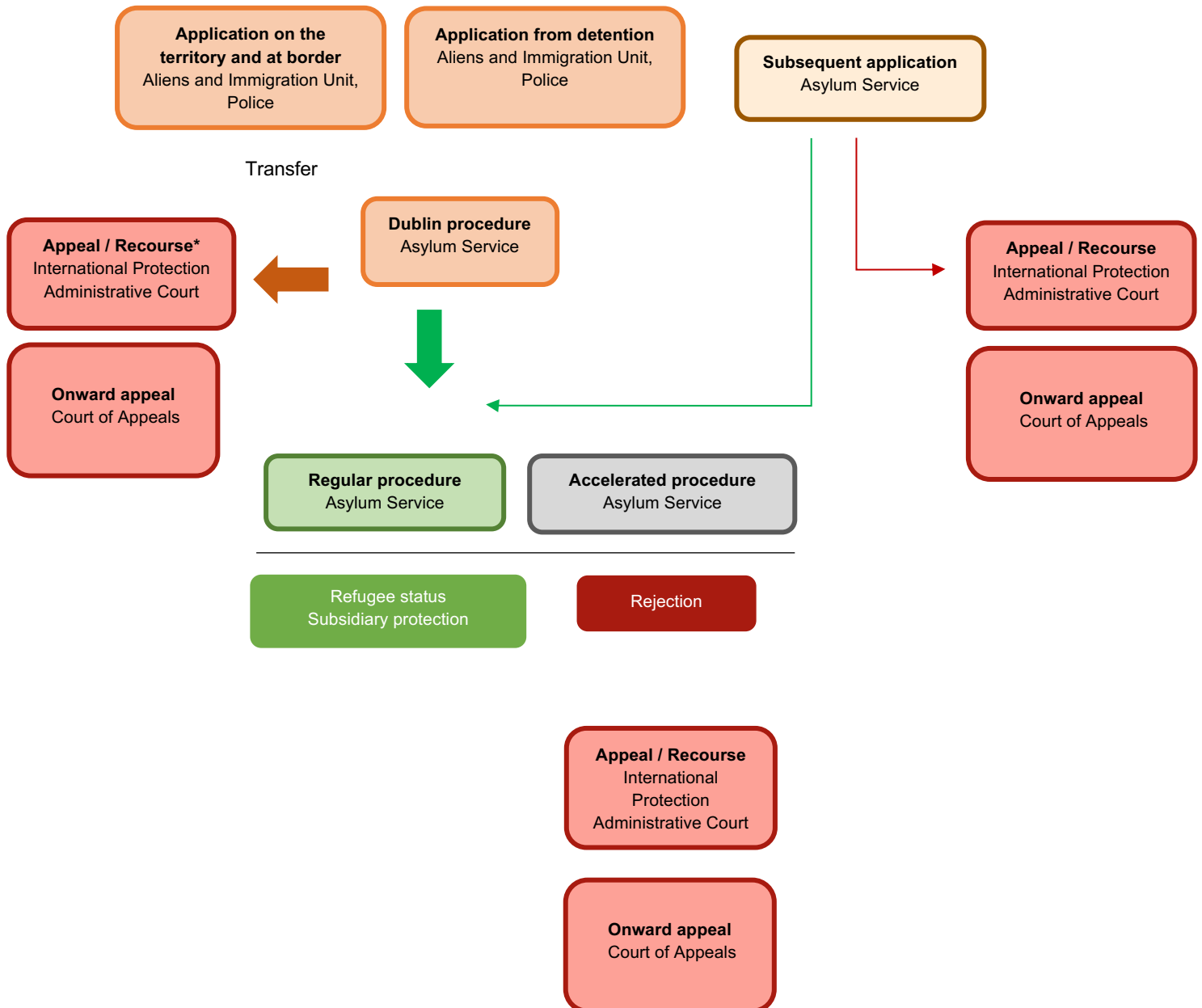
Content of temporary protection

- ❖ **Access to rights:** TP holders have access to all rights included in the Directive, upon registration and in most cases without obstacles. Regarding financial support, a small one-off amount is provided and accommodation options are limited. However, access to the labour market is immediate which has facilitated a significant number of TP holders to secure employment. Access to education is immediate but with limited support measures.

Asylum Procedure

A. General

1. Flow chart



2. Types of procedures

Indicators: Types of Procedures

1. Which types of procedures exist in your country?

❖ Regular procedure:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
▪ Prioritised examination: ⁴	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
▪ Fast-track processing: ⁵	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
❖ Dublin procedure:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
❖ Admissibility procedure:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
❖ Border procedure:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
❖ Accelerated procedure: ⁶	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
❖ Other:		
2. Are any of the procedures that are foreseen in the law, not being applied in practice?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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Cyprus does not have a border procedure: the dividing line is not considered a border and is not guarded as such. The prioritised examinations of well-founded cases, as well as fast-track processing, is carried out within the framework of the regular procedure.

3. List of the authorities that intervene in each stage of the procedure

Stage of the procedure	Competent authority (EN)	Competent authority (GR)
Application at entry points	Aliens and Immigration Unit, Police	Υπηρεσία Αλλοδαπών και Μετανάστευσης
Application on the territory	Aliens and Immigration Unit, Police	Υπηρεσία Αλλοδαπών και Μετανάστευσης
Dublin procedure	Asylum Service	Υπηρεσία Ασύλου
Accelerated procedure	Asylum Service	Υπηρεσία Ασύλου
Refugee status determination	Asylum Service	Υπηρεσία Ασύλου
Judicial appeal	International Protection Administrative Court	Διοικητικό Δικαστήριο Διεθνούς Προστασίας
Onward appeal	Court of Appeals	Εφετείο
Subsequent application (admissibility)	Asylum Service	Υπηρεσία Ασύλου
Revocation / Withdrawal	Asylum Service	Υπηρεσία Ασύλου

⁴ For applications likely to be well-founded or made by vulnerable applicants. See Article 31(7) recast Asylum Procedures Directive.

⁵ Accelerating the processing of specific caseloads as part of the regular procedure.

⁶ Labelled as “accelerated procedure” in national law. See Article 31(8) recast Asylum Procedures Directive.

4. Determining authority

Name in English	Number of staff	Ministry responsible	Is there any political interference possible by the responsible Minister with the decision making in individual cases by the determining authority?
Asylum Service	167	Ministry of Interior	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Source: Asylum Service.

Until 2024, all issues related to migration and international protection were the responsibility of departments and services that fell under the mandate of the Ministry of Interior. In June 2024, a new deputy ministry was established, the Deputy Ministry of Migration and International Protection, with the following mandate:⁷

- ❖ Design and implementation of a comprehensive strategy for migration and asylum, which includes reception and hospitality issues, asylum procedures, the integration of persons residing legally in the Republic, the return of illegally residing immigrants to their countries of origin, as well as the issues of legal immigration.
- ❖ The management of migration and asylum issues.
- ❖ Coordinating the monitoring and application of EU law in matters falling within its competences.
- ❖ The operation and management of reception and accommodation centres for applicants of international protection, as well as accommodation centres for unaccompanied minors and vulnerable persons.
- ❖ The establishment of bilateral agreements with third countries for cooperation in matters of migration, asylum and returns, following the approval and authorization of the Council of Ministers.
- ❖ The preparation of an integration strategy for citizens of third countries who reside legally in the Republic and the coordination of the implementation of the necessary actions for its implementation, in cooperation with ministries, services and authorities of the state.

The Asylum Service was a department of the Ministry of Interior and has now come under the Deputy Ministry. The Asylum Service is responsible for the first instance determination of asylum applications, including the examination of the Dublin Regulation criteria. Pursuant to the latest amendments to the Refugee Law, the Asylum Service is entitled to issue a return decision together with a negative decision in a single administrative act. The Asylum Service also offers the applicant the option of voluntary return to their country of origin. If no response is received by the rejected applicant about voluntary return or request for assisted voluntary return, then the return decision is referred to the Aliens and Immigration Unit (AIU) who is in charge of execution of return decisions and deportation orders. The Asylum Service is also responsible, per the Refugee Law, for the operation of reception and accommodation centres for asylum applicants, as well as for coordinating all other competent authorities on asylum issues.⁸

In 2024, in addition to the support staff, the Asylum Service includes the Head of the Asylum Service, 16 Administrative Officers and 105 Asylum Officers on fixed-term contracts. Of the above staff, 70 officers are examiners, while the rest deal with other issues such as the Dublin Unit, relocation, tenders, Reception / Hospitality Centers, and other administrative tasks. In addition, the Asylum Service, during the 2024,

⁷ GOV CY, Υφυπουργείο Μετανάστευσης και Διεθνούς Προστασίας, available in Greek [here](#).

⁸ EASO, *Operating Plan 2022-2024 agreed by the European Asylum Support Office and Republic of Cyprus*, December 2021, available at: <https://bit.ly/3U2EDPF>.

was supported by EUAA staff as well as by Contract staff such as for example the security guards and the staff of the Management Company CODECA at the Reception / Hospitality Centres.⁹

Cyprus has received operational support by the EASO/EUAA since 2014. The 2022-2024 operational plan was amended twice, to reflect the changes in the operational context in light of the invasion of Ukraine.¹⁰ Upon request by the Cypriot authorities, in December 2024, the EUAA and Cyprus agreed on an operational plan for 2025-2026, with continued support in asylum procedures and reception, while planning and allowing for the gradual phase-out of the Agency's support. Notably, EUAA support on TPD is to gradually phase out.¹¹

Throughout 2024, the EUAA deployed 225 experts in Cyprus,¹² mostly external experts (163). The majority of them were case experts (63), intermediate asylum second instance support experts (18), junior asylum and/or reception operations experts (12), senior case experts (11) and a series of other support staff (intermediate asylum and/or reception statistics experts, junior asylum registration experts, etc.).¹³

As of 11 December 2024, a total of 116 EUAA experts were deployed in Cyprus, out of which 26 were case experts, 8 intermediate asylum second instance support experts, 8 junior asylum and/or reception operations experts and 7 senior case experts.¹⁴

In 2024, the EUAA delivered 66 training sessions to a total of 365 local staff members.¹⁵

The Ministry of Interior has an input in setting the policy for asylum applicants from specific countries of origin such as when there is an influx of asylum applicants from a country in conflict (*i.e.*, **Iraq, Syria**). Since mid-2019 and still in 2024, the Ministry of Interior has played a major role in asylum issues, including the determination of the countries to be included in the safe countries list. Since the establishment of the Deputy Ministry of Migration and International Protection, the latter is now responsible for such decisions. All the decisions taken by Asylum Service caseworkers and EUAA case workers on asylum claims need to be confirmed by the Head of the Asylum Service¹⁶ or a case worker authorised to do so.¹⁷ In practice, all cases are confirmed and signed off by senior caseworkers with such authorisation who are not actively involved in working on the case.

There is currently no formal quality assurance unit established at the Asylum Service. While discussions have started on establishing such a unit, they have been stalled due to a lack of capacity and discussions on the nature of the quality assurance work. However, part of the responsibility introduced for team leaders is to monitor the consistency of decisions of junior staff. No progress was observed in 2024.

5. Short overview of the asylum procedure

The asylum procedure in Cyprus is a single procedure whereby eligibility to both refugee status and subsidiary protection status is examined. In accordance with the Refugee Law, an asylum application is addressed to the Asylum Service and is made and lodged before the Aliens and Immigration Unit (AIU)

⁹ Information provided by Cyprus Asylum Service.

¹⁰ EUAA, *Operational Plan 2022-2024 agreed by the European Union Agency for Asylum and Cyprus*, available at: <https://bit.ly/3PT3UuO>; latest amendment available [here](#).

¹¹ EUAA, *Operational Plan 2025-2026 agreed by the European Union Agency for Asylum and Cyprus*, December 2024, available [here](#).

¹² EUAA personnel numbers do not include deployed interpreters by the EUAA in support of asylum and reception activities.

¹³ Information provided by the EUAA, 14 March 2025. In the figures above, the same persons may have been included under different profiles, if a change of profile took place in the course of 2024.

¹⁴ Information provided by the EUAA, 14 March 2025.

¹⁵ Information provided by the EUAA, 14 March 2025.

¹⁶ ECRE, *Asylum authorities: an overview of internal structures and available resources*, October 2019, available at: <https://bit.ly/3wSWjU3>.

¹⁷ Article 2, Refugee Law.

which is a department of the Police, in the city in which the applicant is residing.¹⁸ One such Unit exists in each of the five districts in Cyprus (**Nicosia, Limassol, Larnaca, Paphos, Ammochostos**). Since the establishment of **Pournara**, the First Reception Centre in **Kokkinotrimithia**, Nicosia district, in 2020, persons who have recently arrived in the areas under the effective control of the RoC in an irregular manner are referred to the Centre for registration. The services provided include identification, registration, and lodging of asylum applications, as well as medical screening and vulnerability assessments; when possible, the full assessment of the asylum application is also carried out at the Asylum Examination Centre adjacent to Pournara.

Other persons who access the country's territory in a regular manner must apply at the Aliens and Immigration Unit and will not be referred to **Pournara**. This makes up a very low percentage of asylum applicants. Persons who are residing in the country under another status and wish to apply for asylum or whose status has expired (e.g., student, work visa) will also apply at the AIU of the city they are residing.

In cases where the applicant is in prison or immigration/administrative detention, the application is made at the place of imprisonment or detention. For people detained in the Detention Centre **Menogia**, asylum applications are received directly within the facility from AIU officers, while for people in prison or detained in Police Holding Cells, who have requested to lodge an asylum application, the AIU will be notified and proceed to the prison or holding cell to receive the asylum application.

Once an application is lodged before the AIU, it is registered in the common data system, managed by the Asylum Service, and fingerprints are taken.

Specifically, the following procedures exist:

Regular and accelerated procedure: The Refugee Law provides for a regular procedure and an accelerated procedure. The decision issued by the Asylum Service can lead to recognition of refugee status, subsidiary protection status, or a rejection. As a result of the amendments to the Refugee Law which entered into force in October 2020, the Asylum Service currently issues a single negative and returns decision. The Asylum Service does not examine humanitarian status. The Migration Department examines a form of humanitarian status under the article that transposes the Returns Directive (see section: [National protection statuses](#)).

The Asylum Service is responsible for both the regular and accelerated procedures. The accelerated procedure has a specific time limit for the issuance of the decision and shorter time limits for the submission of an appeal. In practice, the accelerated procedure was never used since it was included in the Law in 2003 until it was piloted in late 2019 for persons of Georgian nationality with the intention of a wider application in 2020, however there was no significant increase in the use of accelerated procedures until late 2022. Since September 2022, the use of accelerated procedures has increased, focusing mostly on nationalities from the list of safe countries.

Dublin/admissibility procedure: According to the Refugee Law,¹⁹ during the procedure to identify the Member State responsible under the Dublin Regulation, a person has a right to remain on the territory and has access to reception conditions. Regarding asylum applicants returned to Cyprus under the Dublin Regulation, if the refugee status determination procedure was not concluded, it will resume from the stage it was paused. Until recently Dublin returnees were not detained upon return, however, in 2023 and 2024, cases of Dublin returnees being detained upon arrival have been identified.²⁰

Admissibility of a subsequent application/new elements: When a rejected asylum applicant submits a subsequent application or new elements to the initial claim, the Asylum Service examines the

¹⁸ Article 11, Refugee Law.

¹⁹ Article 9(1)(B) Refugee Law.

²⁰ Information provided by the Cyprus Refugee Council.

admissibility of such an application or elements. During the admissibility procedure the person does not have access to reception conditions.

Appeals: In order to ensure that asylum applicants in Cyprus have a right to an effective remedy, in recent years the asylum procedure was modified regarding appeals.²¹ After several changes, a specialised court, the International Protection Administrative Court (IPAC), was established and started its operations in June 2019.²² Following a negative decision on the asylum application by the Asylum Service, an asylum applicant has the right to submit an appeal before the IPAC within 30 calendar days and 15 calendar days for accelerated procedures.²³ All decisions issued by the IPAC can be appealed before the Court of Appeals within 14 days.²⁴ In 2023, the Court of Appeals began operations and replaced the jurisdiction of the Supreme Court as appellant court.²⁵

Since the amendments of October 2020, the Asylum Service issues a single asylum and returns decision. For cases examined under the regular procedure, the return decision is automatically suspended once an appeal is submitted. However, for all other decisions, an appeal does not have automatic suspensive effect and a separate application must be submitted to the IPAC requesting the right to remain pending the examination of the appeal.²⁶

The IPAC examines both points of law and fact for asylum applications and immigration detention cases. In cases of family reunification, the Court considered that it only has jurisdiction to examine points of law and not substance. For cases relating to other areas of the Refugee Law, it has yet to be clarified whether the Court examines points of law and fact, as no cases have been brought before the court. There is no specific time limit set for the issuance of a decision, but the law provides that a decision must be issued as soon as possible.²⁷

If the IPAC accepts the appeal, the decision of the Asylum Service will be cancelled. According to the Law, the Court may return the decision to the Asylum service for review, or directly grant refugee status or subsidiary protection.²⁸

The onward appeal before the Court of Appeals examines only points of law and does not have suspensive effect. An application can be submitted requesting the suspension of the execution of the decision issued by the IPAC. However, as is the case for all cases brought before the Court of Appeals, the application for suspension will be decided by the court and the judge that issued the decision that is being challenged. There have been no decisions to date in such applications in asylum related cases.²⁹

The procedure before the IPAC is judicial. Applicants can appear without legal representation or enlist the services of a registered lawyer to represent them before the Court.

²¹ Information on the procedures prior to the establishment of the IPAC can be found in previous updates of the AIDA Country Report on Cyprus. See, e.g., AIDA, Country Report: Cyprus, 2020 update, April 2021, available at: <https://bit.ly/3Jmrxtro>.

²² Law N. 73(I)/2018 on the establishment of the Administrative Court for International Protection.

²³ Article 12A, Law N. 73(I)/2018 on the establishment of the Administrative Court for International Protection.

²⁴ Administrative recourse under Article 146(1) of the Constitution of the Republic of Cyprus."

²⁵ Article 3A Administration of Justice Law. See also: Dikaosyni, *The new Court of Appeal of Cyprus*, 3 October 2019, available in Greek at: <https://tinyurl.com/98jnf3ut>.

²⁶ Article 8 Refugee Law.

²⁷ Article 31Γ(5)Refugee Law.

²⁸ Article 11 IPAC Law.

²⁹ Information provided by Cyprus Refugee Council.

B. Access to the procedure and registration

1. Access to the territory and push backs

Indicators: Access to the Territory

1. Are there any reports (NGO reports, media, testimonies, etc.) of people refused entry at the border and returned without examination of their protection needs? ☒ Yes ☐ No
2. Is there a border monitoring system in place? ☐ Yes ☒ No

Main methods of arrival

A high percentage of asylum seekers enter Cyprus from the areas not controlled by the Republic of Cyprus (RoC), in the north of the island, and then cross the “green line”/no-man’s land/Buffer Zone, in an irregular manner to the areas under the control of the RoC. The “green line” is not considered a border and although there are authorised points of crossing, these are not considered official entry points into the RoC. Crossing of the “green line” is regulated under the “Green Line” Regulation,³⁰ and requires persons to have entered the RoC in a regular manner. In order to cross the “green line” through the points of crossing, a person needs a valid visa and will be checked by police acting in the north as well as by the RoC Police. As the vast majority of persons seeking asylum do not have such a visa, they cross the “green line” in an irregular manner, often with the help of smugglers. If a person is apprehended, having entered the areas in the north that are not under the effective control of the RoC without permission from the authorities acting in the north, they will most probably be arrested and returned to Türkiye and, from Türkiye, possibly to their country of origin. As the *acquis* is suspended in the areas in the north, there is no asylum system in force.³¹

Since 2016, there have also been a small number of boat arrivals either reaching the areas not under the control of the RoC in the north – with persons then passing into the areas under the effective control of the RoC – or arriving directly to the areas under the control of the RoC. The boats initially came mainly from **Türkiye**, with an increasing number from **Lebanon** or **Syria**. Initially persons arriving by boats were often relatives of persons already residing in Cyprus, including spouses and underage children of persons with subsidiary protection.³² This is partly due to the fact that the vast majority of **Syrians** are granted subsidiary protection and this status, since 2014, does not give access to **Family Reunification**.

Boat arrivals have always constituted a small percentage of the total number of arrivals. However, in early 2024, for the first time, the arrivals by sea directly to the areas under the control of the RoC were significantly higher than arrivals crossing the green line, *i.e.*, than from the areas not controlled by the Republic of Cyprus.³³ From April 2024 onwards, following the measures taken to deter arrivals the number of boats fell significantly.³⁴

³⁰ Council Regulation (EC) No 866/2004 on a regime under Article 2 of Protocol No 10 of the Act of Accession as last amended by Council Regulation (EC) No 587/2008.

³¹ Act concerning the conditions of accession of the Czech Republic, the Republic of Estonia, the Republic of Cyprus, the Republic of Latvia, the Republic of Lithuania, the Republic of Hungary, the Republic of Malta, the Republic of Poland, the Republic of Slovenia and the Slovak Republic and the adjustments to the Treaties on which the European Union is founded - Protocol No 10 on Cyprus, 16 April 2003, [available at: https://bit.ly/2vTilJ0](https://bit.ly/2vTilJ0). The Protocol on Cyprus, attached to the Treaty of Accession signed on 16 April 2003 by the Republic of Cyprus, provides for the suspension of the application of the *acquis* in those areas of the Republic of Cyprus where the Government of the Republic does not exercise effective control.

³² Information provided by Cyprus Refugee Council.

³³ Philenews, *Migrant traffickers have changed course. What is the invasion of 458 people due to?*, 21 March 2024, available in Greek at <https://tinyurl.com/yrp9ps3j>.

³⁴ UNHCR, *Monthly Arrivals Trends in Cyprus 2024*, available [here](#). See also, Pjilenews, *Record decrease in new asylum applications in 2024 (tables)*, 14 December 2024, available in Greek [here](#).

Besides arrivals from the north, a very small number of asylum seekers enter the RoC through official points of entry (ports and airports) and then apply for asylum. In addition to recently arrived persons, there is always a number of persons already in the country who had entered and stayed under other statuses, including domestic workers, work permits, and students, and apply for asylum before or after their initial residence permit has expired.

In 2024, 3,234 persons arrived by land from the areas not under the control of the RoC and 2,868 arrived by sea directly to the areas under the control of the RoC.³⁵

Measures to deter arrivals

From 2020 onwards, in view of the increase in arrivals, successive governments have taken various measures in an attempt to deter persons from arriving in Cyprus and applying for asylum including, suspension of examination of asylum applications of specific nationalities (mainly Syrian nationals), push backs at land and sea, measures at the “green line”, restricting access to reception conditions and restricting access to the relocation scheme.³⁶

Specifically, since 2020, the Cyprus government started implementing further technologies for coastal surveillance, such as the Integrated Coastal Surveillance System. In total, the Joint Rescue Coordination Center has received €20 million in EU funding in the last 20 years, this includes projects such as the coastal surveillance system, drones, boats and the establishment of the Zenon Coordination centre in its premises.³⁷ The Zenon centre amongst other things is responsible for the control and early warning of migratory movement flow, aiming “to manage a complete surveillance, location, identification, prevention, command and control system, covering the maritime area of responsibility and jurisdiction of [the RoC]”.³⁸

In 2021, Cypriot authorities requested that the European Commission activate Article 78(3) of the Treaty on the Functioning of the European Union (TFEU) and propose provisional measures to allow Cyprus to deal with a sudden influx of third-country nationals, including the suspension of new asylum applications until the situation becomes manageable.³⁹ Concerns were raised within the European Parliament about Cyprus’ expressed intention to suspend the processing of asylum applications and, in response to the European Parliament, the European Commission stated that derogations could be possible while respecting the right to seek asylum and the principle of *non-refoulement*.⁴⁰ Ultimately, there were no developments on the ground with regards to the suspension of new asylum applications and these continue to be registered systematically.⁴¹ However, in 2022, and although never announced officially, in practice asylum applications submitted by Syrian and Afghani nationals were not examined, with extremely few exceptions,⁴² although the Ministry of Interior at the time acknowledged that Syria is not considered a safe country and that returns to Syria cannot be made.⁴³ Furthermore, the support provided by the European Commission, via the EUAA, to improve asylum procedures including the registration and examination of asylum applications continued with no reference to a suspension of asylum applications.⁴⁴ In mid-2023, the examination of cases of Syrian and Afghani nationals resumed.

³⁵ Information provided by the Cyprus Asylum Service.

³⁶ Information provided by Cyprus Refugee Council.

³⁷ JRCC, *Presentation by the Joint Rescue Coordination Center Larnaca*; JRCC, ‘2. Presentation by the Joint Rescue Coordination Center Larnaca’, available [here](#).

³⁸ BVMN, *Surveillance Technologies at European Borders: Cyprus*, 8 October 2024, available [here](#).

³⁹ FRA, *Migration: Key Fundamental Rights Concerns, Quarterly Bulletin of 01/10/21 – 31/12/21*, available at: <https://bit.ly/3Nmabf3>.

⁴⁰ EUAA *Asylum Report 2022*, p. 86, available at: <https://bit.ly/3FqA8rA>; European Parliament, *Parliamentary question - E-005330/2021*, 30 November 2021, available at <https://bit.ly/3mTzOv6>.

⁴¹ Information provided by the Cyprus Refugee Council.

⁴² Based on monthly statistics issued by the Cyprus Asylum Service.

⁴³ Ministry of Interior, *Statements by the Minister of the Interior after the end of the Parliamentary Interior Committee on immigration*, 31 March 2022, available in Greek at: <https://bit.ly/3mXvqLK>.

⁴⁴ ECRE, *Cyprus: MoU Signed with European Commission While Government Casts Blame on Asylum Applicants*, 25 February 2022, available at: <https://bit.ly/36Edga6>.

Overall, the number of arrivals declined significantly in 2023, by half in comparison to 2022, however the government emphasised the need to implement a European Union action plan for the Eastern Mediterranean in order to reduce the increased number of migrants detected on this route.⁴⁵

Regarding **measures taken at the 'Green Line'** in March 2021, the Ministry of Interior installed razor wire along the "green line" under the justification of stemming migrant crossings from the areas in the north to the areas under the effective control of the Republic of Cyprus. This measure led to criticism within Cyprus as it implies the delineation of borders and further legitimises the division of Cyprus, in addition to knowing that migration will not be solved by fences.⁴⁶ Furthermore, the measures led to reactions from the European Commission as it had not been informed contrary to the Article 10 of the Green Line Regulation which provides that "any change in the policy of the government of the republic of Cyprus on crossings of persons or goods shall only become effective after the proposed changes have been notified to the Commission and the Commission has not objected to these changes within one month".⁴⁷ Arrivals in 2021 were significantly higher than in 2020, and in 2022 the number of arrivals once again doubled compared to those of 2021, the majority of which arrived by irregularly crossing the 'green line', a testament to the fact that the installation of razor wire had little, if any, impact on arrivals.

In November 2021, Cyprus and Israel reached an agreement, under which the Israeli military would build a surveillance system to track activity along Cyprus's Green Line. According to reports, the system will monitor attempts at smuggling and illegal migration, and Cypriot authorities will be provided assistance on military intelligence.⁴⁸

Throughout 2022, other measures were announced to prevent migrants crossing the Green Line, including hiring 300 border guards to monitor the Green Line,⁴⁹ continuing the installation of the surveillance system and extending the wire fence.⁵⁰ In early 2023, it was announced that only 221 border guards fulfilled the selection criteria and were expected to take up operations in April 2023.⁵¹ Furthermore, two cameras have been installed on the Green Line, with the intention to install 100 cameras in total, to be monitored by members of the national army. According to the authorities, when migrants are identified attempting to cross the Green Line, they attempt to stop these persons from crossing or, if this is not possible, they are transferred to Pournara First Reception Center. However, the border guards have mainly been used to guard Pournara and other locations rather than the 'Green line' as initially intended.⁵²

With the change of government in 2023, it was announcement that the effectiveness of the razor wire as the measure was under discussion,⁵³ and the decision to finally remove the razor wire was announced in October 2024.⁵⁴

⁴⁵ Schengen Visa News, *490% increased arrivals since 2016*, 28 March 2023, available at <https://bit.ly/41DH8eB>; Reuters, *Cyprus unveils campaign to counter spike in asylum applicants*, 6 June 2023, available at <https://bit.ly/3POWXb8>.

⁴⁶ Dialogos, *AKEL for a fence in the dead zone: It sends dangerous political messages*, 8 March 2021, available in Greek [here](#).

⁴⁷ Cyprus Mail, *Barbed-wire controversy grows*, 12 March 2021, available at: <https://bit.ly/3m0U2ys>.

⁴⁸ Times of Israel, *Israel to build surveillance system to track activity along Cyprus's Green Line*, 5 November 2021, available at: <https://bit.ly/3Cilhf2>; Cyprus Mail, *Buffer zone surveillance deal signed with Israel (Updated)*, 5 November 2021, available at: <https://bit.ly/3HJ4eVL>; Daniel Avis, *Israel to Build Surveillance System for Cyprus Green Line*, Bloomberg, 4 November 2021, available [here](#).

⁴⁹ Phileleftheros, *Nouris is looking for 300 security guards, he found 187*, 23 November 2022, available at: <https://bit.ly/42icJSS>; Phileleftheros, *221 police guards on the Green Line*, 21 Mars 2023, available at: <https://bit.ly/3NtpkC>.

⁵⁰ Phileleftheros, *They are putting up a fence for immigrants in Athienou as well*, 20 January 2023, available at: <https://bit.ly/42eGDm>.

⁵¹ Alphanews, *They didn't find the 300 for the Green Line*, 8 February 2023, available at <https://bit.ly/3mJVw4z>
⁵² Information by Cyprus Refugee Council.

⁵³ Phileleftheros, *Ioannou will remove Nouri's barbedwire*, 1 August 2023 available in Greek at: <https://tinyurl.com/a8y65txv>.

⁵⁴ Phileleftheros, *Ministerial: The Nouri fence is leaving the Green Line*, 4 October 2024 available in Greek [here](#).

Regarding **pushbacks**, in 2020, the Cypriot authorities, for the first time, carried out pushbacks of boats carrying mainly **Syrians, Lebanese and Palestinians** who had departed from Türkiye or Lebanon.⁵⁵ In total, 9 pushbacks were carried out with one more attempt in December 2020, but due to damages the boat was eventually rescued. The practice continued in 2021, with another 9 boats reported to be pushed back carrying mainly Syrian and Lebanese nationals as well as reports of 4 persons attempting to enter the areas under the effective control of the RoC and kept in the buffer zone.⁵⁶

In 2022, 40 boats arrived in the areas under the control of the Republic. Six boats all departing from Lebanon, were identified as intercepted by the Cypriot authorities, however there may be more cases of *refoulement* which were not identified or located. Four boats were reported to have been returned to Lebanon, carrying approximately 354 persons. It has also been reported that among them were three Syrians, who were eventually returned to Syria. The other two boats continued the journey after having been intercepted by the RoC; one was reported to have reached Greece following the disembarkation of two people in Cyprus and the second was reported to have reached Türkiye.⁵⁷

In 2023, there were two incidents of pushbacks in July and August, involving three boats and 109 nationals of Syria. UNHCR stated it was “extremely concerned” over the return of more than 100 Syrian nationals from Cyprus to Lebanon without a screening to determine whether they needed legal protection and given the possibility they may be deported back to their war-wracked homeland and that deportations and transfers between states “without legal and procedural safeguards for persons who may be in need of international protection” are against international and European law.⁵⁸

In the first months of 2024, there were multiple reports of the interception and subsequent pushback of boats carrying asylum-seekers attempting to reach Cypriot shores with the risk of returnees being forcibly returned to Syria from Lebanon.⁵⁹ Furthermore, two port police boats were sent from Cyprus to patrol off the coast of Lebanon for migrant boats, which was the first mission of Cypriot ships to international waters following a mutual understanding reached with Lebanon.⁶⁰ From April 2024 onwards, following the measures taken to deter arrivals the number of boats fell significantly.⁶¹

In September 2024, Human Rights Watch published an extensive report on pushbacks and pull backs of Syrian refugees in Lebanon and Cyprus, which stated that ‘*Cypriot authorities have collectively expelled hundreds of Syrian asylum seekers without allowing them access to asylum procedures, forcing them onto vessels that traveled directly back to Lebanon. People expelled said that Lebanese army officers handed them directly to Syrian soldiers and unidentified armed men inside Syria.*’⁶² The Deputy Minister of Migration and international Protection responded to HRW Report by stating ‘... accusations that Lebanon and Cyprus are “working in collaboration” to prevent Syrian refugees from reaching Europe and forcibly sending them back to Syria are allegations. [...] Human Rights Watch is a respected NGO of international scope, but what is included in its report is nothing more than allegations. So it is a tradition of some claims, we have repeatedly stated that as the member state that accepts the largest percentage

⁵⁵ UN, *Report of the United Nations Secretary-General on the UN operation in Cyprus*, 8 January 2021, available at: <https://bit.ly/3MrUfYl>.

⁵⁶ Information provided by Cyprus Refugee Council
Further details on pushbacks carried out in 2020 and 2021 are available in previous AIDA Country Reports on Cyprus, available at: <https://bit.ly/4aivBFw>.

⁵⁷ Information provided by Cyprus Refugee Council.

⁵⁸ Associated Press, *Cyprus is sending Syrian migrants back to Lebanon. The UN is concerned but Cypriots say it's lawful*, updated on 11 August 2023, available at: <https://bit.ly/3NldVJT>

⁵⁹ Cyprus Mail, *Five migrant boats pushed back to unknown location*, 17 April 2024, available [here](#).

⁶⁰ Cyprus Mail, *Mutual commitment' reached in Lebanon on migration (Update 2)*, 8 April 2024, available [here](#); Cyprus Mail, *Cyprus ships patrolling off Lebanon to deter migrants*, 16 April 2024, available [here](#).

⁶¹ UNHCR, *Monthly Arrivals Trends in Cyprus 2024*, available [here](#). See also, Pjilenews, *Record decrease in new asylum applications in 2024 (tables)*, 14 December 2024, available in Greek [here](#).

⁶² Human Rights Watch, *Lebanon/Cyprus: Refugees Pulled Back, Expelled, Then Forced Back to Syria*, 4 September 2024, available [here](#).

of asylum applications in proportion to the population, we have taken some legal measures in order to protect the state's ability to meet its international obligations.'⁶³

In October 2024, the European Court of Human Rights, in the case of **M.A. and Z.R. v. Cyprus** found that Cyprus violated the European Convention on Human Rights when it returned to Lebanon two Syrian citizens who wanted to apply for asylum. The case concerns the interception of Syrian nationals at sea by the Cypriot authorities and their immediate return to Lebanon. The ECHR found unanimously, that there had been, on account of the applicants' return to Lebanon, a violation of Article 3 (prohibition of inhuman or degrading treatment) of the Convention, a violation of Article 4 of Protocol No. 4 (prohibition of collective expulsion of aliens), a violation of Article 13 (right to an effective remedy) and, on account of the applicants' treatment by the Cypriot authorities, a violation of Article 3 of the Convention. According to the ECHR, the Cypriot authorities had essentially returned M.A. and Z.R. to Lebanon without processing their asylum claims and without all the steps required under the Refugee Law. It was evident from the Government's submissions that the national authorities had not conducted any assessment of the risk of lack of access to an effective asylum process in Lebanon or the living conditions of asylum-seekers there and had not assessed the risk of refoulement - the forcible return of refugees to a country where they might be subjected to persecution. Nor had they examined the specific situation of the individuals concerned.⁶⁴

In March 2025, UNHCR expressed its concern as three boats with approximately 80 Syrians onboard "were reportedly pushed back by Cypriot authorities, as a result of which the Syrian nationals were forcibly returned to Syria from where they had fled". The UNHCR also repeated its call to states to "refrain from pushbacks and summary returns of individuals without legal and procedural safeguards" and reminded them that any "law enforcement operations" had to be conducted "with the respect of international law, including refugee and human rights law, and should not result in situations incompatible with the prohibition of refoulement".⁶⁵ In response the Cypriot government issued a statement in which it attempted to eliminate some of the "confusion" regarding the recent incidents. "We categorically deny that there were gunshots fired, water sprayed, or any pushbacks conducted, as reported in some media outlets.". The statement also refuted accusations that Cypriot authorities were responsible for human rights violations and said that they had "never ignored a call for help" regarding SAR operations.⁶⁶

Furthermore, in March 2025 a shipwreck happened off the coast of Cyprus that cost the lives of at least seven people. The boat was reportedly carrying 20 persons, mostly Syrian nationals, of which two persons were rescued and seven bodies recovered, sank off Cape Greco. The Joint Rescue Coordination Centre (JRCC) confirmed that a search and rescue (SAR) operation was ongoing.⁶⁷ The official response to the tragedy led to a political row, specifically whether the Cypriot authorities responded in a timely manner to the alert that the boat was in distress, with political parties calling for a "full and independent investigation".⁶⁸

Pushbacks have also taken place at land and specifically at the Green Line with a small number of incidents in 2022, 2023 and 2024, as third country nationals are denied access to territories under the effective control of the Republic and to the asylum procedure when they try to cross from the official checkpoints. In December 2022, the Greek Cypriot police at the Ledra Palace checkpoint denied entry to

⁶³ SigmaLive, *Ioannidis: It is unacceptable to accuse us of human rights violations*, 5 September 2024, available in Greek [here](#).

⁶⁴ ECtHR, *M.A. and Z.R. v. Cyprus* (application no. 39090/20), available [here](#); see also, KISA, *ECHR's condemnation of Cyprus' pushbacks to Lebanon*, 8 October 2024, available [here](#); and CNA, *Cyprus condemned by ECHR for returning asylum seekers to Lebanon*, 8 October 2024, available [here](#).

⁶⁵ UNHCR, 'UNHCR concerned about reports of pushbacks of Syrians', 18 March 2025, available [here](#).

⁶⁶ Philenews, 'Government denies pushing back migrants, as more than 10 believed drowned', 19 March 2025, available [here](#).

⁶⁷ AP, 'Migrant shipwreck off Cyprus' coast leaves 7 dead and 2 survivors, according to state TV', 17 March 2025, available [here](#).

⁶⁸ Philenews, 'Opposition parties demand investigation into Cyprus migrant boat disaster', 18 March 2025, available [here](#).

two Turkish nationals of Kurdish origin seeking to apply for international protection. The two persons remained stranded in the buffer zone without support from the authorities; tents were supplied by UNHCR and food was supplied initially by foreign embassies and UNHCR and subsequently by UNFICYP. One of the persons remained in the buffer zone until September 2023 and was eventually given access to asylum procedures. In November 2023 an asylum seeker from Iran presented herself to the police at the Ledra Palace checkpoint, declaring her need for international protection and was denied access to asylum procedures. She remained stranded in the buffer zone for three days and was allowed entry to the areas not controlled by the RoC and returned to Türkiye.⁶⁹

In May 2024, in an attempt to stem arrivals coming from the areas in the north, a certain number of persons crossing the green line were not permitted to enter the areas under the effective control of the RoC and were forced to remain in the buffer zone.⁷⁰ Furthermore, there were reports of persons entering the areas under the control of the RoC and reaching the First Reception Center, Pournara in an attempt to access asylum procedures and forcefully being returned to the Buffer Zone. From May to November, the number of persons in total trapped in the Buffer Zone were 147, among them children and vulnerable persons with physical and mental health concerns.⁷¹ Furthermore, the majority of persons were from countries with protection needs such as Syria, Afghanistan, Sudan and Palestinians from Gaza. They were living in tents provided by UNHCR in extremely harsh conditions due to high temperatures during the summer months, on land infested with mosquitoes, rats and snakes.⁷² Food, water, clothing and basic facilities were provided through the United Nations Peacekeeping Force in Cyprus (UNFICYP) with UNHCR's support and the RoC offering emergency medical care in the state hospital, but the persons were returned by the police back to the BZ following discharge.⁷³ The option of returning to the areas in the north is challenged by the fact that there is no asylum system and persons would be prosecuted for illegal entry, most possibly leading to prison sentences.⁷⁴

Over the period from May to November 2024, persons remained trapped in the Buffer Zone, whereas in some cases they were permitted to access the areas under the control of the ROC. In October 2024, Council of Europe Commissioner for Human Rights O'Flaherty expressed concern about the situation of migrant and asylum-seeking people stranded in the buffer zone and allegations of summary returns at sea.⁷⁵ Legal action was taken before the International Protection Administrative Court (IPAC) and an application for interim measures was submitted with the European Court of Human Rights (ECHR) under Rule 39.⁷⁶ The ECHR requested the Cypriot government to provide information on whether the asylum seekers had access to asylum procedures in Cyprus and whether they are at risk of indirect refoulement to the Dead Zone.⁷⁷

⁶⁹ Information provided by Cyprus Refugee Council.

⁷⁰ PIO, *Statements by the President of the Republic on the issue of irregular immigrants in the buffer zone*, 14 June 2024, available in Greek [here](#) ; Cypus Government, *Announcement of the Deputy Ministry of Immigration and International Protection on the new arrival of irregular immigrants in the Dead Zone through occupied*, 2 August 2024, available in Greek [here](#); New York Times, *Seeking Safety in Cyprus, They're Stuck in Island's U.N. Buffer Zone*, available [here](#); Info Migrants, *EU Commission urges Cyprus to allow stranded migrants to seek asylum*, 9 August 2024, available [here](#).

⁷¹ Information provided by Cyprus Refugee Council.

⁷² The Guardian, *ECHR ruling for Cyprus asylum seekers may embolden refugees in buffer zone*, 11 October 2024, available [here](#).

⁷³ UNHCR, *UNHCR alarmed about the plight of those trying to access asylum in Cyprus*, 12 June 2024, available [here](#).

⁷⁴ Information provided by Cyprus Refugee Council.

⁷⁵ Council of Europe, *Cyprus: Commissioner O'Flaherty expresses concern about the situation of migrant and asylum-seeking people stranded in the buffer zone and allegations of summary returns at sea*, 23 October 2024, available [here](#).

⁷⁶ The application to the ECHR was made in collaboration with the Cypriot Non-Governmental Organization "Movement for Equality, Support, Anti-Racism" (KISA) and the Italian Non-Governmental Organization "Rule 39 Initiative" and the applicants are represented by lawyers Nicoletta Charalambidou and Daria Sartori.

⁷⁷ Politis, *Strict deadline for Christodoulides government from ECHR after communication game and threats of deportation of asylum seekers* 19 November 2024, available in Greek [here](#).

In November 2024, the last remaining persons were given access to the areas under the control of the RoC.⁷⁸ In an announcement, the Deputy Minister of Migration and International Protection stated that *'All the people who were there have now been transferred temporarily and exceptionally to the reception center in Kofinou, so that the procedures for their transfer to third countries or their deportation can be carried out'*.⁷⁹ The Deputy Minister also stated that these persons had not been given access to asylum procedures and would not be given such access.⁸⁰ In view of the above statement, the ECHR annulled the extension given to the government of the RoC and demanded immediate response to the questions it raised.⁸¹ It was confirmed that all persons had been given access to asylum procedures upon arrival to the areas under the control of the RoC.⁸²

The Council of Europe has systematically raised concerns on the issue of pushbacks. Specifically, in 2021, in a letter addressed to the Minister of Interior of Cyprus, the Council of Europe Commissioner for Human Rights Dunja Mijatović urged the Cypriot authorities to ensure that independent and effective investigations into allegations of pushbacks and of ill-treatment of arriving migrants, including persons who may be in need of international protection, be carried out by members of security forces.⁸³

In October 2024, the current Council of Europe Commissioner for Human Rights, Michael O'Flaherty, expressed concerns regarding the situation of some 35 individuals who have been stranded in the buffer zone for several months. *"Prolonged stays in poor conditions expose them to significant risks of violation of the human rights enshrined in the European Convention on Human Rights (ECHR), including the prohibition of inhuman and degrading treatment and the right to private and family life"*, he said. The Commissioner also expressed concern over reports of boats carrying migrants, including persons who may need international protection, being prevented from disembarking in Cyprus and returned, sometimes violently, without access to asylum procedures. *"These actions could lead to violations of the ECHR and the UN Refugee Convention, which prohibit the return of individuals to countries where they may face human rights abuses,"* the Commissioner added.⁸⁴ The President of the Republic of Cyprus in his response stated *'The Government of the Republic of Cyprus will make every possible effort to prevent the normalization of irregular crossings through the "Green Line", always in accordance with its obligations under international and European law... The commitment of the Government of the Republic of Cyprus to provide adequate international protection to asylum seekers and to comply with the EU acquis is demonstrated by a series of events'*.⁸⁵

Other measures taken in 2024 in an attempt to stem arrivals included the government calling on the European Union to consider declaring parts of Syria safe to repatriate Syrians,⁸⁶ revocation of international protection status of Syrian beneficiaries of international protection who travelled back to Syria in the last year through the northern part of Cyprus and Türkiye,⁸⁷ and the suspension of the examination of asylum

⁷⁸ PhilNews, *Deputy Minister of Migration: Migrants are being moved from the Buffer Zone*, 31 October 2024, available in Greek [here](#).

⁷⁹ Gov CY, *Announcement of the Deputy Ministry of Immigration and International Protection on the issue of irregular migrants in the Dead Zone*, 16 November 2024, available in Greek [here](#).

⁸⁰ Reporter, *In Kofinou, the immigrants who were in the Dead Zone - The Government is not afraid of any appeals to the ECtHR*, 16 November 2024, available in Greek [here](#).

⁸¹ Politis, *Strict deadline for Christodoulides government from ECHR after communication game and threats of deportation of asylum seekers*, 19 November 2024, available in Greek [here](#).

⁸² Information provided by Cyprus Refugee Council.

⁸³ CoE Commissioner for Human Rights, *Cypriot authorities should investigate allegations of pushbacks and ill-treatment of migrants, improve reception conditions, and ensure an enabling environment for NGOs*, 10 March 2021, available at: <https://tinyurl.com/3z2htan3>.

⁸⁴ CoE Commissioner for Human Rights, *Cyprus: Commissioner O'Flaherty expresses concern about the situation of migrant and asylum-seeking people stranded in the buffer zone and allegations of summary returns at sea*, 31 October 2024, available [here](#).

⁸⁵ Kathimerini, *We will prevent the normalization of irregular crossings on the Green Line*, 31 October 2024 available in Greek [here](#).

⁸⁶ Reuters, *Cyprus calls for EU rethink on Syria migration as refugee numbers rise*, 14 December 2023, available at <https://bit.ly/3tC2NHq>

⁸⁷ Cyprus Mail, *Govt seeks to return 30 Syrian nationals 'ASAP'*, 16 April 2024, available [here](#).

applications of Syrian nationals, regardless of the date the application was made, a measure which is still in place as of early 2025.⁸⁸

Furthermore, from April 2024 onwards, Syrian nationals that applied for asylum are not permitted to live in the community and receive financial assistance as part of the MRC. Initially, they were transferred from Pournara to the Reception Center in Kofinou, where they were issued with residence orders. From then on, they were allowed to leave Kofinou and reside in the community however, if they opted to do so, access to material reception conditions is reduced and, specifically, they do not have access to the financial allowance. From late 2024 onwards the option is provided before leaving Pournara to move to Kofinou or live in the community without financial assistance, with the majority opting to waive entitlements to the financial allowance and live in the community. No assessment is carried out with regards to risk of destitution.⁸⁹

Legal access to the territory

Cyprus does not provide the possibility for third country nationals to apply for a (humanitarian) visa, specifically with the intention to apply for international protection upon arrival. Only persons who are able to secure other types of visas (tourist, visitor) may have legal access to the territory (see also [Family Reunification](#)).

Cyprus does not contribute to relocations but is rather a beneficiary of relocations to other Member States. The voluntary relocation programme was agreed in June 2022 with the aim to provide concrete support to frontline countries (MED5) to manage increased flows of asylum applicants. The programme is supported by EU funding, at the request of the concerned Member States, with assistance from the EU Asylum Agency and IOM. More specifically, resettlement activities are 100% financed by the Asylum, Migration and Integration Fund (AMIF). The transfers are carried out with the cooperation of the Asylum Service of the Ministry of the Interior of Cyprus, the European Asylum Service (EUAA), the European Commission and the International Organization for Migration (IOM).⁹⁰ In December 2022, the first relocations of 48 Syrian and Afghan refugees from Cyprus to other Member States took place.⁹¹

In 2023, 1,773 persons were relocated mainly to Germany and France, and to a lesser extent Romania, Bulgaria, Belgium, Finland, Norway, Portugal. Persons relocated are mainly nationals from Syria, Afghanistan and smaller numbers from Iraq, Democratic Republic of the Congo, Cameroon, Somalia, Nigeria, Sierra Leone, Djibouti, Palestine.

The programme continued in 2024, with 852 persons (592 cases) relocated mainly to Germany and France, and to a lesser extent Belgium and Bulgaria. Persons relocated are mainly nationals from Syria, Afghanistan and smaller numbers from Cameroon, DRC, Ethiopia, Guinea, Iran, Iraq, Kenya, Liberia, Nigeria, Sierra Leone and Somalia.⁹²

In view of the rise of asylum applicants from Syria requesting relocation to other EU Member States, upon arrival, in mid-2023 the government decided to exclude all new asylum applicants from the voluntary relocation programme to act as a deterrent to future arrivals. Persons arriving in Cyprus from January

⁸⁸ Phileleftheros, *President: The examination of asylum applications in all cases of persons of Syrian origin is suspended*, 13 April 2024, available in Greek at: <https://bit.ly/4aV5a8m>.

⁸⁹ Philnews, *Suspension of asylum applications affects thousands*, 16 April 2024, available [here](#).

⁹⁰ Cyprus Asylum Service, *Relocation*, available at: <https://tinyurl.com/4xt27tfm>

⁹¹ Kathimerini, *First group of asylum applicants relocated to Germany from Cyprus*, 22 January 2023, available at: <https://bit.ly/3LsEx1c>; Schengen Visa, *First Group of Asylum Applicants Gets Relocated From Cyprus to Germany*, 21 December 2022, available at: <https://bit.ly/3JFJeHh>.

⁹² Information provided by the Asylum Service.

2023 onwards are thus not eligible to the Program.⁹³ However, the majority of asylum applicants are not aware of this limitation and often request to be relocated.⁹⁴

Prior to the current relocation programme there were limited such initiatives. In 2020, approximately 150 vulnerable asylum applicants, including unaccompanied children, were relocated to Finland as part of an initiative created by Finnish authorities to support Cyprus. In December 2021, following a visit by Pope Francis to Cyprus, 50 persons were relocated to Italy.⁹⁵

2. Preliminary checks of third country nationals upon arrival

Indicators: Preliminary checks at the arrival point

1. Are there any checks that are applied systematically or regularly at the point of entry when a person enters the territory? ☐ Yes ☐ No
2. Is the person considered under law to have entered the territory during these checks? ☐ Yes ☐ No

Persons that enter irregularly are transferred to the First Reception Center, Pournara and are subject to checks in the Center. Third country nationals that enter regularly are subject to visa and identity checks upon arrival at the airport and may be requested to show sufficient funds and a place of stay. If there is any reason to doubt the information provided, entry may be refused and the person will be detained in the airport holding facilities until a return flight is arranged (see section: [Place of Detention](#)). A decision refusing entry is issued.⁹⁶

3. Registration of the asylum application

Indicators: Registration

1. Are specific time limits laid down in law for making an application? ☐ Yes ☒ No
❖ If so, what is the time limit for lodging an application?
2. Are specific time limits laid down in law for lodging an application? ☒ Yes ☐ No
❖ If so, what is the time limit for lodging an application? 6 working days
3. Are registration and lodging distinct stages in the law or in practice?⁹⁷ ☒ Yes ☐ No
4. Is the authority with which the application is lodged also the authority responsible for its examination? ☐ Yes ☒ No
5. Can an application be lodged at embassies, consulates or other external representations? ☐ Yes ☒ No

3.1. Making and registering an application

An asylum application can only be lodged within the territory and specifically in the areas under the effective control of the RoC. There is no possibility to lodge an asylum application at embassies, consulates or other external representation of the country or in the areas in the north that are not under the effective control of the RoC.

⁹³ InfoMigrants, *Cyprus excludes new asylum applicants from resettlement scheme*, 20 July 2023, available at: <https://bit.ly/3H26qJK>.

⁹⁴ Information provided by Cyprus Refugee Council.

⁹⁵ European Migration Network, *Flash: 37th edition*, May 2022, available at: <https://bit.ly/3MconJv>, 6.

⁹⁶ Information provided by Cyprus Refugee Council.

⁹⁷ Registration and lodging are distinct stages in law but not in practice.

According to the Refugee Law,⁹⁸ an asylum application is addressed to the Asylum Service, a department of the Ministry of Interior. However, the Aliens and Immigration Unit (AIU), an office within the police, is primarily responsible for receiving and registering applications for international protection on behalf of the Asylum Service (including fingerprinting for EURODAC and Dublin purposes). The AIU is also responsible for implementing detention and deportation orders issued by the Director of the CRMD. The Cypriot police is also responsible for facilitating and maintaining migration related IT-systems, such as the Eurodac and DubliNet NAP.⁹⁹

The Law states that the AIU has three working days after the application is made to register it and must then refer it immediately to the Asylum Service for examination. In cases where the applicant is in prison or immigration detention, the application is made at the place of imprisonment or detention.¹⁰⁰ If the application is made to authorities who may receive such applications but are not competent to register them, that authority shall ensure that the application is registered no later than six working days after the application is made.¹⁰¹ Furthermore, if a large number of simultaneous requests from third country nationals or stateless persons makes it very difficult in practice to meet the deadline for the registration of the application, these requests are registered no later than 10 working days after their submission.¹⁰²

The Refugee law does not specify the time limit within which asylum applicants should make their application for asylum; it only specifies a time limit between making and lodging an application.¹⁰³ Furthermore, according to the Law,¹⁰⁴ applicants who have entered irregularly are not subjected to punishment solely due to their illegal entry or stay, as long as they present themselves to the authorities without undue delay and provide the reasons of illegal entry or stay. In practice, the majority of persons entering or staying in the country irregularly will not be arrested when they present themselves to apply for asylum unless there is an outstanding arrest warrant or if they were in the country before and there is a re-entry ban. In limited cases, persons may be arrested when they present themselves to apply due to their irregular entry or stay even if there is no arrest warrant or re-entry ban (see [Access to the Territory](#)).¹⁰⁵

According to the Refugee Law,¹⁰⁶ if an asylum applicant did not make an application for international protection as soon as possible, and without having a good reason for the delay, the [Accelerated Procedure](#) can be applied, however in practice there are no indications that this is utilised for applicants that are not from a 'safe country'.¹⁰⁷ The fact that an asylum application was not made at the soonest possible time by an asylum applicant who entered legally or irregularly will often be taken into consideration during the substantial examination of the asylum application and as an indication of the applicant's lack of credibility and/or intention to delay removal.¹⁰⁸

In practice, since 2019 and the establishment of **Pournara**, the First Reception Centre in **Kokkinotrimithia** (see [Types of Accommodation](#)), all persons who arrive in the areas under the effective control of the RoC in an irregular manner are referred to the Centre for registration. Persons who have arrived in a regular manner, as well as persons already residing in the country on other statuses or who are undocumented, make and lodge asylum applications at the AIU, an office within the Police of the city they are residing in and will not be referred to Pournara. There are AIU offices in each of the 5 districts in Cyprus (**Nicosia, Limassol, Larnaca, Paphos, Ammochostos**). Furthermore, from 2022 until present, persons who are already residing in the country are at times referred to Pournara to make and lodge an asylum application but are not obliged to remain there afterwards.

⁹⁸ Article 11(1) Refugee Law.

⁹⁹ EASO, *Operating Plan, Cyprus 2022-2024*, available at: <https://bit.ly/3VZPs7P>.

¹⁰⁰ Article 11(2)(a) Refugee Law.

¹⁰¹ Article 11(2)(b) Refugee Law.

¹⁰² Article 11(2)(c) Refugee Law.

¹⁰³ Article 11(4)(a) Refugee Law.

¹⁰⁴ Article 7 Refugee Law.

¹⁰⁵ Information provided by the Cyprus Refugee Council based on monitoring visits to the detention centre.

¹⁰⁶ Article 12Δ(4)(i) Refugee Law.

¹⁰⁷ Information provided by the Cyprus Refugee Council.

¹⁰⁸ Ibid.

The services provided at the First Reception Centre in **Pournara** include identification, registration, and lodging of asylum applications, as well as medical screening and vulnerability assessments; when possible, the full assessment of the asylum application is directly carried out at the Asylum Examination Centre adjacent to the '**Pournara**' First Reception Centre. The duration of stay in the Centre is officially 72 hours, however this has never been the case, and the duration has fluctuated over various periods from 2 weeks to several months.¹⁰⁹ During 2022 the average duration of stay was 40-60 days however there are always cases that remain longer. Furthermore, the duration of stay for UASC was significantly longer and in 2022 on average 3 months. In 2023, the average duration of stay was 30-40 days for adults and 80 days for UASC. In 2024, the duration of stay was similar to 2023, however there was a significant number of cases where the duration of stay for adults and families reached 3 months and for UASC 4 months.¹¹⁰ As in 2023, delays in exiting continued in 2024 for persons and families with vulnerabilities, as well as large families due to the obstacles in securing housing.

For persons held in the **Menogia** immigration detention centre, asylum applications are received directly within the detention facilities. For persons detained in holding cells in police stations and prison, when they request to lodge an asylum application, the AIU is notified and sends a police officer of the AIU to receive the application. Access to asylum from prison improved in 2022, whereas in cases of people detained in holding cells significant delays were still registered.¹¹¹ In 2023 and in 2024, access to asylum from prison was mostly without issue. However, access to asylum while in police holding cells still varied depending on the police stations.

During 2020 and 2021 access to **Pournara** to register asylum applications was problematic.¹¹² In early 2022, it was reported that every day on average 40-50 persons were not admitted for registration, and were forced to keep returning every morning until given access.¹¹³ In late 2022, the situation remained the same and, due to the high number of arrivals, it was decided to admit a maximum of 60 persons per day to keep the numbers of persons in the Centre under control. As a result, approximately 40 persons were denied admission each day, leading to some persons entering the Centre irregularly in order to find shelter and others sleeping outdoors in front of the registration gate in the hopes of securing a position in the queue the following day. Several makeshift tents and shelters appear at times around the centre, mostly inhabited by persons awaiting registration. Persons with a passport or some form of identification document are systematically given access faster.

In 2023, the number of arrivals decreased which led to a significant improvement in access to the Centre, with most persons having access upon arrival. However, there were still instances where persons who did not present passports were denied entry by the AIU for 2-3 days.¹¹⁴ In 2024, overall, there were no issues related to access to the Center and registration, including for persons without passports. However, from May to November 2024, there were instances of persons reaching the Center and requesting access to asylum procedures who were taken by the AIU to the Buffer Zone (see section: [Access to Territory](#)).

Registrations carried out by the EUAA in Cyprus continued to decrease, with 6,295 registrations in 2024. 95% related to the top 10 citizenships of applicants, mainly from Syria (4,105), Afghanistan (414), Iran

¹⁰⁹ Ibid.

¹¹⁰ Commissioner for Administration and Protection of Human Rights (Ombudsman), *Report on the visit on February 21, 2025 to the "Pournara" Temporary Reception and Hospitality Center for migrants Immigrants in Kokkinotrimithia*, ΕΜΠ. 8 January 2025, available [here](#).
Kathimerini, *In Pournara, 27 unaccompanied minors for over 90 days*, 25 February 2025, available in Greek [here](#).

¹¹¹ Ibid.

¹¹² For detailed information, see the 2021 and 2022 Updates of the AIDA Country Report on Cyprus, available at: <https://bit.ly/4aivBFw>.

¹¹³ Information provided by Cyprus Refugee Council.

¹¹⁴ Ibid.

(351) and Somalia (333).¹¹⁵ In 2024, the EUAA carried out 2,799 registrations for temporary protection in Cyprus,¹¹⁶ less than half as many as in 2023.¹¹⁷

3.2. Lodging an application

According to the law, the applicant must lodge the application within six working days from the date the application was “made”, at the place that it was made, provided that it is possible to do so within that period.¹¹⁸ If an application is not lodged within this time, the applicant is considered to have implicitly withdrawn or abandoned their application.¹¹⁹ Lastly, within three days from lodging the application, a confirmation that an application has been made must be provided.¹²⁰ In practice an application is made and lodged at the same time and a confirmation that the application has been made is issued. Therefore, there are rarely, if any, applications that will be considered to have been implicitly withdrawn or abandoned at this stage.

Fingerprints, according to the law, should be taken when an application is made.¹²¹ However, in practice fingerprints are usually taken by the AIU when an application is lodged. Fingerprints are taken for applicants and all dependants aged 14 and over.

When lodging the application, the applicant is provided with an A4 paper form entitled “Confirmation of Submission of an Application for International Protection”. This document includes a photograph in addition to personal details. The application is also registered in the common asylum database, managed by the Asylum Service.

For applicants registering at **Pournara** Centre, all procedures are completed in the Centre, including identification, registration, and lodging of asylum applications as well as medical screenings, vulnerability assessments, and the issuance of the ARC number. The “Alien’s Registration Certificate” (ARC) is a 1-page document containing a registration number. This is also referred to as the “Alien’s Book”. Full access to reception conditions are subject to the issuance of an ARC number (see [Criteria and restrictions to access reception conditions](#)).

If the applicant applied at the AIU, they proceed with medical examinations at a public hospital. Upon receiving the results or at a given appointment, they are expected to return to the AIU and submit their medical results. The AIU will register the applicant in the aliens’ register and upon submitting their medical results they will receive an ARC. All results from the medical examinations are included in the applicants’ file maintained by the Asylum Service. The findings of the medical examinations may lead to referrals to State doctors, especially for urgent or transmittable conditions, however it hardly ever leads to alternative accommodation.¹²²

¹¹⁵ Information provided by the EUAA, 14 March 2025.

¹¹⁶ Information provided by the EUAA, 14 March 2025.

¹¹⁷ Information provided by the EUAA, 26 February 2024.

¹¹⁸ Article 11(4)(a) Refugee Law.

¹¹⁹ Article 11(4)(c) Refugee Law.

¹²⁰ Article 8(1)(b) Refugee Law.

¹²¹ Article 11A Refugee Law.

¹²² Information provided by Cyprus Refugee Council.

C. Procedures

1. Regular procedure

1.1. General (scope, time limits)

Indicators: Regular Procedure: General

- | | |
|--|---|
| 1. Time limit set in law for the determining authority to make a decision on the asylum application at first instance: | 6 months |
| 2. Are detailed reasons for the rejection at first instance of an asylum application shared with the applicant in writing? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Backlog of pending cases at first instance as of 31 December 2024: | 17,244 |
| 4. Average length of the first instance procedure in 2024: | 18-24 months |

According to the law, the Asylum Service shall ensure that the examination procedure is concluded as soon as possible, without prejudice to an adequate and complete examination.¹²³ Furthermore, the Asylum Service shall ensure that the examination procedure is concluded within 6 months of the lodging of the application.¹²⁴ In instances where the Asylum Service is not able to issue a decision within six months, it is obliged to inform the applicant of the delay and, upon request of the applicant, provide information on the reasons for the delay and on the time-frame in which a decision on the application is expected.¹²⁵

The six month time-frame can be extended for a period not exceeding a further nine months, where: (a) complex issues of fact and/or law are involved; (b) a large number of third-country nationals or stateless persons simultaneously apply for international protection, making it very difficult in practice to conclude the procedure within the six-month time limit; (c) where the delay can clearly be attributed to the failure of the applicant to comply with their obligations as provided for under the law.¹²⁶ By way of exception, the Asylum Service may, in duly justified circumstances, exceed the time limits laid down by a maximum of three months where necessary in order to ensure an adequate and complete examination of the application.¹²⁷

The Head of the Asylum Service may postpone concluding the examination procedure where the Asylum Service cannot reasonably be expected to decide within the time limits laid down, due to an uncertain situation in the country of origin which is expected to be temporary. In such a case, the Asylum Service shall conduct reviews of the situation in that country of origin at least every six months; inform the applicants concerned within a reasonable time of the reasons for the postponement; and inform the European Commission within a reasonable time of the postponement of procedures for that country of origin.¹²⁸ Finally, the law states that in any event, the Asylum Service shall conclude the examination procedure within a maximum time limit of 21 months from the lodging of the application.¹²⁹

In practice, the time required for the majority of decisions on asylum applications exceeds the six-month period, and in cases of well-founded applications, the average time taken for the issuance of a decision

¹²³ Article 13(5) Refugee Law.

¹²⁴ Article 13(6)(a) Refugee Law.

¹²⁵ Article 13(6)(b) Refugee Law.

¹²⁶ Article 13(7) and Article 16 Refugee Law.

¹²⁷ Article 13(8) Refugee Law.

¹²⁸ Article 13(9) Refugee Law.

¹²⁹ Article 13(10) Refugee Law.

is approximately two years.¹³⁰ It is not uncommon for well-founded cases to take up to three or four years before asylum applicants receive a first instance decision. With the increase in examiners there has been an improvement in the time required to process cases. However, in view of the large backlog, the waiting time remains long for many cases.¹³¹

Decisions are based on a recommendation issued either by Asylum Service caseworkers or EUAA caseworkers. Present in Cyprus since 2014, the EUAA (then EASO) has been providing technical support to the Asylum Service since 2017 in an effort to address the backlog and speed up the examination of asylum applications. From 2020 onwards, the Ministry of Interior has also introduced measures specifically targeted at reducing the backlog and examination times of asylum applications, mainly by increasing the examiners. The result of these actions is evident from 2021 onwards as there has been a significant increase in the number of decisions issued. Specifically, in 2020, 4,637 decisions were issued; in 2021, 14,868 decisions; in 2022 15,193 decisions; in 2023, 18,321 decisions and in 2024 17,244 decisions.

Delays in issuing decisions do not lead to any consequences and the Asylum Service does not inform the asylum applicant of the delay as provided for in the law unless the applicant specifically requests information on the delay. Even when such a request is submitted to the Asylum Service, the written response briefly mentions that the decision will be issued within a reasonable time, yet no specific time frame or reasons for the delay are provided to the applicant. In 2021 and 2022, the Cyprus Refugee Council challenged, before the IPAC, the delays in issuing decisions on asylum applications in two cases. During the Court proceedings, the Asylum Service proceeded to issue decisions granting international protection in both cases, which led to the cases having to be withdrawn and the Court not issuing a decision on the issue of delays.

Overall, the backlog of pending cases had consistently increased from 2017 onwards, doubling from 2018 to 2019 and reaching 19,660 cases at the end of 2020. In addition, with the closure of the Refugee Reviewing Authority, approximately 400 cases were transferred back to the Asylum Service and onto the backlog: at the end of 2023, 89 of those cases were still pending.¹³² In 2021, for the first time in recent years, the backlog was slightly reduced, counting 16,994 pending cases at first instance, which concerned 18,805 persons. However, in 2022 it increased sharply to 29,715 applicants due, partly, to the increase in asylum applications but also because of the practice to not examine asylum applications from Syrian nationals from February onwards with very few exceptions.¹³³ In 2023, the number of asylum applications decreased significantly to half in comparison to 2022, however at year end the backlog remained high at 26,599 applicants.¹³⁴

In 2024, the backlog was reduced to 17,244 cases concerning 20,576 applicants, 13,793 of which were Syrian nationals due to the measure initiated in April 2024 to suspend the examination of cases of Syrian nationals.¹³⁵

Backlog of pending cases: 2018-2024						
2018	2019	2020	2021	2022	2023	2024
8,545	17,171	19,660	16,994	29,715	26,599	17,244

Regarding the quality of the decision, the absence of a formal quality assurance unit established at the Asylum Service, as well as the absence of Standard Operating Procedures, guidelines and mechanisms for internal quality control, contribute to diverse approaches in the examination of cases. Such differences

¹³⁰ See, UNHCR, *Thematic Fact Sheet on Reception in Cyprus with updates through December 2024*, available [here](#).

¹³¹ Information provided by the Cyprus Refugee Council.

¹³² Information provided by Cyprus Asylum Service.

¹³³ Based on statistics issued by the Cyprus Asylum Service.

¹³⁴ Information provided by Cyprus Asylum Service.

¹³⁵ Information provided by Cyprus Asylum Service.

are noted between examiners of the same agency (Asylum Service and EUAA), but also in the approach followed by the Asylum Service in comparison to the approach followed by the EUAA. Examples of cases where a diverse approach has been noted include cases with torture claims, LGBTIQ claims, and cases of Palestinians and the application of article 1d of the Geneva Convention.¹³⁶ Furthermore, interviews often differ with regards to the structure and the collection of data.¹³⁷ The CyRC often identifies cases where issues such as gender-based violence, torture, human trafficking, exploitation, and trauma are not detected or not considered, or if they are considered there is often a divergence as to how they are assessed.¹³⁸

Specifically, in LGBTIQ+ cases, it was noted that, although the examiners applied the Difference, Stigma, Shame, and Harm (DSSH) model,¹³⁹ they did so in a problematic way. For example, using closed questions whereas the DSSH model is supposed to operate as a set of conversation 'triggers' to enable a detailed narrative.¹⁴⁰ In a judgment issued by the IPAC in 2024, reservations were expressed about the use of the Difference-Shame-Stigma-Harm (DSSH) model, where the judge stated 'that the DSSH model, while offering a structured approach, can limit understanding of the complexity of applicants' experiences if it is not applied with sensitivity to cultural differences and the unique experiences of each individual. This is because it implicitly imposes a fixed pattern that everyone, regardless of culture or knowledge of sexual orientation concepts, will experience in the development of their sexual identity'.¹⁴¹ Furthermore, there seems to be a lack of understanding regarding specific issues that might affect LGBTIQ+ persons outside of Europe. As a result, applicants were found to be non-credible including in cases where they were in the process of contracting a civil partnership with their partner or had arrived in the country with their partner who was granted refugee status.¹⁴²

1.2. Prioritised examination and fast-track processing

The Refugee Law includes a specific provision for the prioritised examination of applications, within the regular procedure, applicable where:¹⁴³

- ❖ the application is likely to be well-founded;
- ❖ the applicant is vulnerable,¹⁴⁴ or in need of special procedural guarantees, in particular unaccompanied minors.

Although efforts are made to ensure prioritisation is given especially to cases concerning vulnerable persons such as to victims of torture, violence or trafficking, this is not always possible due to the high number of cases pending. Furthermore, other important safeguards are not always followed, such as the evaluation of vulnerability and psychological condition and how this may affect their capability to respond to the questions of the interview (see section on [Special Procedural Guarantees](#)). In addition, these cases may start out as prioritised but there are often delays due to the heavy workload of examiners handling vulnerable cases, the lack of interpreters, or requirements for other examinations to be concluded before a decision can be made, such as examinations of victims of torture by the Medical Board or of victims of trafficking by the Anti-Trafficking Department of the Police.¹⁴⁵

¹³⁶ Information provided from cases represented by Cyprus Refugee Council.

¹³⁷ Based on review of cases between 2006-2018 by the Cyprus Refugee Council and previously the Humanitarian Affairs Unit of the Future Worlds Centre.

¹³⁸ Information provided by Cyprus Refugee Council.

¹³⁹ The DSSH model 2 was created in 2011 by United Kingdom barrister S. Chelvan. This model is referred to by the UNHCR in its *Guidelines on international protection no 9*. EASO has applied DSSH to its training materials since 2015 for claims based on sexual orientation and gender identity.

¹⁴⁰ Assessing the Refugee Claims of LGBTI People: Is the DSSH Model Useful for Determining Claims by Women for Asylum Based on Sexual Orientation? Jasmine Dawson* and Paula Gerber*, *International Journal of Refugee Law*, 2017, Vol 29, No 2, pp. 292-322.

¹⁴¹ IPAC, Case no. 1243/2022, C.F.N.S v. Asylum Service, Decision issued 25 September 2024, available in Greek [here](#).

¹⁴² Based on cases represented by the Cyprus Refugee Council.

¹⁴³ Article 12E Refugee Law.

¹⁴⁴ Within the meaning of Article 9KΔ Refugee Law.

¹⁴⁵ Information provided by Cyprus Refugee Council.

There have been concerted efforts with the EUAA to ameliorate and shorten the examination of claims by vulnerable persons, through screening of applications, dedicated case workers, additional personnel. However, the duration of examination in many cases remains long and exceeds 12 months (see section on [Special Procedural Guarantees](#)).

Based on the vulnerability assessments carried out in Pournara (see section on [Guarantees for vulnerable groups](#)) in 2022, 2,800 persons were identified as vulnerable during the registration of their asylum application. In 2023, 2,706 persons were identified. In 2024, 2,309 persons were identified¹⁴⁶

In addition to the instances of prioritisation mentioned in the Refugee Law, the Asylum Service prioritises certain caseloads and examines them within the regular procedure and not the accelerated procedure, under two circumstances:

- ❖ When the country of origin is deemed generally safe;¹⁴⁷
- ❖ If a conflict is taking place in the country of origin, such as for Iraqi nationals in the past and Syrian nationals until the end of 2021.

In 2020, attempts were made to speed up the examination of cases of **Syrians**. Such efforts continued in 2021, however due to the rise in asylum applications, the timeframe to examine cases of Syrian nationals and Palestinians ex Syria increased to 18-24 months if not longer.¹⁴⁸ In early 2022 and continuing until mid-2023 the Ministry of Interior put on hold the examination of applications from Syrian nationals and Palestinians ex Syria, even though the Ministry of Interior at the time acknowledged that Syria is not considered a safe country and that returns to Syria cannot be made.¹⁴⁹ Indicatively 1,939 decisions were issued in 2021 for Syrian nationals, compared to only 267 decisions in 2022 and 54 decisions from January to June 2023.¹⁵⁰ In response to a request made by the Cyprus Refugee Council the Ministry had attributed the low number of decisions to the backlog.¹⁵¹ From July 2023 onwards examination resumed and by the end of the year 1,651 decisions were issued concerning 2,083 persons.¹⁵²

In April 2024, due to the increase in arrivals of Syrian nationals, the government announced that the examination of asylum applications of Syrian nationals is suspended.¹⁵³ From April 2024, onwards and still to date, the examination of asylum applications of Syrian nationals remains suspended with only a very low number of applications examined concerning vulnerable persons.

¹⁴⁶ Cyprus Asylum Service.

¹⁴⁷ Note that this is also a ground for using the accelerated procedure.

¹⁴⁸ Information provided by the Cyprus Refugee Council.

¹⁴⁹ Announcement of the Ministry of Interior, 31 March 2022, available in Greek at <https://bit.ly/3Jkvr3Q>

¹⁵⁰ Based on official statistics issued by the Cyprus Asylum Service.

¹⁵¹ Information provided by the Cyprus Refugee Council.

¹⁵² Based on official statistics issued by the Cyprus Asylum Service.

¹⁵³ Phileleftheros, *President: The examination of asylum applications in all cases of persons of Syrian origin is suspended*, 13 April 2024, available in Greek at: <https://bit.ly/4aV5a8m>.

1.3. Personal Interview

Indicators: Regular Procedure: Personal Interview

1. Is a personal interview of the asylum applicant in most cases conducted in practice in the regular procedure? ☒ Yes ☐ No
 - ❖ If so, are interpreters available in practice, for interviews? ☒ Yes ☐ No
2. In the regular procedure, is the interview conducted by the authority responsible for taking the decision? ☒ Yes ☐ No
3. Are interviews conducted through video conferencing? ☐ Frequently ☐ Rarely ☒ Never
4. Can the asylum applicant request the interviewer and the interpreter to be of a specific gender? ☒ Yes ☐ No
 - ❖ If so, is this applied in practice, for interviews? ☒ Yes ☐ No

According to the law, all applicants, including each dependent adult, are granted the opportunity of a personal interview.¹⁵⁴ The personal interview on the substance of the application may be omitted in cases where:¹⁵⁵

- ❖ The Head of the Asylum Service is able to take a positive decision with regard to refugee status on the basis of already available evidence; or
- ❖ the Asylum Service is of the opinion that the applicant is unfit or unable to be interviewed owing to enduring circumstances beyond their control. When in doubt, the Asylum Service shall consult a medical professional to establish whether the condition that makes the applicant unfit or unable to be interviewed is of a temporary or enduring nature.

In practice, all asylum applicants are interviewed, and all adult family members receive a separate interview. The waiting time for the interview has always been lengthy, with a significant number of cases reaching 18-24 months after the lodging of the application, which continued in 2024. From 2020 onwards, attempts were made to interview newly arrived asylum applicants residing in Pournara during their stay in the Centre by using the adjacent Asylum Examination Centre. In such cases, the interview takes place soon after the lodging of the asylum application and often close to the vulnerability assessment, with no access to legal advice. Furthermore, from 2022 onwards attempts have been made to prioritise cases of nationals from countries included in the safe list (see section on [Accelerated Procedures](#)).¹⁵⁶

According to the law where simultaneous applications by a large number of third-country nationals or stateless persons make it impossible in practice for the determining authority to conduct timely interviews on the substance of each application by the Asylum Service, the Refugee Law allows the Ministerial Council to issue an order, published in the Gazette, providing that experts of another Member State who have been appointed by the EUAA or other related organisations are to be temporarily involved in conducting such interviews.¹⁵⁷ In such cases, the concerned personnel shall, in advance, receive the relevant training and shall have acquired general knowledge of problems which could adversely affect an applicant's ability to be interviewed, such as indications that the applicant may have been tortured in the past.

¹⁵⁴ Article 13A(1) Refugee Law.

¹⁵⁵ Article 13A(2) Refugee Law.

¹⁵⁶ Information provided by the Cyprus Refugee Council.

¹⁵⁷ Article 13A(1A) Refugee Law.

This provision was triggered in 2017, enabling then EASO experts to conduct in-merit interviews between May 2017 and January 2018.¹⁵⁸ EASO presence has continued ever since.¹⁵⁹ The presence of EASO examiners initially sped up the examination of applications but due to the increasing number of applications it had not impacted the backlog significantly (see [Regular Procedure: General](#)). In 2020, the IPAC identified a time period where there was no Ministerial Decree in force authorising EASO to conduct interviews in the asylum procedures. As a result, the Court determined that all such decisions must be cancelled and re-examined. This resulted in the Asylum Service cancelling all negative decisions and informing asylum applicants that their applications would be re-examined and their status as asylum applicants had been reinstated. Positive decisions were not cancelled.¹⁶⁰

Interviews are carried out at the following locations: the offices of the Asylum Service (two locations), the offices of the EUAA, the Asylum Examination Centre adjacent to 'Pournara' Centre, Kofinou Reception Centre, at AIU offices and, in cases of immigration detainees, at the Menogia Detention Center and at times in the Central Prison for cases of asylum applicants serving prison sentences.¹⁶¹ Regardless of the location of the interview, all interviews are carried out by Asylum Service officers, temporary agency workers or EUAA experts.

In 2024, the EUAA carried out interviews for 1,692 applicants, of which 98% related to the top 10 citizenships of applicants interviewed by the EUAA, mainly applicants from Democratic Republic of Congo (642), Cameroon (345), Iran (180), Nigeria (162), Iraq (110) and Palestine (102).¹⁶²

In 2024, the EUAA drafted 1,751 concluding remarks, of which 94% related to the top 10 citizenships of applicants in concluding remarks drafted by the EUAA, mainly concerning applicants from Democratic Republic of Congo (567), Cameroon (518), Nigeria (204) and Palestine (112).¹⁶³

1.3.1. Quality of interview

According to the law,¹⁶⁴ the Asylum Service shall take appropriate measures to ensure that personal interviews are conducted under conditions that allow the applicant to explain, in detail, the reasons for submitting the application for asylum. In order to do so, the Asylum Service shall:

- (a) Ensure the competent officer who conducts the interview is sufficiently competent to take account of the personal or general circumstances surrounding the application, including the applicant's cultural origin, gender, sexual orientation, gender identity, or vulnerability;
- (b) Wherever possible, provide for the interview with the applicant to be conducted by a person of the same sex if the applicant so requests, unless the Asylum Service has reason to believe that such a request is based on grounds which are not related to difficulties on the part of the applicant to present the grounds of their application in a comprehensive manner;
- (c) Select an interpreter who is able to ensure appropriate communication between the applicant and the competent officer who conducts the interview. The communication shall take place in the language preferred by the applicant unless there is another language which they understand and in which they are able to communicate clearly. Wherever possible, an interpreter of the same sex is provided if the applicant so requests, unless the Asylum Service has reasons to believe that such a request is based on grounds which are not related to difficulties on the part of the applicant to present the grounds of their application in a comprehensive manner;

¹⁵⁸ Ministerial Decree 187/2017 of 9 June 2017 pursuant to Article 13A(1A) of the Refugee Law, available in Greek at: <http://bit.ly/2G5dSDs>.

¹⁵⁹ Ministerial Decree 297/2019 of 13 September 2019 pursuant to Article 13A(1A) of the Refugee Law, available in Greek at <http://bit.ly/3c9bpb7>.

¹⁶⁰ Information provided by Cyprus Refugee Council.

¹⁶¹ The majority of asylum applicants sentenced to prison sentences have committed immigration-related offences such as irregular entry/stay or have attempted to travel to other EU member states on forged travel documents or travel documents belonging to other persons.

¹⁶² Information provided by the EUAA, 14 March 2025.

¹⁶³ Information provided by the EUAA, 14 March 2025.

¹⁶⁴ Article 13A(9) Refugee Law.

- (d) Ensure that the person who conducts the interview on the substance of an application for international protection does not wear a military or law enforcement uniform;
- (e) Ensure that interviews with minors are conducted in a child-appropriate manner.

Furthermore, when conducting a personal interview, the Asylum Service shall ensure that the applicant is given an adequate opportunity to present elements needed to substantiate the application in accordance with the law as completely as possible.¹⁶⁵ This shall include the opportunity to give an explanation regarding elements which may be missing and/or any inconsistencies or contradictions in the applicant's statements.¹⁶⁶

All interviewers (Cyprus Asylum Service and EUAA) are required to undertake the three core EUAA modules: (i) evidence assessment; (ii) interviewing methods; and (iii) inclusion.¹⁶⁷ For CAS caseworkers, there are additional mandatory trainings, including on trafficking and SGBV, and the majority of caseworkers have also undergone the Sexual Orientation and Gender Identity (SOGI) training. Caseworkers assigned to interview cases of vulnerable persons have also undergone EUAA training on interviewing vulnerable persons, claims related to on sexual orientation and gender identity and on interviewing children.¹⁶⁸

Although the implementation of the EUAA trainings has improved the quality of interviews in recent years, the absence of Standard Operating Procedures, guidelines and mechanisms for internal quality control contribute to diverse approaches in the examination of cases. Such differences are noted between examiners of the same agency (Asylum Service and EUAA), but also in the approach followed by the Asylum Service in comparison to the approach followed by the EUAA. Examples of cases where a diverse approach has been noted include cases with torture claims, LGBTIQ claims, and cases of Palestinians and the application of article 1d of the Geneva Convention.¹⁶⁹ Furthermore, interviews often differ with regards to the structure and the collection of data.¹⁷⁰ CyRC has often identified where issues such as gender-based violence, torture, human trafficking, exploitation, and trauma are not detected or not considered, and if they are considered there is often a divergence on how they are assessed.¹⁷¹

Specifically, in LGBTIQ+ cases, it was noted that, although the examiners applied the Difference, Stigma, Shame, and Harm (DSSH) model,¹⁷² they did so in a problematic way. For example, using closed questions whereas the DSSH model is supposed to operate as a set of conversation 'triggers' to enable a detailed narrative.¹⁷³ Furthermore, there seems to be a lack of understanding regarding specific issues that might affect LGBTIQ+ persons outside of Europe. As a result, applicants were found to be non-credible including in cases where they were in the process of contracting a civil partnership with their partner or had arrived in the country with their partner who was granted refugee status.¹⁷⁴ In a judgment issued by the IPAC in 2024, reservations were expressed about the use of the Difference-Shame-Stigma-Harm (DSSH) model, where the Judge stated 'that the DSSH model, while offering a structured approach, can limit understanding of the complexity of applicants' experiences if it is not applied with sensitivity to cultural differences and the unique experiences of each individual. This is because it implicitly imposes a

¹⁶⁵ Article 16(2)(a) and Article 18(3)-(5) Refugee Law.

¹⁶⁶ Article 13A(10) Refugee Law.

¹⁶⁷ EUAA, *Introduction – European Asylum Curriculum*, available at: <https://tinyurl.com/282jhp49>

¹⁶⁸ Information provided by the Cyprus Refugee Council.

¹⁶⁹ Information provided from cases represented by Cyprus Refugee Council.

¹⁷⁰ Based on review of cases between 2006-2018 by the Cyprus Refugee Council and previously the Humanitarian Affairs Unit of the Future Worlds Centre.

¹⁷¹ Information provided by Cyprus Refugee Council.

¹⁷² The DSSH model 2 was created in 2011 by United Kingdom barrister S. Chelvan. This model is referred to by the UNHCR in its *Guidelines on international protection no 9*. EASO has applied DSSH to its training materials since 2015 for claims based on sexual orientation and gender identity.

¹⁷³ Assessing the Refugee Claims of LGBTI People: Is the DSSH Model Useful for Determining Claims by Women for Asylum Based on Sexual Orientation? Jasmine Dawson* and Paula Gerber*, *International Journal of Refugee Law*, 2017, Vol 29, No 2, pp. 292-322.

¹⁷⁴ Based on cases represented by the Cyprus Refugee Council.

fixed pattern that everyone, regardless of culture or knowledge of sexual orientation concepts, will experience in the development of their sexual identity'.¹⁷⁵

The Law provides that the examiner¹⁷⁶ and the interpreter¹⁷⁷ can be of the same gender as the applicant, if they make such a request. In practice, if such a request is made (same gender or opposite gender) it is usually granted. However, due to the absence of information and legal advice or representation (see [Regular Procedure: Legal Assistance](#)), most applicants are unaware of their right to make such request.

Children may be present in the interview room with their parents, especially children of young ages who cannot remain in the reception area by themselves. Examiners often encourage parents to arrange childcare, however this is not provided by the Cyprus Asylum Service and single parents especially often do not have such options. The presence of children is problematic as they may hear disturbing details or witness their parent in distress. Furthermore, their presence can be distracting for the parent and disruptive for the interview process. For unaccompanied minors, see [Legal representation of unaccompanied children](#).

1.3.2. Interpretation

Caseworkers of the Asylum Service or the EUAA often conduct interviews in English, even if Greek is their mother tongue, and use interpretation where needed. This is because it is easier to identify interpreters that can speak the applicant's language and English rather than Greek. However, this often affects the quality of interviews where the caseworker would arguably be more comfortable using Greek instead of English. The language barrier is often visible in the interview transcript and recommendation, which often have several grammar, spelling and syntax mistakes. As such, statements may be misunderstood or passages poorly drafted or unclear.¹⁷⁸

Although interpreters are always present in interviews, they are rarely professional interpreters, often inadequately trained, and with limited guidelines on conduct.¹⁷⁹ Asylum applicants often complain about the quality of the interpretation as well as the impartiality/attitude of the interpreter, but their complaints are seldom addressed by the Asylum Service.¹⁸⁰ It has been noted that although asylum applicants are asked by the interviewing officer whether they can understand the interpreter, they may be reluctant to admit that there is an issue with comprehension and prefer to proceed with the interview. For example, this may be because they feel they have no other choice or are unwilling to wait for a longer period of time (sometimes months) for another interview to be scheduled.¹⁸¹ In addition, there have been cases where the applicant has complained about the interpreter regarding the quality of interpretation or attitude, and this has been perceived as a lack of cooperation on behalf of the applicant.¹⁸²

In the case of interviews carried out by EUAA caseworkers, the interpreters are often provided under the EUAA Support Plan and may have been brought to Cyprus for this purpose. These interpreters have received training and follow Standard Operating Procedures, and the quality is in most cases evidently better.¹⁸³

¹⁷⁵ IPAC, Case no. 1243/2022, C.F.N.S v. Asylum Service, Decision issued 25 September 2024, available in Greek [here](#).

¹⁷⁶ Article 13A(9)(b) Refugee Law.

¹⁷⁷ Article 13A(9)(c) Refugee Law.

¹⁷⁸ Based on review of cases by the Cyprus Refugee Council.

¹⁷⁹ KISA, *Comments and observations for the forthcoming 52nd session of the UN Committee against Torture*, April 2014, available in Greek at: <http://bit.ly/112c0K3>, pp. 39-40.

¹⁸⁰ Information provided by the Cyprus Refugee Council.

¹⁸¹ Information from legal advisors of the Cyprus Refugee Council present at the interviews.

¹⁸² Information based by on cases reviewed the Cyprus Refugee Council.

¹⁸³ Information based by on cases reviewed the Cyprus Refugee Council.

1.3.3. Recording and transcript

The Refugee Law permits audio/video recordings.¹⁸⁴ However, in practice only a *verbatim* transcript of the interview is drafted.

The law also foresees that the examiner must provide the applicant with an opportunity to make comments and/or provide clarifications orally and/or in writing with regard to any mistranslations or misconceptions appearing in the written report or in the text of the transcript, at the end of the personal interview or within a specified timeframe before a decision is taken by the Head of the Asylum Service on the asylum application.¹⁸⁵ Furthermore, the legal representative/lawyer can intervene once the interview is concluded,¹⁸⁶ and this is the only stage at which corrections are permitted. However, in practice, the situation varies between examining officers, as some officers will allow such corrections and will only take into consideration the corrected statement, whereas others will allow for corrections but then consider the initial statement and the corrected statement to be contradictory and then use this as evidence of lack of credibility on behalf of the applicant. In some cases, the officer does not accept any corrections at all.¹⁸⁷

There are often complaints by asylum applicants that the transcript does not reflect their statements, which is attributed either to inadequate interpretation or to other problems with the examining officer, such as not being adequately trained. This is particularly the case for examination of cases of vulnerable persons or sensitive issues, especially for cases of vulnerable persons that were not identified or examined by an examining officer trained to deal with such cases. Other complaints include examining officers not being impartial, having a problematic attitude, and not allowing corrections or clarifications on the asylum applicant's statements. As only a *verbatim* transcript of the interview is drafted it is difficult for applicants to substantiate their complaints.¹⁸⁸

According to the law, before the decision is issued on the asylum application, the applicant and/or the legal advisor/lawyer has access either to the report of the personal interview, the text of the audio, and/or visual recording of the personal interview.¹⁸⁹ When the audio and/or visual recording of the personal interview is carried out, access is provided only if the applicant proceeds with a judicial review of the asylum application before the IPAC,¹⁹⁰ with the exception of applications examined under the accelerated procedure.

As audio/video recording is not used in practice, access to the report of the personal interview should be provided, prior to the issuance of the decision. According to the Asylum Service, such access is provided and applicants are informed of this right during the personal interview. However, very few applicants seem to be aware of this right and there is no evidence of anyone exercising it.¹⁹¹ Access entails reviewing the report, which is usually in English, without translation/interpretation and without having a right to receive a copy of it, which may also contribute to applicants not being able to access this right. Furthermore, very few applicants have a legal advisor/lawyer at first instance, and even if they do, few lawyers are familiar with this right to access or will take the time to request access. However, in the rare cases where access is requested, it seems to be granted.¹⁹²

Regarding asylum applications examined whilst in detention, the overall quality of the examination of the claim is not particularly affected by the fact that the applicant is in detention, as the examination, including the personal interview, is carried out by an officer/caseworker from the Asylum Service with the assistance

¹⁸⁴ Article 18(2A)(a)(i) Refugee Law.

¹⁸⁵ Article 18(2A)(a)(iii) Refugee Law.

¹⁸⁶ Article 18(1A) Refugee Law.

¹⁸⁷ Information based on cases reviewed by the Cyprus Refugee Council.

¹⁸⁸ Information based on cases reviewed by the Cyprus Refugee Council.

¹⁸⁹ Article 18(2B)(a) Refugee Law.

¹⁹⁰ Article 18(2B)(b) Refugee Law.

¹⁹¹ Information provided by the Cyprus Refugee Council.

¹⁹² Information based on cases reviewed by the Cyprus Refugee Council.

of an interpreter. However, it is evident that the psychological state of individuals in detention is rarely taken into consideration during the interviewing process, including possible victims of torture, trafficking or violence. Interviews are in most cases carried out in a private room in **Menogia** Detention Centre by a caseworker of the Asylum Service, stationed in Menogia. If detained in Menogia, the interview usually takes place within 1-2 months. However, if detained in holding cells in a police station, the interview is often delayed, and cases are often identified to with cases in 2020, 2021 and 2022 found to have reached 6 months with no interview. In 2023 and 2024, delays still occurred. ¹⁹³

1.4. Appeal

Indicators: Regular Procedure: Appeal

1. Does the law provide for an appeal against the first instance decision in the regular procedure?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<input checked="" type="checkbox"/> Judicial	<input type="checkbox"/> Administrative
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Some grounds <input type="checkbox"/> No
2. Average processing time for the appeal body to make a decision:

❖ Regular Procedure:	6-18 months
❖ Accelerated procedures:	2-3 months

1.4.1. Appeal bodies

In order to ensure that asylum applicants in Cyprus have a right to an effective remedy against a negative decision before a judicial body on both facts and law in accordance with Article 46 of the recast Asylum Procedures Directive, the relevant authorities initiated the modification of the appeal procedure in 2015. Under the previous procedure the appeal body for asylum applications was the Refugee Reviewing Authority (RRA) a second level first-instance decision-making authority that examined recourses (appeals) on both facts and law, but was not a judicial body, and instead provided for a judicial review on both facts and law. Under the new procedure the general Administrative Court was appointed as the appeal body for asylum applications and started to receive cases in 2016. However, as the Administrative Court has jurisdiction to review all administrative decisions, the asylum decisions contributed to a heavy caseload. In view of this, the decision was made to create a specialised court and the International Protection Administrative Court (IPAC) was established and initiated its operations in June 2019. ¹⁹⁴

The RRA continued to operate between 2016 to 2020 examining the existing backlog and finally ceased operations in December 2020. At the time, approximately 400 cases were not concluded and were transferred back to the Asylum Service. In 2022, the Asylum Service set up a team to examine these cases. At the end of 2023, 281 decisions had been issued, of which 54 were granted refugee status; 23 subsidiary protection; 127 rejections; 28 explicit withdrawals and 49 implicit withdrawals; and 89 cases remain pending. In 2024, 52 cases were examined, which corresponded to 93 persons, of which 15 were granted refugee status; 5 granted subsidiary protection; 19 rejections; 4 explicit withdrawals; 7 implicit withdrawals; 1 unequivocal renunciation of subsidiary protection, and 1 cessation of subsidiary protection. 37 cases remained pending by the end of 2024. ¹⁹⁵

The IPAC is competent to examine appeals relating to provisions of the Refugee Law. The IPAC examines both facts and law for asylum applications. When the IPAC initiated operations in July 2019, the existing backlog from the Administrative Court - which at the time was estimated to be approximately 800 cases - was transferred onto the new Court, with the exception of cases that were at the final stages and pending the issuance of a decision. ¹⁹⁶

¹⁹³ Information based on cases reviewed by the Cyprus Refugee Council.

¹⁹⁴ Law N. 73(I)/2018 on the establishment of the Administrative Court for International Protection.

¹⁹⁵ Information provided by the Cyprus Asylum Service.

¹⁹⁶ Information provided by Cyprus Refugee Council.

A 420% increase in the backlog was recorded from January 2021, when 1,194 cases were pending, to December 2021, with 6,406 cases registered as pending, leading to the procedures becoming significantly slower. The top 5 nationalities registering an appeal were: Bangladesh, India, Pakistan, Cameroon, and Nigeria.¹⁹⁷

In 2022, regarding the IPAC's regular procedure, 7,630 appeals were registered as part of the regular procedure and 7,975 decisions were issued, including rejections, positive decisions, implicit and explicit withdrawals. The top 5 nationalities registering an appeal were Pakistan, Bangladesh, India, Nigeria and Nepal. An additional, 1,324 appeals were registered as part of the accelerated procedures and 797 decisions were issued, including rejections, positive decisions, implicit and explicit withdrawals; the majority of which were explicit withdrawals. The top 5 nationalities registering an appeal under the accelerated procedures were Bangladesh, Pakistan, India, Sri Lanka and Nepal.¹⁹⁸

In 2023, 8,159 appeals concerning 8,399 applicants were registered (regular and accelerated procedure) and 9,880 decisions were issued, including rejections, positive decisions, order to review and implicit and explicit withdrawals. The top 5 nationalities registering an appeal were Nigeria, Bangladesh, Pakistan, Democratic Republic of Congo and Nepal.

In 2024, 6,339 appeals concerning 6,661 applicants were registered (regular and accelerated procedure) and 4,672 decisions were issued, including rejections, positive decisions, order to review and implicit and explicit withdrawals. The top 5 nationalities registering an appeal were Cameroon, Nigeria, Democratic Republic of Congo, Sierra Leone and Liberia.

Information on the number and result of appeals in 2024 were provided by the IPAC, and are reported in the following table:

	Appeals in 2024	Refugee status	Subsidiary Protection	Order to Review	Rejection	Explicit/ Implicit Withdrawal	Refugee rate	Sub. Prot. rate	Rejection rate
Total	6,339	25	4	40	1449	2,043/1,061	0,39%	0,06%	22,8%
Breakdown by countries of origin of the total numbers									
Cameroon	1,597	5	1	10	243	259/100	0,07%	0,01%%	3,83%%
Nigeria	1,241	0	0	4	484	751/446	0%	0%	7,63%%
DRC	1,210	4	0	3	245	176/119	0,06%%	0%	3,86%
Liberia	273	0	0	1	11	15/8	0%	0%	0,17%
Sierra Leone	274	1	0	0	70	44/20	0,01%	0%	1,10%
Somalia	218	1	2	1	35	23/15	0,01%	0,03%	0,55%
India	159	0	0	0	49	122/50	0%	0%	0,77%
Pakistan	145	2	0	1	39	113/47	0,03%	0%	0,61%
Bangladesh	142	0	0	1	52	132/61	0%	0%	0,82%
Nepal	126	0	0	2	48	111/54	0%	0%	0,75%

Source: IPAC

Since its establishment, the main challenges identified in relation to the IPAC have been the lack of comprehensive rules of procedures, infrastructure challenges, a lack of administrative and logistical

¹⁹⁷ Information provided by IPAC.

¹⁹⁸ Information provided by IPAC.

support and the size of the backlog (consisting of rising new cases, the backlog from the Administrative Court and appeals against decisions by the Reviewing Authority).

The Court receives support from EUAA. According to the EUAA, in 2022, the proposed line of cooperation regarding second instance determination was focused on: a) backlog reduction; b) supporting the creation of efficient management workflows; c) administrative support, by assisting the administrative tasks of the IPAC and enhancing the procedural rules of the Court; d) coordination (with CAS and internal) and quality level, through supporting the development of quality control mechanisms and the overall coordination of deployed EUAA personnel.¹⁹⁹ Throughout 2022 the above support was implemented however it had limited impact on the backlog that rose significantly, as well as on the time required to examine cases which has increased especially for complicated and well-founded cases. Furthermore, submitting the initial recourse/appeal or further submissions to the Court is extremely time-consuming, as everything must be submitted in person and not digitally, as is the case for other courts in Cyprus. Additionally, the staff of the IPAC Registrar that receives such submissions is not sufficient to address the numbers.

According to the latest version of the 2022-2024 operational plan, by the end of the third quarter of 2022, the number of appeals pending at the IPAC had reached 7,819 (29% increase compared to the same period in 2021). One of the expected outcomes of the operational plan is that the IPAC has a strengthened capacity to manage second instance appeals in line with CEAS by the end of 2024. No information on the progress of this objective is publicly available.

1.4.2. Rules and time limits

In 2020, the RoC amended the Cyprus Constitution and key legislation in order to reduce time limits to submit an appeal against a decision before the IPAC. Since 12 October 2020, appeal times are reduced from 75 days to 30 days for decisions issued in the regular procedure²⁰⁰ and 15 days for the following decisions:²⁰¹

- ❖ A rejected application which has been examined in accordance with the accelerated procedure under section 12D of the Refugee Law,
- ❖ A decision by which an application for refugee status and/or subsidiary protection status is certified as “unfounded”,
- ❖ A decision to determine an asylum application as “inadmissible” in accordance with section 12B(fourth) [12Βτετράκις],
- ❖ A decision which refers to section 9 of the Refugee Law relating to the grant, withdrawal or reduction of benefits foreseen in any of the provisions of the said Law,
- ❖ A decision with is made under the provisions of section 9E (residence and movement) and 9JA(4)(b) [9ΙΑ(4)(β)] (place of residence) of the Refugee Law,
- ❖ A decision made under section 16B (implicit withdrawal), 16C (explicit withdrawal), or section 16D(3)(d) (a subsequent application deemed “inadmissible”) of the Refugee Law.

Information on when and where to appeal is included in the first instance decision issued by the Asylum Service.

Following the amendments to the Refugee Law of October 2020, the Asylum Service currently issues a rejection and return decisions in the same document. For cases examined under the regular procedure, a returns decision is automatically suspended once an appeal is submitted.²⁰² However, appeals relating to cases examined in the accelerated procedure, subsequent applications, decisions that determine the asylum application unfounded or inadmissible, and decisions related to explicit or implicit withdrawal, do not have automatic suspensive effect. A separate application must be submitted to the IPAC requesting

¹⁹⁹ EASO, *Operating Plan, Cyprus 2022-2024*, December 2021, available at: <https://tinyurl.com/y7mayed5>.

²⁰⁰ Article 12A(1) Law N. 73(I)/2018 on the establishment of the Administrative Court for International Protection. (IPAC Law).

²⁰¹ Article 12A(2) Law N. 73(I)/2018 on the establishment of the Administrative Court for International Protection. (IPAC Law).

²⁰² Article 8 (1A) Refugee Law.

the right to remain pending the examination of the appeal. This procedure was not provided for in the procedural rules and there was no available application form or given process aside from jurisprudence which holds that the right to remain must be requested within the given deadline for the submission of the appeal.

In 2022, the new amended procedural rules provide that an application for the right to remain must be submitted at the same time as the appeal, or at least, within the given deadline for the submission of the appeal, which is 15 days.²⁰³ However, very few applicants or their lawyers submit such an application and it is still unclear what the consequences of late submission would be and if it would lead to automatic rejection of the application.²⁰⁴ The Court's procedural rules also now include the application form to be used for the right to remain which is an *ex parte* application.²⁰⁵ However, there is no information provision at the IPAC regarding the need to submit the right to remain application alongside the appeal and although the requirement to make such an application is included in the first-instance decision issued by the Asylum Service, applicants are not adequately informed.²⁰⁶ Furthermore, the form is not readily available at the counter of the Registry of the IPAC, although according to the Court it can be obtained following request by the applicants.

All negative decisions issued by the IPAC can be appealed before the Court of Appeals within 14 days. The onward appeal before the Court of Appeals examines only points of law and does not have suspensive effect. Moreover, this remedy is not communicated in the decision that rejects the appeal before the IPAC.

When the IPAC accepts an appeal, the decision of the Asylum Service is cancelled. The Court may either return the decision to the Asylum Service to be reviewed or directly grant refugee status or subsidiary protection.²⁰⁷ If a lawyer submits an appeal without including a request to grant status, the Court will only annul the decision and order review. It has been noted that lawyers do this mostly due to lack of knowledge on refugee law or, in lesser cases, when there may be procedural issues but the case is weak on merits.²⁰⁸ It has also been noted that certain judges will proceed with the *ex nunc* examination of the case and grant status. Others prefer to annul and order review, especially when there are procedural matters. In such cases, they often site that only the annulment of the contested decision and the referral of the case back to the administration, meaning the Asylum Service, can ensure that the case will be re-examined based on the full implementation of the legal and procedural guarantees for a full and fair examination of the asylum application.²⁰⁹ Lastly, there are also cases where the Asylum Service will revoke their decision especially when it is clearly evident that there were serious procedural issues.²¹⁰

There have been opposing opinions within the IPAC, on whether it is in the Court's jurisdiction to take certain procedural steps that the Asylum Service should have taken, such as referrals for physical or mental health examinations, in cases with claims of torture or violence, so that the Court can carry out an *ex nunc* examination of the case.²¹¹ In a 2023 case the judge made a referral to a psychologist for assessment of a claim of violence. However the legal representative of the state submitted an application/certiorari before the Supreme Court, which led to the referral being quashed as the Supreme Court decided that the IPAC had acted beyond its jurisdiction.²¹² The Supreme Court decision was appealed

²⁰³ Rule 13 of International Protection Administrative Court Procedural Rules of 2019 (3/2019), as amended.

²⁰⁴ Information provided by Cyprus Refugee Council.

²⁰⁵ Form no. 4 annexed to the IPAC Procedural Rules of 2019.

²⁰⁶ Information provided by Cyprus Refugee Council.

²⁰⁷ Article 11 IPAC Law.

²⁰⁸ Information provided by Cyprus Refugee Council.

²⁰⁹ Applicant v Republic of Cyprus through the Asylum Service (Κυπριακή Δημοκρατία και/ή μέσω Υπηρεσίας Ασύλου), Application No 595/2022, 30 September 2024, available in Greek [here](#) and an EUAA summary in English [here](#).

²¹⁰ Information provided by Cyprus Refugee Council.

²¹¹ Ibid.

²¹² Supreme Court, First Instance Jurisdiction, Application No. 31/2023, 7 April 2023, available in Greek at: <https://tinyurl.com/dxfu4cyp>.

before the second instance procedure of the Supreme Court which upheld the first instance decision confirming that the IPAC does not have such jurisdiction.²¹³ Following these decisions, where the IPAC finds substantial procedural errors it is obliged to annul the first instance decision and order a review by the Asylum Service.

The IPAC proceeded to submit a request for a preliminary ruling under Article 267 on whether the IPAC has the power to order a medical examination. In April 2025 the European Court of Justice ruled that in order to satisfy the requirement of a full and *ex nunc* examination, a national court of first instance hearing an action against a decision of the determining authority refusing to grant an application for international protection must have the power to order a medical examination of the applicant for international protection, where it takes the view that the use of that examination is necessary or relevant for the purposes of assessing that application.²¹⁴

In 2023, the IPAC issued 14 decisions granting refugee status, 5 decisions granting subsidiary protection, and 23 decisions ordering review. In 2024, the IPAC issued 25 decisions granting refugee status, 4 decisions granting subsidiary protection, and 40 decisions ordering review.²¹⁵

Procedure

For information on the procedure before the previous appeal body Refugee Reviewing Authority (RRA) please refer to previous updates of the AIDA country report.²¹⁶

The procedure before the IPAC is judicial. Asylum applicants can also submit an appeal without legal representation. The court fees to submit an appeal are € 96 if the applicant submits it without a lawyer, whereas if the appeal is submitted by a lawyer the court fees are € 137. Furthermore, if the appeal does not succeed, the decision will be issued with a cost order in most cases of approximately 500 EUR if not represented by a lawyer and approximately 1,000 EUR if represented by a lawyer, which the applicant is expected to pay. In the past, these orders were rarely pursued however, from 2022 onwards these orders are systematically pursued and when an applicant applies for voluntary return these amount will often be deducted by the monetary incentive offered as part of the voluntary return program.²¹⁷

Upon submitting the appeal and during court proceedings, applicants without legal representation rely heavily on court interpreters for assistance, including guidance for hearings and written submissions. As a result, the court interpreters fill the gap created by the lack of legal representation often leading to incorrect advice and guidance and in some instances raising questions of exploitation.²¹⁸ In view of the sharp increase in appeals submitted in 2021 and onwards, the Court Registrar utilised the court interpreters to cope with the flow of applicants, so as to facilitate access. This, however, led to concerns on the information provided and on the possible exploitation of applicants by interpreters. For example, reports were received about applicants being requested to pay interpreters, when such costs are in fact supposed to be covered by the Court and even reports of an interpreter advising the applicant on the chances of success of the case.²¹⁹

The Refugee Law allows access, before the first instance decision is issued, to the interview transcript, assessment/recommendation, supporting documents, medical reports, and country of origin information (COI) that was used in support of the decision.²²⁰ However, the vast majority of asylum applicants as well

²¹³ Supreme Court, Second Instance Jurisdiction, Application No. 30/2023, 15 May 2023, available in Greek at: <https://tinyurl.com/jaybc6cj>.

²¹⁴ CJEU, Case C-283/24, *Barouk*, judgment of 3 April 2025, available [here](#).

²¹⁵ Information provided by the IPAC.

²¹⁶ AIDA, *Country Report: Cyprus, 2020 Update 2020*, p. 38, April 2021, available at: <https://bit.ly/3f4cU0e>; AIDA, *Country Report: Cyprus, 2019 Update*, pp. 34-37, April 2020, available at: <https://bit.ly/3QWGySj>.

²¹⁷ Information provided by Cyprus Refugee Council.

²¹⁸ Ibid.

²¹⁹ Ibid.

²²⁰ Article 18(2B) and (7A) Refugee Law.

as legal advisors/representatives do not know of this right, and/or do not exercise it. In the case of asylum applicants this is likely due to the lack of information on this right as it is not communicated to them in any way or at any part of the procedure, as well as due to language obstacles as the content of the file is in most cases in English. In the case of legal advisors/representatives only an extremely small number of asylum applicants have legal representation at first instance and in the few cases that do have a legal representative, they may not have knowledge of the right or may not consider it being a worthwhile use of time and will wait for the issuance of the decision.²²¹

Access is also provided after the rejection of the asylum application, which is mentioned briefly in the rejection letter. Again, the vast majority of asylum applicants do not seem to be aware of this right or do not exercise it. Access consists of first reviewing the file and taking notes about the documents before an administration officer of the Asylum Service; the copying or scanning of the documents is strictly prohibited. Even if an asylum applicant is aware of this right, as documents are mostly in English, such as COI reports, it is difficult for individuals to effectively access their file as they will not be able to understand the content or take copies for someone to translate or to assess. Up until 2022 the first instance decision constituted a single page, with very limited information on the reasoning of the decision. However, from late 2022 onwards, a detailed reasoning of the decision is provided in cases of negative decisions. This is a positive development as it provides the applicant and legal advisors/lawyers with immediate access to the reasons the asylum application has been rejected. The reasoning is only provided in English.²²²

Legal advisors/representatives also have a right to access the file upon issuance of a negative decision, however in practice this will very rarely be done as once an appeal is submitted a copy of the entire file is provided to both parties.

The procedural rules followed by the IPAC were not considered sufficient, as they are extremely brief and, for the most part, refer to the procedural rules of the Administrative Court, which examines only points of law.²²³ This entails important gaps concerning issues related to asylum claims, such as the examination of expert witnesses or the examination of additional evidence or submissions of additional documents provided by the applicant during the procedures. EASO highlighted the need to invest in enhancing the case management system and procedural rules of the IPAC in the 2021 operating plan for Cyprus.²²⁴ In the EUAA's Operating Plan for 2022-2024, the enhancement of the procedural rules has been included as support provided to the Court.²²⁵

In 2022 the Regulations were amended in an attempt to address these issues; however, many remain unresolved and unclear such as:²²⁶

- ❖ The procedure that needs to be followed when applicants wish to add evidence in support of their claims remains unclear, and especially in relation to the cross-examination by lawyers representing the state. The current procedure being followed is the procedure followed under civil procedure rules, however, given the administrative nature of the IPAC, in practice this often results in confusing and unclear procedures. For example, regarding the burden and standard of proof applied; the purpose of the cross-examination by the state lawyer - who is not considered a competent national officer to conduct asylum interviews; the conclusions to be drawn from such an examination in relation to the credibility of the applicant and more.

²²¹ Information provided by the Cyprus Refugee Council.

²²² Information provided by the Cyprus Refugee Council.

²²³ International Protection Procedures on The Functioning of The Administrative Court Regulations Of 2019, available in Greek at: <https://bit.ly/3fpogds>.

²²⁴ EASO, *Operating Plan 2021*, December 2020, available at: <https://bit.ly/4akn0Ca>.

²²⁵ EASO, *Operating Plan, Cyprus 2022-2024*, available at: <https://bit.ly/3Q9x090>.

²²⁶ Information provided by Cyprus Refugee Council.

- ❖ Regarding the introduction of the fast-track/accelerated procedure²²⁷ the Attorney General has been removed from the procedure and the Asylum Service is obliged to send the facts and relevant case-file to the Court directly, which has led to faster examination of cases. However, the Court retains the right to request the Attorney General to appear which happens in a significant number of cases.
- ❖ Rule 4 of the amended procedural rules obliges applicants to submit a proof of payment of any previous pending judicial cases before the IPAC, in the case of submitting a new appeal. Failure to do so may result in the rejection of the new appeal, without any further examination of the substance of the case. It is not clear whether applicants are adequately informed about this by the Court Registry when submitting a new appeal. In 2023, cases were reported where the applicant was requested to present proof of payment, however practice differs between judges as some may request the proof of payment immediately, others may allow the applicant to provide proof by the end of the procedure of the new appeal and others may not request such proof. In 2024 there was increase in proof of payment being requested.
- ❖ Rule 12 of the amended procedural rules oblige applicants to be present during the last hearing of their case and upon the announcement of the judge's decision, regardless of whether they are being represented by a lawyer.

In early 2023, there were reports of applicants being arrested immediately after the rejection of their appeal by the IPAC, which effectively terminates their right to remain. This practice was confirmed throughout 2023 with the Immigration police being present at the IPAC and certain judges informing the Immigration Police of cases where the appeal would be rejected which led to arrest of the applicant. In late 2023, this practice was abandoned by the IPAC. However, throughout 2024 and early 2025, the practice is followed by certain judges.²²⁸

1.5. Legal assistance

Indicators: Regular Procedure: Legal Assistance

1. Do asylum applicants have access to free legal assistance at first instance in practice?

<input type="checkbox"/> Yes	<input type="checkbox"/> With difficulty	<input checked="" type="checkbox"/> No
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 - ❖ Does free legal assistance cover:

<input type="checkbox"/> Representation in interview
<input type="checkbox"/> Legal advice
2. Do asylum applicants have access to free legal assistance on appeal against a negative decision in practice?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> With difficulty	<input type="checkbox"/> No
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 - ❖ Does free legal assistance cover

<input checked="" type="checkbox"/> Representation in courts
<input checked="" type="checkbox"/> Legal advice

According to the Law, asylum applicants have a right to legal assistance throughout the asylum procedure, if they can cover the cost.²²⁹ In practice, few asylum applicants are able to cover the cost and free legal assistance is not easily accessible at first or second instance. *Pro bono* work by lawyers was interpreted as being prohibited under the Advocates Law up to 2018.²³⁰ Since its amendment in 2018, the Advocates Law does not explicitly prevent *pro bono* work. However, the IPAC has resisted *pro bono* representation, especially for legal aid applications, considering them against the rules of conduct. In addition, according to the Advocates Law,²³¹ only lawyers who 'practice the profession' can represent cases before courts. Registration as a lawyer who 'practices the profession' requires a law graduate to complete the Bar Associations exams; complete 1 year pupillage at a law office; and practice a legal profession as their main profession. The Bar Association does not consider persons who are employed by legal entities (companies or NGOs) that are not Law firms as practicing a legal profession as their main

²²⁷ Rule 3 (ε) IPAC Regulations.

²²⁸ Information provided by Cyprus Refugee Council.

²²⁹ Article 11(9) Refugee Law.

²³⁰ Article 17(9) Advocates Law.

²³¹ Articles 2 and 11 Advocates Law.

profession. As a result, legal advisors who are employed by an NGO are not permitted to appear before any court, regardless of if they have completed the Bar Association exams and pupillage and their main duties are of a legal nature. Therefore, NGOs can only carry out litigation by contracting the services of an external lawyer or law firm. This restriction limits even further access to free legal assistance for asylum applicants.

Lawyers or legal advisors intervening in international protection cases, whether at first or second instance are not required to have followed specific training.

In 2021, the Bar Association took steps to set up a scheme to provide *pro bono* legal advice to persons who do not have the financial means to contract the services of a lawyer however the scheme does not include assistance for cases eligible for legal aid. Furthermore, only persons receiving the Guaranteed minimum Income (GMI), a form of State benefit, are eligible for assistance on the scheme and asylum applicants are not eligible for the GMI.²³²

1.5.1. Legal information and assistance at first instance

For first instance examination, the Refugee Law mandates that the State ensures, upon request, and in any form the State so decides, that applicants are provided with legal and procedural information free of charge, including at least information on the procedure in light of the applicant's particular circumstances and in case of rejection of the asylum application, information that explains the reasons for the decision and the possible remedies and deadlines.²³³

According to the law,²³⁴ such information can be provided by:

- ❖ Non-governmental organisations;
- ❖ Professional public authorities, provided that they secure the consent of the State authorities;
- ❖ Specialised government agencies, provided the consent of the specialised government agencies is secured (by the Head of the Asylum Service) State authorities;
- ❖ Private lawyers or legal advisers;
- ❖ Asylum Service officers who are not involved in processing applications.

Furthermore, according to the Law, the Head of the Asylum Service has the right to reject a request for free legal and procedural information provided that it is demonstrated the applicant has sufficient resources. They may require for any costs granted to be reimbursed wholly or partially if and when the applicant's financial situation has improved considerably or if the decision to grant such costs was taken on the basis of false information supplied by the applicant. If the applicant refuses or fails to satisfy this requirement, the Head may take legal action to recover the relevant amount due as a civil debt to the RoC.²³⁵

In practice, the above provision of the Law has never been implemented by the State and the only free legal assistance available at first instance is extremely limited, provided by NGOs and dependent upon funded projects. Due to the lack of State-provided legal assistance, UNHCR has consistently funded the "Strengthening Asylum in Cyprus" project, implemented by the NGO Future Worlds Centre from 2006-2017 and by the Cyprus Refugee Council (CyRC) since 2018.²³⁶ Currently the CyRC is the only provider of free legal assistance. Furthermore, the Project provides for only three lawyers for all asylum applicants and beneficiaries of international protection (BIPs) in the country and, therefore, concentrates on the provision of legal advice to as many persons as possible and legal representation only for selected cases

²³² Cyprus Bar Association, *Announcement*, 25 October 2021, available in Greek at: <https://bit.ly/3tC71Ld>; Alphanews, *Justice for All: A step closer to legal aid for vulnerable groups*, 13 July 2022, available in Greek at: <https://bit.ly/3Ti336W>.

²³³ Article 18(7Γ)(a) Refugee Law.

²³⁴ Article 18(7Γ)(c) Refugee Law.

²³⁵ Article 18(7Γ)(d) and (e) Refugee Law.

²³⁶ Cyprus Refugee Council, available at: <https://bit.ly/48pCnHS>.

(mostly precedent-setting cases). The Project has the capacity to provide legal advice to approximately 500 persons per year whereas in 2022, 2023 and 2024 there were over 20,000 applicants pending at first instance.

Although legal assistance was included as a priority under the Asylum, Migration and Integration Fund (AMIF) at a national level, a relevant call for proposals has still not been issued since the introduction of the AMIF as of February 2025.²³⁷ The lack of legal assistance provided by the State, the lack of funding for non-State actors to provide such assistance combined with the overall lack of information provided on asylum procedures (see section on [Information for Asylum Applicants and Access to NGOs and UNHCR](#)) leads to a major gap in the asylum procedures in Cyprus.

Regardless of the significant rise in the number of asylum applicants in recent years, there has been no indication that the State has taken steps to ensure the right to free legal and procedural information. The only reference to the provision of information is in the 2021 EASO operational plan for Cyprus and concerns only persons in the First Reception Centre, **Pournara**. From mid-2021 onwards, two (2) EUAA Information Providers were stationed at the '**Pournara**' Centre, providing group sessions in the presence of interpreters. According to the EUAA, 408 information sessions were delivered in Cyprus and 1,021 counselling sessions were provided in Cyprus in 2022.²³⁸ These include information on the registration process in the Reception Centre, as well as the asylum procedure and reception conditions. However, as the sessions are provided to persons while in Pournara, soon after they entered the country, and not throughout the complicated and often lengthy asylum procedures, the majority of persons require information or further counselling at later stages.²³⁹

Asylum applicants reach NGOs (currently only CyRC) providing legal assistance primarily through word of mouth, especially since information to asylum applicants is often not available or outdated (see section on [Information for Asylum Applicants and Access to NGOs and UNHCR](#)) or via other NGOs that do not have legal assistance. Individual officers working in various departments of the government that come into contact with asylum applicants may refer them to NGOs to receive legal assistance, whereas asylum applicants residing in the reception centre may be referred by the staff. Asylum applicants in detention come into contact with NGOs again through other detainees and through NGOs monitoring visits to the detention centre.²⁴⁰

1.5.2. Legal assistance in appeals

Legal aid is offered by the State only at the judicial stage of the asylum application before the IPAC.²⁴¹ The application for legal aid is subject to a “means and merits” test.²⁴² Regarding the “means” part of the test, an asylum applicant applying for legal aid must show that they do not have the means to pay for the services of a lawyer. This claim is examined by an officer of the Social Welfare Services who submits a report to the IPAC. In the majority of cases, asylum applicants are recognised as not having sufficient resources. However, in 2022, a legal aid application was rejected based on the fact that the applicant was working and receiving a salary of around € 750 per month which was considered adequate to contract the services of a lawyer.²⁴³

The “merits” part of the test is extremely difficult to satisfy. The applicant must show that the “the appeal has a real chance of success”, meaning they must convince the judge, without the assistance of a lawyer, that there is a possibility the Court may rule in their favour if it later examines the appeal. Additionally, in this process the State lawyer representing the Republic acts as an opponent and always submits reasons

²³⁷ Ministry of Interior, *European Funds Unit webpage*, available at: <https://tinyurl.com/5n6hdmn2>

²³⁸ EUAA, *Asylum Report 2022*, <https://bit.ly/40bIkUI>, p. 63.

²³⁹ Information provided by the Cyprus Refugee Council.

²⁴⁰ Information provided by the Cyprus Refugee Council, based on visits to the detention centre.

²⁴¹ Article 6B(2) Legal Aid Law.

²⁴² Article 6B(2)(b)(bb) Legal Aid Law.

²⁴³ Legal Aid Application No. NA 30/2022.

why the appeal does not have a real chance of success and why legal aid should not be provided, leading to an extremely unequal process. As a result, it is nearly impossible for a person with no legal background to satisfy this requirement. Since the extension of legal aid to the asylum procedure in 2010, very few applications for legal aid have been submitted and even less granted.²⁴⁴

Although the IPAC initiated operations in June 2019, statistics were not available for 2019 and 2020. Furthermore, the decisions of the IPAC, including legal aid decisions, were not published systematically on the online platforms CyLaw,²⁴⁵ and Leginet²⁴⁶ as is done by all other Courts in Cyprus. This has made it difficult to monitor the number of applications for legal aid and the success rate. In 2021, with support from EASO, the Court set up a system to collect statistics.

In 2022, there was an increase in the number of applications for legal aid as 225 applications were submitted and 208 decisions issued, however these include legal aid applications related to recourses/appeals challenging decisions on asylum applications as well as immigration detention orders. Of the 208 decisions, 107 were rejected, 43 implicitly or explicitly withdrawn and 58 were positive (32 asylum cases, 18 detention orders).²⁴⁷ In the case of detention orders, access to Legal Aid is only subject to a 'means' test, resulting in most if not all Legal Aid applications granted. Considering that over 8,000 appeals were submitted before the IPAC in 2022 the number still remains low.

In 2023, 189 legal aid applications were submitted challenging decisions on asylum applications; 55 applications were rejected, 34 implicitly withdrawn, 5 explicitly withdrawn and 21 were positive.²⁴⁸ Considering that over 8,000 appeals were submitted before the IPAC in 2023, the number still remains extremely low.

In 2024, some 219 legal aid applications were submitted challenging decisions on asylum applications; 113 applications were rejected, 37 implicitly withdrawn, 17 explicitly withdrawn and 39 were positive.²⁴⁹ Considering that over 6,000 appeals were submitted before the IPAC in 2024, the number still remains extremely low.

Furthermore, in 2024 an amendment to the Legal Aid Law was passed which includes the following:²⁵⁰

- ❖ Legal aid applications will be deemed inadmissible if the appeal is submitted past the appeal deadline.
- ❖ When an applicant is awarded legal aid, they can either choose a lawyer, or have one appointed by the Court. However, a lawyer cannot be re-appointed until all lawyers registered under the "Lawyers' Registry" have either been chosen to represent or have refused to represent. Therefore, if a lawyer is selected to represent an applicant receiving legal aid, that lawyer cannot be chosen to represent any other legal aid beneficiary, until every other lawyer on the list has been considered.
- ❖ Provisions for drafting the "Lawyers' Registry" and how lawyers can register to be included in it.
- ❖ The penalties for fraudulent statements to secure legal aid have increased. Upon conviction, penalties have risen from £450 (Cypriot pounds) to €3000 and imprisonment from 6 months to 2 years.
- ❖ Introduction of penalties for lawyers who request and receive any additional amount in relation to the services provided under the framework of legal aid, beyond the remuneration received in accordance with the Legal Aid Law.

²⁴⁴ According to a search carried out on the CyLaw database, for 2010-2017, approximately 87 applications for legal aid submitted by asylum applicants were found, out of which 9 were granted. The database is available at: <https://bit.ly/442C58C>.

²⁴⁵ The platform is available at: <https://bit.ly/3mo8osU>.

²⁴⁶ Leginet is a subscription-based database for legislation, caselaw and secondary legislation, available at: <https://bit.ly/2WfLqsR>.

²⁴⁷ Information provided by IPAC.

²⁴⁸ Information provided by IPAC.

²⁴⁹ Information provided by IPAC.

²⁵⁰ Legal Aid Law, Amendment 170(I)/2024, available [here](#).

In 2019, the UN Committee against Torture (UNCAT) stated its concern that prospective recipients of legal aid must argue before a court to convince it about the prospects of success of their claim before being granted legal aid.²⁵¹ Moreover, the report of the Working Group on the Universal Periodic Review of Cyprus included a recommendation to ensure that asylum applicants have free legal aid during the examination of their application in first instance and from the assistance of a lawyer.²⁵²

2. Dublin

2.1. General

Dublin statistics: 1 January – 31 December 2024

Outgoing procedure*				Incoming procedure*			
	Requests	Accepted	Transfers		Requests	Accepted	Transfers
Total	1155	938	653	Total	518	135	8
Germany	676	604	381	Germany	179	29	5
France	239	234	186	France	91	15	0
Belgium	62	11	11	Greece	77	52	2
Italy	44	38	36	Austria	32	11	2
Austria	29	8	6	Belgium	30	6	0

Source: Dublin Unit, Cyprus Asylum Service

Outgoing Dublin requests by criterion: 2024		
Dublin III Regulation criterion	Requests sent	Requests accepted
“Take charge”: Articles 8-17:	1151	937
Article 8 (minors)	174	94
Article 9 (family members granted protection)	22	9
Article 10 (family members pending determination)	9	4
Article 11 (family procedure)	1	0
Article 12 (visas and residence permits)	0	0
Article 13 (entry and/or remain)	0	0
Article 14 (visa free entry)	0	0
“Take charge”: Article 16	11	4
“Take charge” humanitarian clause: Article 17(2)	932 (790 VSM)	827(786 VSM)
“Take back”: Article 18 and 20(5)	4	0
Article 18 (1) (b)	4	0
Article 18 (1) (c)	0	0
Article 18 (1) (d)	0	0
Article 20(5)	0	0

Source: Dublin Unit, Cyprus Asylum Service

²⁵¹ UN CAT, *Concluding Observations on the Fifth Periodic Report of Cyprus*, 23 December 2019, available at: <https://tinyurl.com/3jcjevns>.

²⁵² UN Human Rights Council, *Report of the Working Group on the Universal Periodic Review: Cyprus, Twenty seventh session*, 5 April 2019, available at <https://tinyurl.com/5n6emnca>.

Incoming Dublin requests by criterion: 2024		
Dublin III Regulation criterion	Requests received	Requests accepted
“Take charge”: Articles 8-17	74	44
Article 8 (minors)	0	0
Article 9 (family members granted protection)	0	0
Article 10 (family members pending determination)	1	1
Article 11 (family procedure)	1	0
Article 12 (visas and residence permits)	64	44
Article 13 (entry and/or remain)	5	2
Article 14 (visa free entry)	0	0
“Take charge”: Article 16	0	0
“Take charge” humanitarian clause: Article 17(2)	3	0
“Take back”: Articles 18 and 20(5)	443	91
Article 18 (1) (b)	424	86
Article 18 (1) (c)	2	2
Article 18 (1) (d)	17	3
Article 20(5)	0	0

Source: Dublin Unit, Cyprus Asylum Service

2.1.1. Application of the Dublin criteria

The applicant is interviewed by Dublin Unit officers of the Asylum Service and all documents and information are collected in collaboration with them. For unaccompanied minors, both the interview and family tracing are done in the presence and with the collaboration of the Social Welfare Service’s officers. Following this, the request is submitted via ‘DubliNet’ to the relevant Member State.²⁵³

In practice, the evidential requirements requested from the asylum applicant that are needed to prove family links are mostly documents that prove familial relationship with the individual in question, such as identity documents, family registration documents, birth/marriage certificates, photographs, any documents available and, when necessary, DNA tests. The authorities conducting the Dublin procedure will apply the family provisions even if the asylum applicant has not indicated the existence of family members in another Member State from the outset.²⁵⁴

The criterion most frequently used in practice for incoming requests is previous applications for international protection; for outgoing requests, family unity for unaccompanied children.²⁵⁵

2.1.2. The dependent persons and discretionary clauses

The humanitarian clause may be applied when the other criteria are not applicable and humanitarian reasons arise, whereas the sovereignty clause may be applied when the transfer is not going to be implemented within the time limits for reasons not foreseen in the Regulation, i.e., health issues. In 2024, 381 take charge requests were made under the humanitarian clause, 93 of which were accepted.²⁵⁶

²⁵³ Information provided by Cyprus Refugee Council.

²⁵⁴ Ibid.

²⁵⁵ Cyprus Asylum Service.

²⁵⁶ Ibid.

In June 2022, the voluntary relocation programme was agreed with the aim of providing concrete support to frontline countries (MED5) to manage increased flows of asylum applicants. The programme is supported by EU funding, at the request of the concerned Member States, with assistance from the EU Asylum Agency and IOM. More specifically, resettlement activities are 100% financed by the Asylum, Migration and Integration Fund (AMIF). The transfers are carried out with the cooperation of the Asylum Service of the Ministry of the Interior of Cyprus, the European Asylum Service (EUAA), the European Commission and the International Organization for Migration (IOM).²⁵⁷ In December 2022, the first relocations of 48 Syrian and Afghan refugees took place.²⁵⁸

In 2023, 1,773 persons were relocated, mainly to Germany and France, and some to Romania, Bulgaria, Belgium, Finland, Norway, and Portugal. Persons relocated are mainly nationals from Syria, Afghanistan and smaller numbers from Iraq, the Democratic Republic of Congo, Cameroon, Somalia, Nigeria, Sierra Leone, Djibouti, and Palestine.²⁵⁹

In 2024, 852 persons (592 cases) were relocated mainly to Germany and France, and to a lesser extent Belgium and Bulgaria. Persons relocated are mainly nationals from Syria, Afghanistan and smaller numbers from Cameroon, DRC, Ethiopia, Guinea, Iran, Iraq, Kenya, Liberia, Nigeria, Sierra Leone and Somalia.²⁶⁰

In view of the rise of asylum applicants from Syria requesting relocation to other EU Member States, upon arrival, in mid-2023 the government decided to exclude new asylum applicants from the voluntary relocation Program to act as a deterrent to future arrivals. Persons arriving in Cyprus from January 2023 onwards are not eligible to the Program.²⁶¹ However, the majority of asylum applicants are not aware of this limitation and continue to request upon arrival when they will be relocated.²⁶²

2.2. Procedure

Indicators: Dublin: Procedure

1. Is the Dublin procedure applied by the authority responsible for examining asylum applications?
☒ Yes ☐
2. On average, how long does a transfer take after the responsible Member State has accepted responsibility?
3-6 months

All asylum applicants aged 14 and over as well as their dependants, also aged 14 and over, are systematically fingerprinted and checked in Eurodac.²⁶³ There is no specific policy in place for cases where applicants refuse to be fingerprinted and, to CyRC's knowledge, there have been no cases to indicate such practice.

The Dublin procedure is systematically applied in all cases;²⁶⁴ when lodging an application for asylum, the applicant also fills in a Dublin questionnaire where they have to state any previous travel or any relatives present in another Member State. Should they have travelled through another Member State or have relatives present in one Member State, the Dublin Unit invites the applicant for an interview.

²⁵⁷ Asylum Service, *Relocation*, available at: <https://tinyurl.com/4xt27tfm>

²⁵⁸ Kathimerini, First group of asylum applicants relocated to Germany from Cyprus, 22 January 2023, available at: <https://bit.ly/3LsEx1c>; Schengen Visa, First Group of Asylum Applicants Gets Relocated From Cyprus to Germany, 21 December 2022, available at: <https://bit.ly/3JFjeHh>.

²⁵⁹ Information provided by the Cyprus Asylum Service.

²⁶⁰ Ibid.

²⁶¹ InfoMigrants, *Cyprus excludes new asylum applicants from resettlement scheme*, 20 July 2023, available at: <https://bit.ly/3H26qJK>

²⁶² Information provided by Cyprus Refugee Council.

²⁶³ Article 11A Refugee Law.

²⁶⁴ Article 11B Refugee Law.

Despite improvements in 2021 in relation to the submission of take-charge requests within the timeline set by the Dublin Regulation, delays were observed in the first half of 2022 in cases of adults and unaccompanied children alike. The situation improved during the second half of 2022 and throughout 2023 as the team handling take charge requests was staffed with additional personnel. In 2024, the situation continued improving, the majority of the take charge requests were submitted within the timeframe of the regulation with minor exceptions mainly concerning cases of unaccompanied children informing the authorities of their intent to submit an application after their initial screening at Pournara, the First Reception Center.²⁶⁵

2.2.1. Individualised guarantees

The Dublin Unit seeks individualised guarantees that the asylum applicant will have adequate reception conditions and access to the asylum procedure upon transfer to countries facing difficulties in their asylum systems.²⁶⁶ Such guarantees are sought after the responsible Member State has agreed to take charge of/take back the applicant.

2.2.2. Transfers

When another EU Member State accepts responsibility for the asylum applicant, it takes on average three-six months²⁶⁷ before the applicant is transferred to the responsible Member State. Asylum applicants are not detained for the purpose of transfers, whereas the actual transfer takes place under supervision or when necessary, under escort.

Transfers carried out: 2019-2024				
2020	2021	2022	2023	2024
47	27	119 (Out of which 47 were under relocation programmes)	1,551 (Out of which 1,288 were under relocation programmes)	855 (Out of which 592 were under relocation programmes)

Source: Dublin Unit, Cyprus Asylum Service

2.3. Personal interview

Indicators: Dublin: Personal Interview

☒ Same as regular procedure

- Is a personal interview of the asylum applicant in most cases conducted in practice in the Dublin procedure? ☒ Yes ☐ No
 ❖ If so, are interpreters available in practice, for interviews? ☒ Yes ☐ No
- Are interviews conducted through video conferencing? ☐ Frequently ☒ Rarely ☐ Never

The interview for the Dublin procedure is carried out by the Dublin Unit of the Asylum Service. These interviews are conducted in the same manner as in the [regular procedure](#), meaning that an interpreter is always available when needed and applicants can choose the gender of the interpreter²⁶⁸ and/or interviewer.²⁶⁹

²⁶⁵ Information provided by the Cyprus Refugee Council.

²⁶⁶ Information provided by the Dublin Unit, July 2017.

²⁶⁷ Based on estimations from practical experience of the Cyprus Refugee Council.

²⁶⁸ Article 13A(9)(c).

²⁶⁹ Article 13A(9)(b).

The interview for the Dublin procedure focuses on determining the Member State responsible for examining the application for international protection. For possible “take back” cases, questions focus on the applicants’ entry into other Member States prior to reaching Cyprus, whether they have applied for asylum in said countries as well as the reasons for applying, the duration of stay along with specific dates of entry, and the reason for leaving the country. For family unity reasons, questions focus on whether the individual has family members in other Member States, as well the relationship with the individual in question, their relatives’ status in the country, and whether they can obtain any documents proving the familial relationship. Applicants are also informed about the Dublin procedure, what it entails, and the possibilities and effect on the case.²⁷⁰

2.4. Appeal

Indicators: Dublin: Appeal

☐ Same as regular procedure

1. Does the law provide for an appeal against the decision in the Dublin procedure?

- | | | |
|----------------------------|--|---|
| ❖ If yes, is it | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| ❖ If yes, is it suspensive | <input checked="" type="checkbox"/> Judicial | <input type="checkbox"/> Administrative |
| | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

The law allows for an appeal against Dublin decisions before the IPAC during which the applicant has a right to remain within the territory.²⁷¹ The rules and procedure are the same as in the regular procedure (see [Regular Procedure: Appeal](#)).

The majority of cases are not challenged by asylum applicants, as they are related to family unity reasons and the asylum applicants’ preference is to not remain in Cyprus.

2.5. Legal assistance

Indicators: Dublin: Legal Assistance

☒ Same as regular procedure

1. Do asylum applicants have access to free legal assistance at first instance in practice?

- | | | | |
|-------------------------------------|--|--|--|
| | <input type="checkbox"/> Yes | <input type="checkbox"/> With difficulty | <input checked="" type="checkbox"/> No |
| ❖ Does free legal assistance cover: | <input type="checkbox"/> Representation in interview | | |
| | <input type="checkbox"/> Legal advice | | |

2. Do asylum applicants have access to free legal assistance on appeal against a Dublin decision in practice?

- | | | | |
|------------------------------------|---|---|-----------------------------|
| | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> With difficulty | <input type="checkbox"/> No |
| ❖ Does free legal assistance cover | <input checked="" type="checkbox"/> Representation in courts <input checked="" type="checkbox"/> Legal advice | | |

There is no access to free legal assistance from the State during first instance Dublin procedures. Such cases can be assisted by the free legal assistance provided for by NGOs under project funding, but their capacity is extremely limited (see [Regular Procedure: Legal Assistance](#)). Legal aid is offered by the State only for the judicial review of the Dublin decision by the IPAC.²⁷² The application for legal aid is subject to a “means and merits” test and is extremely difficult to be awarded (see [Regular Procedure: Legal Assistance](#)). However, asylum applicants, as stated above, rarely submit appeals against the Dublin transfer; as such, no free legal assistance request has ever been submitted during the appeal procedure.

²⁷⁰ Information provided by testimonies of individuals who have undergone a Dublin interview.

²⁷¹ Articles 12A(η) IPAC Law.

²⁷² Article 68(8) Legal Aid Law.

2.6. Suspension of transfers

Indicators: Dublin: Suspension of Transfers

1. Are Dublin transfers systematically suspended as a matter of policy or jurisprudence to one or more countries? ☐ Yes ☒ No
- ❖ If yes, to which country or countries?

The majority of cases that fall under the Dublin procedure in Cyprus are outgoing requests from UASC and adult asylum applicants requesting to join family members in other Member States, or incoming requests from other Member states requesting for Cyprus to take responsibility ("take back" requests). In case a transfer is not possible within the time limits foreseen by the Dublin Regulation, Cyprus will assume responsibility for examining the asylum application and asylum applicants will have full access to reception conditions and all other rights enjoyed by asylum applicants.

There are no national court rulings on Dublin transfers.

2.7. The situation of Dublin returnees

Persons returned to Cyprus: 2016-2024								
2016	2017	2018	2019	2020	2021	2022	2023	2024
4	5	6	1	2	1	10	18	8

Source: Dublin Unit, Cyprus Asylum Service

Asylum applicants transferred back from another Member State who had not been issued with a first instance decision prior to their departure from RoC were, in most cases, not detained upon return and the examination of the asylum application resumed. However, in 2023 and 2024, there were cases identified where the asylum application was considered to have been implicitly withdrawn and the asylum applicants were detained upon return.²⁷³

In the event that asylum applicants returned are not detained, they have a right to reception conditions. However, they will face the same difficulties all asylum applicants face in accessing reception conditions (see section: [Reception Conditions](#)). If they have no place to stay on their own, they may be transferred to **Kofinou** Reception Centre, which is an open centre for asylum applicants, however usually there is no availability at the Centre. If there is no availability at the Centre and in view of the lack of other accommodation options for asylum applicants, they may become homeless or be hosted by other asylum applicants in below standard accommodation. In cases of vulnerable persons, they may be provided with accommodation by the social welfare services, but this is not always ensured and stay is temporary (usually 3 months), after which the asylum applicant is expected to have identified accommodation alternatives without assistance.²⁷⁴

In February and December 2021, two Dutch Courts allowed asylum applicants whose first asylum country was Cyprus to be included in the Dutch asylum procedure, as they would not benefit from adequate reception conditions in Cyprus, and the alternative of returning to Cyprus entailed the risk of being subjected to degrading or inhumane treatment due to bad reception conditions. Both decisions also referred to **Pournara** and the low standard of living conditions.²⁷⁵

²⁷³ Information provided by the Cyprus Refugee Council.

²⁷⁴ Information provided by the Cyprus Refugee Council.

²⁷⁵ Court of The Hague, case NL21.2036, available in Dutch at: <https://bit.ly/3IU5xCG>; Court of the Hague, NL21.17448 en NL.1745, available in Dutch at: <https://bit.ly/3KtS3Op>.

There is no information available as to whether requests sent to the Dublin Unit ask for the provision of individual guarantees for incoming transfers.

For asylum applicants transferred back from another Member State and for whom a final decision had already been issued prior to their departure from RoC, deportation procedures are initiated.

3. Admissibility procedure

3.1. General (scope, criteria, time limits)

The Refugee Law provides that an application for international protection is inadmissible only where:²⁷⁶

- ❖ another Member State has granted international protection;
- ❖ a country which is not a Member State is considered as a **First Country of Asylum** for the applicant;
- ❖ a country which is not a Member State is considered as a **Safe Third Country** for the applicant;
- ❖ the application is a **Subsequent Application**, where no new elements or findings relating to the examination of whether the applicant qualifies as a BIP have arisen or have been presented by the applicant; or
- ❖ a dependant of the applicant lodges an application, after they have consented to have their case be part of an application lodged on their behalf, and there are no facts relating to the dependant's situation which justify a separate application.

Furthermore, where an application is considered inadmissible, the Head of the Asylum Services closes the file and stops the examination of the application by a decision which is taken and registered in the file without following the regular or accelerated procedure.²⁷⁷

Inadmissibility decisions are mostly issued in cases where another Member State had granted international protection and for subsequent applications where it was deemed that no new elements or findings arose or were presented.²⁷⁸ It should be noted that BIPs that received international protection in another Member State are considered asylum applicants when they lodge a new application for international protection and have access to reception conditions during the first instance examination of the application; they are excluded only if, as the result of an appeal, the application is found inadmissible. The Asylum Service does not issue data, on the number of asylum applications which have been dismissed as inadmissible, except for subsequent applications.²⁷⁹

3.2. Personal interview

Indicators: Admissibility Procedure: Personal Interview

☐ Same as regular procedure

1. Is a personal interview of the asylum applicant in most cases conducted in practice in the admissibility procedure?

☐ Yes ☒ No

☐ Yes ☒ No

☒ Yes ☐ No

 - ❖ If so, are questions limited to identity, nationality, travel route?
 - ❖ If so, are interpreters available in practice, for interviews?
2. Are interviews conducted through video conferencing? ☐ Frequently ☐ Rarely ☐ Never

According to the law,²⁸⁰ before a decision on admissibility is taken, the Asylum Service allows the applicant to state their views on the application of the grounds and, for this purpose, carries out a personal interview

²⁷⁶ Article 12B-quater(2) Refugee Law.

²⁷⁷ Article 12B-quater(1) Refugee Law.

²⁷⁸ Based on information provided by the Cyprus Refugee Council.

²⁷⁹ Information provided by Cyprus Refugee Council.

²⁸⁰ Article 12B-quater(3) Refugee Law.

on the admissibility of the application. In practice, a short interview will be carried out and always in the presence of an interpreter. However, in the case of subsequent applications,²⁸¹ the Law was amended in 2020 and the admissibility of the new elements or findings is examined without conducting an interview (see section: [Subsequent applications](#)).²⁸²

3.3. Appeal

Indicators: Admissibility Procedure: Appeal

☒ Same as regular procedure

1. Does the law provide for an appeal against an inadmissibility decision?

- | | | |
|--|--|--|
| ❖ If yes, is it | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| | <input checked="" type="checkbox"/> Judicial | <input type="checkbox"/> Administrative |
| ❖ If yes, is it automatically suspensive | <input type="checkbox"/> Yes | <input type="checkbox"/> Some grounds <input checked="" type="checkbox"/> No |

The law allows for an appeal against inadmissibility decisions before the IPAC.²⁸³ The appeal does not have suspensive effect and a separate application must be submitted, requesting the right to remain. The rules and procedure are the same as in the [Regular Procedure: Appeal](#).

3.4. Legal assistance

Indicators: Admissibility Procedure: Legal Assistance

☒ Same as regular procedure

1. Do asylum applicants have access to free legal assistance during admissibility procedures in practice?

- | | | | |
|-------------------------------------|--|--|--|
| | <input type="checkbox"/> Yes | <input type="checkbox"/> With difficulty | <input checked="" type="checkbox"/> No |
| ❖ Does free legal assistance cover: | <input type="checkbox"/> Representation in interview | | |
| | <input type="checkbox"/> Legal advice | | |

2. Do asylum applicants have access to free legal assistance on appeal against an inadmissibility decision in practice?

- | | | | |
|------------------------------------|--|---|-----------------------------|
| | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> With difficulty | <input type="checkbox"/> No |
| ❖ Does free legal assistance cover | <input checked="" type="checkbox"/> Representation in courts | | |
| | <input checked="" type="checkbox"/> Legal advice | | |

There is no access to free legal assistance from the state before the Asylum Service during any procedure, including the admissibility procedure. However, such cases can benefit from free legal assistance provided by NGOs under project funding, although the capacity of these projects is extremely limited (see [Regular Procedure: Legal Assistance](#)). For an appeal before the IPAC an application for legal aid can be submitted, however, as mentioned above, the success rate of legal aid applications in general are low.

3.5. Suspension of returns for beneficiaries of protection in another Member State

Cyprus has not suspended returns of beneficiaries of international protection to any EU Member States or Associated Countries.

²⁸¹ Article 16D(2) Refugee Law.

²⁸² Article 16D(2) Refugee Law.

²⁸³ Articles 12B-quater(1) Refugee Law.

4. Border procedure (border and transit zones)

There is no border procedure in Cyprus.

5. Accelerated procedure

5.1. General (scope, grounds for accelerated procedures, time limits)

As in the regular procedure, the Asylum Service is the authority responsible for taking decisions at first instance in accelerated procedures.

Article 12Δ of the Refugee Law provides that an application must be processed as priority and within 30 days under an accelerated procedure where the responsible officer considers that the applicant:

- ❖ Comes from a country where there is no serious risk of persecution;²⁸⁴
- ❖ Comes from a safe third country;²⁸⁵
- ❖ Comes from a safe European third country;²⁸⁶
- ❖ Comes from a safe country of origin;²⁸⁷
- ❖ Lodges an inadmissible application;²⁸⁸
- ❖ Comes from a first country of asylum;²⁸⁹
- ❖ Meets one of the following criteria:²⁹⁰
 - the applicant, in submitting their application and presenting the facts, has only raised issues that are not relevant or of minimal relevance to the examination of whether they qualify as a refugee;
 - the applicant is from a safe country of origin within the meaning of the Law;²⁹¹
 - the applicant has misled the authorities by presenting false information or documents or by withholding relevant information or documents with respect to their identity and/or nationality that could have had a negative impact on the decision;
 - it is likely that, in bad faith, the applicant has destroyed or disposed of an identity or travel document that would have helped establish their identity or nationality;
 - the applicant has made clearly inconsistent and contradictory, clearly false or obviously improbable representations which contradict sufficiently verified country-of-origin information, thus making their claim clearly unconvincing in relation to whether they qualify as a BIP by virtue of the Law;
 - the applicant has introduced a subsequent application for international protection that is not inadmissible in accordance with Article 16Δ;
 - the applicant is making an application merely in order to delay or frustrate the enforcement of an earlier or imminent decision which would result in their removal;
 - the applicant entered the territory of the Republic unlawfully or prolonged their stay unlawfully and, without good reason, has either not presented themselves to the authorities or not made an application for international protection as soon as possible, given the circumstances of their entry;
 - the applicant may, for serious reasons, be considered a danger to the national security or public order, or has been forcibly expelled for serious reasons of public security or public order under national law;

²⁸⁴ Article 12A Refugee Law.

²⁸⁵ Article 12B Refugee Law.

²⁸⁶ Article 12B-bis Refugee Law.

²⁸⁷ Article 12B-ter Refugee Law.

²⁸⁸ Article 12B-quater Refugee Law.

²⁸⁹ Article 12B-quinqies Refugee Law.

²⁹⁰ Article 12Δ(4) Refugee Law.

²⁹¹ Article 12B-ter Refugee Law.

- the applicant refuses to comply with an obligation to have their fingerprints taken in accordance with the Eurodac Regulation.

The 30-day time limit to issue a decision may be extended for a period that does not exceed two months upon the recommendation of the case examiner and approval by the Head of the Asylum Service.²⁹²

In practice, until 2019, the accelerated procedure had never been used. In late 2019, a pilot for the accelerated procedure was initiated in the Paphos district in order to respond to the influx of cases from one country of origin,²⁹³ namely **Georgian** nationals.²⁹⁴ In 2022, asylum applications from countries considered safe or countries facing a humanitarian crisis were at times prioritised through a fast-track procedure. From September 2022 onwards, the use of accelerated procedures increased, focusing mostly on applications from the list of 'safe countries' and specifically nationalities such as Pakistan, Bangladesh, India, Nepal and Nigeria.

In 2023, accelerated procedures were again used for applicants from the same countries as in 2022. However, not all nationals from these countries are examined under the accelerated procedure, mainly due to lack of capacity on behalf of the authorities to respond to the stricter timeframes provided for accelerated procedures under the Law. It is not clear what criteria is applied to select which applicants are examined under accelerated procedures.²⁹⁵

In 2024, accelerated procedures were used for 209 applicants from Nigeria, Bangladesh, India, Nepal and Pakistan.²⁹⁶

Applicants determined as vulnerable through the vulnerability assessment procedure at Pournara are exempted from the accelerated procedure.

Cases have been identified that were initially being examined under the accelerated procedures and were transferred to the regular procedure due to the applicant raising arguments that were complex and could not be examined within the 30-day timeframe as stipulated by the Law (usually either due to submitting a lot of evidence or there being a need for multiple interviews). In 2024, however, CyRC observed cases in which the applicant had indications of vulnerability and were not transferred to the regular procedure, such as an LGBTIQ+ person from Nigeria.²⁹⁷

5.2. Personal interview

Indicators: Accelerated Procedure: Personal Interview

☒ Same as regular procedure

1. Is a personal interview of the asylum applicant in most cases conducted in practice in the accelerated procedure? ☒ Yes ☐ No
 - ❖ If so, are questions limited to nationality, identity, travel route? ☐ Yes ☒ No
 - ❖ If so, are interpreters available in practice, for interviews? ☒ Yes ☐ No
2. Are interviews conducted through video conferencing? ☐ Frequently ☐ Rarely ☒ Never

As is the case during the regular procedure, interviews of applicants during the accelerated procedure are carried out by the Asylum Service and with the assistance of an interpreter where needed.²⁹⁸ In

²⁹² Article 12Δ(5)(β) Refugee Law.

²⁹³ EASO, *EASO Operational and Technical Assistance Plan to Cyprus 2020*, available at: <https://bit.ly/3W32gtU>.

²⁹⁴ Ministerial Decision on Safe Countries, available in Greek at: <https://bit.ly/3tyT40M>.

²⁹⁵ Information provided by Cyprus Refugee Council.

²⁹⁶ Information provided by Cyprus Asylum Service.

²⁹⁷ Ibid.

²⁹⁸ Article 12Δ(2) Refugee Law.

practice, and contrary to the regular procedure, in the beginning of interviews in the accelerated procedure, case workers inform applicants that their country has been designated a safe country of origin, on the basis of the Ministerial Decree of 202/2022. Applicants are then asked to explain if there are any reasons why they believe that in their individual case the safe country of origin presumption does not apply.²⁹⁹

According to the Law, when a decision is issued under the accelerated procedure, access to the report or to the transcript of the audio/visual recording of the interview, where applicable, is provided at the same time the decision is received.³⁰⁰ In practice, applicants are provided with a copy of the recommendation report of the Asylum Service but they are not provided with a copy of the interview transcript. The transcript can be received upon request for an inspection of the file at the Asylum Service or during the appeal procedure before the IPAC as is the case under the regular procedure.

5.3. Appeal

Indicators: Accelerated Procedure: Appeal

☐ Same as regular procedure

1. Does the law provide for an appeal against the decision in the accelerated procedure?

☒ Yes ☐ No

❖ If yes, is it:

☒ Judicial ☐ Administrative

❖ If yes, is it suspensive:

☐ Yes ☐ Some grounds ☒ No

An appeal can be submitted before the IPAC against a decision issued in the accelerated procedure and the time limit to appeal is 15 days³⁰¹ instead of 30 days as in the regular procedure (see [Regular Procedure: Appeal](#)).³⁰² In 2022, the IPAC initiated accelerated procedures for negative first-instance decisions issued on the basis of an inadmissible subsequent application³⁰³ and safe country of origin.³⁰⁴ Upon the submission of an appeal in such cases, the Asylum Service must, within 10 days, file a memorandum at the Registry of the IPAC, alongside the administrative file relating to the claim. The case is then scheduled directly for a hearing, during which the presence of the State Legal Service is not required, unless this is otherwise ordered by the IPAC. No written submissions by either the applicant or the Legal Service are envisaged in the accelerated procedure.³⁰⁵

Following the amendments to the Refugee Law in October 2020, the Asylum Service currently issues a single negative and returns decision. For cases examined under the regular procedure, a returns decision is automatically suspended once an appeal is submitted. However, for appeals relating to cases examined in the accelerated procedure and others, the appeal does not have automatic suspensive effect and a separate application must be submitted to the IPAC requesting the right to remain pending the examination of the appeal.³⁰⁶

The procedure to submit such an application was not provided for in the procedural rules, until their amendment in 2022. The amended Regulations provide that the application for the right to remain must be submitted at the same time as the appeal, and in any case within the deadline for the submission of the appeal, which is 15 days.³⁰⁷ It is not clear what the consequences of late submission would be and if

²⁹⁹ Based on cases monitored by the Cyprus Refugee Council.

³⁰⁰ Article 18 (2B)(γ).

³⁰¹ Article 12A IPAC Law.

³⁰² Article 11 IPAC Law.

³⁰³ Article 12Btetakis (2)(δ), Refugee Law.

³⁰⁴ Article 12Bτρίς, Refugee Law.

³⁰⁵ Add from IPAC regulations (Regulation 3(e)).

³⁰⁶ Article 8 (1A) Refugee Law.

³⁰⁷ Article 13 of the IPAC's amended Regulations (as amended in October 2022).

it would lead to automatic rejection of the application. The Court's procedural rules also now include the application form to be used for the right to remain which is an *ex parte* application.³⁰⁸ However, there is no information provision at the IPAC regarding the need to submit the right to remain application alongside the appeal and although the requirement to make such an application is included in the first-instance decision issued by the Asylum Service, applicants are not adequately informed. Furthermore, the form is not readily available at the counter of the Registry of the IPAC, although according to the Court it can be obtained following request by the applicants.³⁰⁹

As the accelerated procedure was initiated for the first time in late 2019, and not widely applied until late 2022, there is scarce information on the submission of appeals and their outcome under this procedure. Based on the appeals submitted so far that fall under the accelerated procedure, these are scheduled for a hearing within 1-2 months of the appeal submission, which is the same time as in the regular procedure. However, during the first hearing, the judges usually explain to the applicant that their case does not have merits and if pursued the decision will be issued with a cost order, in most cases approximately 500 EUR which the applicant is expected to pay. In the past, these orders were rarely pursued. However, in 2022, there were a few reports of asylum applicants wanting to withdraw their appeals and return to their country of origin being requested to pay the amount in order to withdraw the appeal. As a result, in many cases applicants withdraw their appeal. In cases where the appeal is not withdrawn a decision is issued soon after the first hearing.³¹⁰ In 2023, the IPAC reported 5,383 decisions on explicit withdrawals, concerning both regular and accelerated procedures. In 2024, the IPAC reported 2,403 decisions on explicit withdrawals, concerning both regular and accelerated procedures.³¹¹

5.4. Legal assistance

There is no access to free legal assistance from the State before the Asylum Service during any procedure, including the accelerated procedure. However, such cases can benefit from free legal assistance provided by NGOs under project funding, although the capacity of these projects is extremely limited (see [Regular Procedure: Legal Assistance](#)). For an appeal before the IPAC, an application for legal aid can be submitted, however, as mentioned above, the success rate of legal aid applications is generally low.

6. National protection statuses and return procedure

6.1. National forms of protection

The Cyprus Asylum Service was responsible for examining Humanitarian Status, which was a national form of protection, included in the Refugee Law, which provided similar rights as those afforded to asylum seekers.³¹² In 2014, the status was removed from the Refugee Law and since then the only available form of national protection is a form of humanitarian status under the article that transposed the Returns Directive, according to which 'The Council of Ministers may decide, at any time, to grant an autonomous residence permit or other permit granting a right to stay, on compassionate or humanitarian grounds, to a third-country national who remains illegally in the territory of the Republic.'³¹³

In practice, this protection is examined by the Migration Department, and upon approval of the Deputy Minister of Migration and International Protection, a "special residence permit" is issued and valid for 12 months, granting the right to remain. Such protection is not automatically reviewed by national authorities when they reject an asylum application and/or as they consider a return decision, in most cases applicants will have to apply on their own or with a lawyer or NGO at the Migration Department. However, in 2024,

³⁰⁸ Form no. 4 annexed to the IPAC Procedural Rules of 2019.

³⁰⁹ Information provided by Cyprus Refugee Council.

³¹⁰ Ibid.

³¹¹ Information provided by IPAC.

³¹² Article 19A, Refugee Law (since removed).

³¹³ Article 18OH(4). Aliens and Migration Law

cases were identified where the Cyprus Asylum Service upon rejecting an asylum application and not issuing a returns decision referred the case to the Migration Department for an assessment of such protection.

The status does not automatically afford rights; in some cases, access to the labour market may be included in the decision. However, such access is subject to the authorisation of the Labour Department under the procedure for employing third country nationals (TCN), which is a bureaucratic and often time-consuming procedure as it requires an employer that has a right to employ TCN to submit a contract in the name of the person. For cases that may have serious health issues, a request can be made to the Ministry of Health requesting access to health care on an exceptional basis.³¹⁴

Furthermore, the status is not to be renewed and, once the 12 months elapse, it is not clear what options are available for persons who may still have humanitarian reasons or whose return is not possible. In cases where the person is able to secure employment and contract authorised by the Labour Department, they may be able to obtain a work permit. In all other cases the persons remain undocumented after the 12 months have elapsed.

In 2024, 54 such status/permits were issued and, at the end of the year, 66 such status/permits were valid.³¹⁵

6.2. Return procedure

Following the amendments to the Refugee Law of October 2020, the Asylum Service currently issues a return decision together with a negative decision in a single administrative act. The Asylum Service also offers the applicant the option of voluntary return to their country of origin. If no response is received by the rejected applicant about voluntary return or request for assisted voluntary return, then the return decision is referred to the Aliens and Immigration Unit (AIU) who is in charge of execution of return decisions and deportation orders.

For cases examined under the regular procedure, a returns decision is automatically suspended once an appeal is submitted.³¹⁶ However, appeals relating to cases examined in the accelerated procedure, subsequent applications, decisions that determine the asylum application unfounded or inadmissible, and decisions related to explicit or implicit withdrawal, do not have automatic suspensive effect. In such cases, a separate application must be submitted to the IPAC requesting the right to remain pending the examination of the appeal (see section Regular Procedure: [Appeal](#)).

According to the Ministry of Interior in 2023, Cyprus ranked first among EU States for the highest percentage of returns of new asylum applicant applications and ranked 4th among the 27-member bloc in absolute numbers of returns and deportations of irregular migrants.³¹⁷ By the end of 2023, 9,193 people had left Cyprus.³¹⁸

In 2024, Cyprus returned 10,092 persons, voluntarily and involuntarily.³¹⁹ According to figures released by the Ministry of Interior and the Deputy Minister of Migration and International Protection, Cyprus has recorded the highest ratio of departures to arrivals among EU member states, with a rate of 179 per cent,

³¹⁴ Information provided by Cyprus Refugee Council.

³¹⁵ Information provided by Migration Department

³¹⁶ Article 8 (1A) Refugee Law.

³¹⁷ Cyprus Times, *Ministers: Cyprus ranks first in the EU in returning immigrants*, 30 November 2023, available in Greek at: <https://tinyurl.com/5cpurfjw>; Financial Mirror, *Cyprus ranked first in EU on returns*, 13 October 2023, available at: <https://bit.ly/48cO84B>; ECRE, *Weekly Bulletin of 20 October 2023*, available at: <https://bit.ly/48cEE9p>; PhileNews, *Cyprus returned more than 4,370 asylum applicants in 2023, says Interior Minister*, 6 July 2023, available in Greek at: <https://bit.ly/3TEI8yh>.

³¹⁸ Information provided by Civil Registry and Migration Department.

³¹⁹ Information provided by Migration Department

with a total of 10,941 people having left the country in 2024 (including people relocated).³²⁰ A voluntary return programme offering incentives between 1,000 and 1,500 euros contributed to 8,213 voluntary returns in 2024, compared to 4,636 in 2022.³²¹ The high number of returns has also been acknowledged by the EU Commission as “one of the success stories when it comes to stepping up on returns”.³²²

Regarding monitoring of returns, the Commissioner for Administration and the Protection of Human Rights/Ombudsman has the mandate to establish and operate an effective monitoring system for the return of irregular staying third-country nationals, which starts from the moment the forced-return procedure commences and ends with the departure of the third-country national from Cyprus and their readmission to their country of origin or to a country host or to another third-country to which they decide voluntarily to return and be accepted. The aim of the Mechanism is to monitor all stages of the forced-return operation undertaken by the competent migration authorities and to exercise effective control in order to ensure the implementation of common rules and procedures provided for in both the European and the National legislation as well as in the Codes of Contact published by Frontex.³²³ However, the Commissioner is not present during a significant number of forced-return procedures, most probably due to limited capacity. Additionally, in practice the Commissioner does not monitor voluntary returns.³²⁴

According to a joint investigation by the NGO Statewatch and the New Arab and UntoldMag news agencies, published in early 2025, the Ministry of the Interior has been “using coercion and deceit to pressure individuals into voluntary returns, at the expense of the country’s obligations under the European Convention of Human Rights”. The investigation into Cyprus’ Assisted Voluntary Return programme, which is “financially and operationally” supported by the EU to enable people who wish to return to their home countries in an “organised, safe and dignified manner”, found that the participation of a number of Syrians had not been based on their free and informed choices. The authors reported that Syrians had faced denial of access to asylum, unfounded accusations of serious crime, and unlawful detention in conditions “contrary to European values and international human rights law”, and that they had been pressured into sign voluntary return agreements “under the threat of forced deportation”. Furthermore, the investigation reports that, out of the €56.4 million the EC has paid to Cyprus under its Asylum, Migration and Integration Fund for the period 2021-2027, the Commission has allocated no money to monitor “voluntary” returns. Between May 2022 and September 2024, the EC provided Cyprus with €9.7 million for its voluntary returns program - 90% of the program’s budget. For that amount, Cyprus deported some 12,600 individuals as “assisted voluntary returns”. For the same period, the Commission allocated some €2 million for the forced returns of some 4,507 individuals from Cyprus. Only €121,547 was assigned by the EU to Cyprus’ Commissioner for the Protection of Human Rights to monitor forced deportations between July 2022 and December 2027.³²⁵

In 2023 the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) published two reports on Frontex-supported return operations from Belgium and Cyprus to the Democratic Republic of the Congo. Regarding Cyprus, the CPT highlighted the need for clear guidelines on the flight preparations and the boarding procedure, including on health-related issues. The Committee also became aware of allegations of ill-treatment after aborted removal attempts requiring the Cypriot authorities to take a proactive approach as regards the detection and prevention of ill-

³²⁰ Cyprus Mail, *Cyprus cuts asylum numbers as more migrants return home*, 5 February 2025, available [here](#).

³²¹ Philenews, *Government pays migrants €1000-€1500 to leave Cyprus, ministers say*, 5 February 2024, available [here](#).

³²² Cyprus Mail, *Cyprus is one of the ‘success stories’ when it comes to stepping up on returns, EU Commissioner Johansson says*, 14 March 2023, available [here](#).

³²³ Commissioner for Administration and the Protection of Human Rights (Ombudsman), *Forced Returns Monitoring Mechanism*, available [here](#).

³²⁴ Information provided by Cyprus Refugee Council.

³²⁵ Statewatch, *€1,500 and a one-way ticket: how Cyprus deports Syrian refugees with EU support*, 17 February 2025, available [here](#); ECRE, *CYPRUS: Government accused of coercing Syrians into ‘voluntary’ returns — Trial of prominent human rights defender postponed for fourth time — Hundreds of Syrians reportedly withdrawing asylum applications — Call for end to freeze on Syrians’ asylum applications*, 20 February 2025, available [here](#).

treatment. It also made recommendations aimed at improving safeguards in the context of the preparation for removal (e.g., access to a lawyer).³²⁶

D. Guarantees for vulnerable groups

1. Identification

Indicators: Identification

1. Is there a specific identification mechanism in place to systematically identify vulnerable asylum applicants? ☒ Yes ☐ For certain categories ☐ No
 ❖ If for certain categories, specify which:
2. Does the law provide for an identification mechanism for unaccompanied children? ☐ Yes ☒ No

The Refugee Law defines the categories of persons considered as vulnerable. These are similar to Article 21 of the recast Reception Conditions Directive:³²⁷

“[M]inors, unaccompanied minors, disabled people, elderly people, pregnant women, single parents with minor children, victims of human trafficking, persons with serious illnesses, persons with mental disorders and persons who have been subjected to torture, rape or other serious forms of psychological, physical or sexual violence, such as victims of female genital mutilation.”

1.1. Screening of vulnerability

The Refugee Law provides for an identification mechanism. An individual assessment is to be carried out to determine whether a person has special reception needs and/or requires special procedural guarantees, and the nature of those needs.³²⁸ These individualised assessments should be performed within a reasonable time period during the early stages of the asylum procedure. Furthermore, the requirement to address special reception needs and/or special procedural guarantees applies at any time such needs are identified or ascertained.

The Refugee Law also provides that any special reception/procedural needs of applicants, identified by any competent governmental authority upon exercising its duties, need to be reported to the Asylum Service. It also provides a basic overview of the procedure to be followed: the competent officer at the place where the claim of asylum is made fills out a special document indicating any special needs and the nature of such needs.³²⁹

Furthermore, the Refugee Law provides that during the preliminary medical tests, which are performed on all asylum applicants, a report is to be prepared by the examining doctor, a psychologist, or another expert, to indicate any special reception/procedural needs of the applicant and their nature. Furthermore, within a reasonable time period from the admission of a claimant in a reception centre and following personal interviews, the social workers and psychologists working in the facility are to prepare a relevant report to the Asylum Service indicating any special reception needs as well as their nature. Finally, the Social Welfare Services (SWS) are required to identify any special reception needs and to report them to

³²⁶ CoE CPT, Report to the Government of Belgium on the visit to Belgium carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 7 to 10 November 2022, 13 July 2023, available at: <https://bit.ly/3RwrAom>. See also, ECRE, Weekly Legal Update (EWLU) of 8 September 2023, available at: <https://bit.ly/3PFoVsZ>.

³²⁷ Article 9KΓ Refugee Law.

³²⁸ Articles 9KΔ(a) and 10A Refugee Law.

³²⁹ Article 9KΔ Refugee Law.

the Asylum Service, but this applies only in case an asylum applicant presents themselves to Social Services and “whenever this is possible”.³³⁰

The above provisions acknowledge the need for identifying and addressing in a timely manner the special reception and procedural needs of vulnerable persons and introduce a basic framework of operation, as noted also by EUAA in the 2021 operating plan.³³¹ However, further elaboration is required in order for an effective mechanism to be set up. In the absence of specific legislative or procedural guidelines, the identification and assessment of special reception and procedural needs has taken place inconsistently, while the assessment tools and approaches to be used were not defined nor standardised.³³² Specifically, there is no provision for training of the staff engaged in the identification and assessment procedure, and the role of Social Welfare and Health Services – the most competent State authorities in relation to evaluating the needs of vulnerable persons – is rather confined. No monitoring mechanism of the overall procedure is foreseen which could contribute to efficient and timely coordination among the involved agencies. The lack of effective measures for identifying vulnerable persons was raised in the 2019 review on Cyprus by the UN Committee against Torture, specifically the lack of procedures to identify, assess, and address the specific needs of asylum applicants, including survivors of torture.³³³

In an effort to address the issue in 2019, the Asylum Service started screenings of vulnerabilities at the First Reception Centre ‘**Pournara**’. However, these were not full assessments, and the results indicated that cases were going unidentified. From March 2019 onwards, the Cyprus Refugee Council carried out vulnerability assessments at the Centre using relevant UNHCR tools and, through this process, identified and referred to the responsible authorities a significant number of vulnerable persons, which confirmed the need for an identification and assessment mechanism. From mid-2019 onwards, efforts were initiated by the Asylum Service and the EUAA, in collaboration with UNHCR and the Cyprus Refugee Council, to set up a comprehensive vulnerability assessment procedure at **Pournara** where the registration of the vast majority of asylum applicants takes place. This has included the development of a common tool for screening and assessment of vulnerable persons, a Standard Operating Procedure, and a team of vulnerability examiners to carry out the assessments. Vulnerability examiners receive training under relevant EUAA modules, however at times there has been insufficient supervision and coordination of the team as well as high turnover of staff.

In 2022, the vulnerability assessment team comprised of 10 vulnerability officers: 5 officers from EUAA; 3 officers from CODECA (the organization contracted to manage Pournara); 1 officer from UNHCR; 1 officer from CyRC and a coordinator appointed by EUAA. As in previous years, there was still a lack of a comprehensive SoPs and referral pathways and results in vulnerability assessments, and referrals were often carried out in a non-uniform manner. Furthermore, there was no system in place for quality control of the vulnerability assessments to ensure the efficacy of the findings and referrals. In addition, there continued to be a high turnover among vulnerability officers, however an improvement has been noted in the training and guidance offered to newly recruited/assigned staff. In an effort to address the above mentioned, the vulnerability team conducts meetings (approximately once or twice per month) to discuss guidelines on identifying vulnerabilities, guidelines on interviewing (i.e., families; single parents with minor children), as well as to discuss other issues that arise, including challenging cases identified. Furthermore, a training seminar on Trafficking in Human Beings was organised by EUAA for all vulnerability officers. EUAA is currently designing SoP for vulnerability assessments with clear instructions on procedures, vulnerability indicators, and instructions for identification.

In 2022, 2,800 persons were identified as vulnerable during the registration of their asylum application.³³⁴

³³⁰ Ibid.

³³¹ EASO, *EASO Operating plan 2021*, available at: <https://bit.ly/4avqnG9>.

³³² Information provided by Cyprus Refugee Council

³³³ UN CAT, *Concluding Observations on the Fifth Periodic Report of Cyprus*, December 2019, available at: <https://bit.ly/49EGAYh>.

³³⁴ Cyprus Asylum Service.

In early 2023, the EUAA in collaboration with the Asylum Service finalised the SoPs for the identification of vulnerable persons in Pournara. According to the new procedure, a flagging (screening) system has been introduced to prioritise individuals with vulnerabilities. Specifically, upon entry and registration, all individuals receive a short interview by EUAA officers. The interview includes questions regarding personal data and information about relatives in the EU for the Dublin procedure. Furthermore, persons are requested to briefly state the reasons they left their country and based on their response they may be flagged as vulnerable. Only individuals that fall into the following categories are flagged: women, single parents (both men and women), victims of human trafficking, accompanied minors, unaccompanied minors, applicants who are survivors of rape and sexual violence, applicants who are survivors of psychological or physical violence, applicants who are survivors of shipwreck, applicants who are victims of torture, applicants who are elderly (65+), applicants with incurable serious diseases, applicants with mental illnesses, applicants with physical disabilities, women with new-borns, and pregnant women.

Only persons who are flagged as vulnerable will then undergo a vulnerability assessment by the vulnerability assessment team. In 2023, the UN Human Rights Committee raised concerns that not all asylum-seekers at Pournara reception centre undergo a vulnerability assessment and recommended that measures are strengthened to ensure early identification, referral, assistance and support for all vulnerable asylum-seekers, including by establishing a formal and comprehensive procedure for identifying, assessing and addressing the specific needs of vulnerable asylum-seekers.³³⁵

For the first half of 2023 the vulnerability assessment team comprised of 6 vulnerability officers: 4 from EUAA; 1 officer from UNHCR; 1 officer from CyRC, and a coordinator appointed by EUAA. In the second half of 2023, the members of the vulnerability assessment team from EUAA were reduced to 3 officers. In 2024,

In 2023, a total of 3,839 vulnerability assessments were carried out in Pournara during the registration of their asylum application and 2,706 persons were identified as vulnerable. In 2024, a total of 2,654 vulnerability assessments were carried out in Pournara during the registration of their asylum application and 2,309 persons were identified as vulnerable.³³⁶

The EUAA supports and coordinates vulnerability assessments in Pournara reception centre. In this context, during 2024, 2,561 persons were identified as presenting vulnerability indicators.³³⁷

The new procedure also includes a referral procedure when special procedural and/or reception needs are identified. For this purpose, a new Referral Form has been introduced that is attached to the vulnerability assessment Form. This is to be completed when the vulnerability officer identifies such needs and can include procedural guarantees such as prioritization of an asylum interview or specific interpretation needs, specific reception needs (accommodation, disability mobility assistance) and other needs such as medical or psychological support. The time needed for the action is also indicated (*i.e.*, urgent, medium urgency, etc).

In practice, however, significant gaps remain to address the identified needs and often persons are identified as vulnerable but do not necessarily receive the required support, whether special reception conditions and/or procedural guarantees. In May 2023, the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) visited Pournara. The CPT found that the quality of certain initial assessments, such as the vulnerability assessment procedures, were of a good standard, despite the impact of delays in receiving the results. Nevertheless, once identified as vulnerable, rather than being placed in “safe zones”, these persons were still subject to the substandard

³³⁵ UN, CCPR Human Rights Committee, Concluding observations on the fifth periodic report of Cyprus, September 2023, available here

³³⁶ Information provided by Cyprus Asylum Service.

³³⁷ Information provided by the EUAA, 14 March 2025.

living conditions and poor general regime while very few protective safeguards were afforded and there was no apparent follow-through and regular check-up on those persons found to be vulnerable.³³⁸

The main - and often only - support received is temporary accommodation and emergency financial allowances upon exiting **Pournara** by the Social Welfare Services. However, even this is not always provided, and in many cases, vulnerable individuals are released from Pournara without being assisted by an officer of the Social Welfare Services stationed at the centre. The lack of an effective referral system combined with the serious gaps in the reception system and in the provision of material reception conditions leave many vulnerable persons in extremely dire situations (see section [Reception Conditions](#)).³³⁹

Regarding, access to mental health services, particularly psychological assistance, is also problematic, as there is no system to refer cases to State psychologists and the capacity of such services is often not sufficient to respond to the needs and lack interpretation services. Furthermore, there are very few NGOs offering such services, and they cannot respond to the demand. In cases of severe mental health difficulties or emergency needs, e.g., risks or attempts of suicide, the person is referred to a psychiatrist at the Emergency department of the General Hospital.

Concerning potential victims of trafficking, due to lack of training and expertise among staff, it had been noted that a very low number of cases were identified and referred. From mid-2021 onwards and following trainings on human trafficking offered by EUAA to the vulnerability assessment team the number of referrals to the National Trafficking Mechanism have increased. The referred potential victims are interviewed by an officer of the Social Welfare Services, are informed of their rights and offered assistance, usually similar to other groups of vulnerable individuals (accommodation and emergency financial allowance). The referral forms are then forwarded to the Anti-trafficking Unit of the Police for the examination of the trafficking claims. A person should be identified as a possible VoT and referred to be examined and assessed by the Police regardless of the prospect of investigation and prosecution. However, in practice during the assessment procedure carried out by the Police, the prospect of investigation and prosecution does impact the chances of being recognised as a VoT, especially since in many cases exploitation took place in the areas not under the control of the RoC and Police cannot carry out investigations.³⁴⁰

In 2024, 83 persons were identified as potential victims of trafficking during the vulnerability assessment procedure in Pournara, compared to 133 in 2023.³⁴¹

In 2024, the IPAC annulled an Asylum Service decision to reject international protection to a Cameroonian woman as it found substantial procedural shortcomings in the investigation of the possibility that the applicant is a victim of human trafficking. The IPAC noted that upon registration of the application for asylum, a vulnerability assessment had been carried out, however, the competent officer had not asked any questions regarding the circumstances of her trip to Cyprus and her stay in the areas not controlled by Cyprus. The IPAC highlighted in this respect that the profile of the applicant as a woman who travelled alone, originating from Cameroon – a country known for high rates of trafficking – as well as her prolonged stay in areas not controlled by the Republic were sufficient indicators to investigate whether the applicant was subjected to trafficking in human beings. The judge annulled the decision of the Asylum Service and ordered the following actions: To take the necessary steps to examine, through the competent authorities,

³³⁸ CPT, *Report to the Government of Cyprus on the visit to Cyprus carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 9 to 17 May 2023*, available [here](#).

³³⁹ Information provided by Cyprus Refugee Council.

³⁴⁰ Ibid.

³⁴¹ Information provided by Cyprus Asylum Service.

the possibility that the applicant was a victim of trafficking in persons. To evaluate, through the appropriate channel, the psychiatric/psychological condition of the applicant. To examine the necessity of conducting a new substantive interview, after receiving the conclusions of the above-mentioned experts and after providing the appropriate procedural guarantees.³⁴²

Regarding procedural guarantees even when cases are identified that justify prioritization this is not always possible due to the extremely high backlog. Furthermore, the lack of access to psychological or legal support often affects the ability of vulnerable persons, such as victims of torture or violence, to present their case adequately. However, the increase in referrals of such cases to the team of examiners with the necessary training is a positive development and the increase of examiners in Pournara has led to some cases of vulnerable persons exiting Pournara as BIPs.³⁴³

Overall identification of vulnerabilities and needs has improved significantly however the response to the identified needs remains a serious gap.

1.2. Age assessment of unaccompanied children

Under the Refugee Law, the Asylum Service may use medical examinations to determine the age of an unaccompanied child, in the context of the examination of the asylum application when, following general statements or other relevant evidence, there are doubts about the age of the applicant.³⁴⁴ If, after conducting the medical examination, there are still doubts about the age of the applicant, then the applicant is considered to be minor. Furthermore, the law provides that any medical examination shall be performed in full respect of the child's dignity, carried out by selecting the least invasive examinations, and by trained professionals in the health sector so as to achieve the most reliable results possible.

The Asylum Service also has the obligation to ensure that unaccompanied children are informed prior to the examination of the application, in a language which they understand or are reasonably supposed to understand, about the possibility of age determination by medical examinations. This should include information on the method of examination, the potential impact of the results on the examination of their application, and the impact of any refusal of an unaccompanied child to undergo medical examinations. Furthermore, the Asylum Service must ensure that the unaccompanied child and/or representatives have consented to the carrying out of examinations to determine the age of the child. Lastly, the decision rejecting an asylum application of an unaccompanied child who has refused to undergo such medical examinations shall not be based solely on that refusal.³⁴⁵

In 2023, an amendment was made to the Refugee Law and a provision was added according to which in the event of the applicant's refusal to consent to an examination, the person in question shall be presumed to be an adult. At any subsequent stage, the applicant shall have the right to submit additional evidence as to their age and/or to request a medical examination to determine their age, which the Asylum Service must examine.³⁴⁶ The provision is intended to address possible abuse of the system where adult applicants may falsely be claiming to be minors, however concerns were raised by the Commissioner for the Rights of the Child, UNHCR, and national NGOs on the necessity of the provision and whether it is in line with EU and International Law and standards.³⁴⁷

³⁴² IPAC, F.E.A. v. RoC via Asylum Service, No. Application: 6696/2021, available [here](#).

³⁴³ Ibid.

³⁴⁴ Article 10(1Z)(a) Refugee Law.

³⁴⁵ Article 10(1H) Refugee Law.

³⁴⁶ Ibid.

³⁴⁷ Reporter, *Parliament voted in favor of a law that attempts to deal with the abuse of the protection system for unaccompanied children who request international protection by adults*, 13 July 2023, available in Greek at: <https://tinyurl.com/43559msb>.

In practice, not all unaccompanied children are sent for an age assessment. In 2024, of the applications submitted by UASC, 191 were referred for an age assessment³⁴⁸ which is an increase from 2022 and 2023, however it is not clear whether this is a result of the above-mentioned amendment to the Law. Those for whom there are doubts will first have an interview, considered by the authorities as a psychosocial assessment, to determine if they should be sent for medical examinations. The psychosocial assessment is carried out by an Asylum Service caseworker, in the presence of a social worker/guardian and it mostly consists of taking down facts to assess whether these are consistent with the claim of being underage. The caseworker carrying out the assessment must have received training for this purpose but is not necessarily a qualified social worker or psychologist. The assessment also includes questions related to the asylum application.³⁴⁹ In Dublin cases, a child may be sent for medical examination when the country to which they are to transfer requires a medical age assessment as part of the examination of the Dublin request. The medical examination is comprised of a wrist X-ray, a jaw-line X-ray, and a dental examination. A clinical examination by an endocrinologist to determine the stage of development, upon consent of the child, is also mentioned in the procedure. However, in practice such an examination is not used due to the invasive nature.³⁵⁰

Doctors carrying out the dental examinations have been trained by the EUAA. However, the training of all professionals carrying out age assessments does not seem to be ongoing and it is not clear if any of the doctors have since changed or if there has been further training.³⁵¹

Furthermore, a decision finding an asylum applicant to be an adult cannot be challenged administratively or judicially in itself but can only be challenged judicially when the asylum claim is rejected and as part of the appeal challenging the negative decision of the asylum application. Due to this, the Asylum Service does not provide access to the file and documents relevant to the age assessment until and in case of an appeal. Where results confirm the individual to be an adult and these results are communicated orally to the applicant, they are usually assisted in applying for material reception conditions and asked to leave the shelter for children as soon as possible.³⁵² In 2024, a Supreme Court decision confirmed that the age determination procedure and its result of classifying an asylum applicant as an adult is not in itself an administrative decision that can be challenged in court. Instead, the Supreme Court stated that the age determination procedure is an interim and preparatory decision that is part of the asylum application examination procedure and as such can be challenged along with the decision concerning the asylum claim of the applicant.³⁵³

The Commissioner of Children's Rights issued an updated report on age assessment of unaccompanied children at the end of 2018,³⁵⁴ in which she stated that the procedure that had been adopted from 2014 onwards was a positive development.³⁵⁵ However, she noted important gaps that still remain, such as: the lack of an overall multidisciplinary approach to the procedure and the decision, especially noting the gaps in the psychosocial aspect of these; the absence of best interest determinations when deciding to initiate the age assessment procedure; the lack of remedy to challenge the decision that determines the age; issues relating to the role of the guardian and the representative in the age assessment procedures; and the conflict of interest that arises as both roles are carried out by the same authority. Attention was also paid to the lack of independence of both of these roles as they act on behalf of the national authority

³⁴⁸ Information provided by Asylum Service.

³⁴⁹ Information provided by Cyprus Refugee Council.

³⁵⁰ Commissioner of Children's Rights, *Έκθεση της Επιτροπής Προστασίας των Δικαιωμάτων του Παιδιού, Λήδας Κουρσουμπά, αναφορικά με την εκτίμηση της ηλικίας των ασυνόδευτων ανηλίκων αιτητών ασύλου*, December 2018, available in Greek at: <https://bit.ly/2U2P7hW>, pp. 18 and 32.

³⁵¹ Ibid., p. 29.

³⁵² Information provided by Cyprus Refugee Council.

³⁵³ Supreme Court, *Republic of Cyprus through the Asylum Service v. Said Abdulle*, Appeal against the IPAC decision, Application No.40/2022, 20 December 2024.

³⁵⁴ Ibid.

³⁵⁵ Commissioner of Children's Rights, *Position Paper on the first-stage handling of cases of unaccompanied minors, The results of the investigation of complaints, consultation with NGOs and interviews with unaccompanied minors*, November 2014, available in Greek at: <https://tinyurl.com/3t7rktxf>.

they represent. Since the Commissioner's report, no improvements have been noted and the issues raised by the the latter remain concerning.

In 2024, the UN Economic and Social Council recommended that the RoC continues its efforts to ensure that an age assessment is undertaken only in case of serious doubt about the age of the person concerned.³⁵⁶

In 2021, the IPAC issued a decision concerning an appeal submitted by a Somali national in 2016 against the first instance rejection of their asylum application. The judge concluded that the age assessment procedure was erroneous and that the principle of the best interest of the child had been violated due to the fact that the age assessment had been initiated by the applicant's guardian, who by law is supposed to act on the best interest of the child; the age assessment was conducted without giving the applicant the right to a hearing instead medical exams were opted for; the medical report indicating that the applicant was likely an adult contained an element of doubt as to its accuracy. Thus, the age assessment decision was void, illegal and lacking any legal basis. As a result, the procedures that followed, namely processing of the application for international protection of the applicant under the consideration that he is an adult lacked any legal basis and was cancelled.³⁵⁷

In 2022, another decision was issued by the IPAC related to the age assessment procedure, where the Court annulled a decision of the Asylum Service due to deficiencies identified in the age assessment procedure and failures to observe required safeguards and the best interest of the child.³⁵⁸ Specifically, the Court referred to the CJEU judgement *A. and S. v Secretary of State for Security and Justice* (Staatssecretaris van Veiligheid en Justitie) and explained that the date of filing the application for international protection is the one decisive in order to assess the refugee's age with regard to the application of the family reunification procedure, and the authorities should have referred to the applicant's age at the time of submitting/filing his application and not at the time of the medical examinations. Consequently, according to the minimum assessment limit of the method in question, the applicant may have been a minor at the time of the submission of his asylum application and the doubt has to be in favour of the minor, according to the Refugee Law. Based on these considerations and the deficiencies identified, the Court annulled the contested decision of the Asylum Service.

Unaccompanied asylum-applicants children in Cyprus: 2019-2024					
	2020	2021	2022	2023	2024
Applied for asylum	308	659	941	957	656
Referred for age assessment	66	59	109	188	191
Referred for medical examinations	55	40	71	128	140
Found to be adults	43	33	30	94	91

Source: 2020, 2021 Social Welfare Services; 2022, 2023, 2024 Asylum Service.

³⁵⁶ UN Committee on Economic, Social and Cultural Rights, Concluding observations on the seventh periodic report of Cyprus, October 2024, available [here](#).

³⁵⁷ IPAC Case no. 601/2016, Y.D.M.O v. Asylum Service, Decision issued 31 December 2021.
IPAC Case no. 1475/2022, C.M. v. Asylum Service, Decision issued 9 December 2024.

³⁵⁸ IPAC, Case No 698/19, S.A. v Republic of Cyprus, through the Asylum Service Decision issued 7 July 2022.

In 2022, 109 UASC were referred for age assessment, out of which 71 UASC were further referred for medical examinations as part of the age assessment. Of the 71 UASC, 16 were found to be minors, 30 were found to be adults, 22 refused to sign consent to undergo the medical examinations, 1 admitted to being over 18 and 2 are pending results.³⁵⁹

In 2023, 188 UASC were referred for age assessment, out of which 128 UASC were further referred for medical examinations as part of the age assessment. Of the 128 UASC, 27 were found to be minors, 94 were found to be adults, 6 refused to sign consent to undergo the medical examinations, and 1 withdrew their application.³⁶⁰

In 2024, 191 UASC were referred for age assessment, out of which 140 UASC were further referred for medical examinations as part of the age assessment. Of these 140 UASC, 48 were found to be minors, 91 were found to be adults.³⁶¹

2. Special procedural guarantees

Indicators: Special Procedural Guarantees

1. Are there special procedural arrangements/guarantees for vulnerable people?

☒ Yes

☐ For certain categories

☐ No

❖ If for certain categories, specify which:

2.1. Adequate support during the interview

The Refugee Law lays down procedural guarantees and provides that if the Asylum Service finds that an applicant is in need of special procedural guarantees, they are provided with adequate support, including sufficient time, so that the applicant can benefit from their rights and comply with the obligations provided for in the Refugee Law throughout the asylum procedures and to make it possible to highlight the elements needed to substantiate the asylum application.³⁶² The exact level, type, or kind of support is not specified in the law. No other procedural guarantees are provided in the law or administrative guidelines, or in practice, to accommodate the specific needs of such asylum applicants.

In recent years, improvements have been noted in the examination of cases of vulnerable persons including the personal interviews. The Asylum Service has set up a specialised unit for vulnerable persons and children. In 2023, it consisted of 7 caseworkers for vulnerable persons, 2 of which were placed in Pournara, and 6 caseworkers for unaccompanied children. In 2024, it consisted of 5 caseworkers for vulnerable persons, and 5 caseworkers for unaccompanied children.³⁶³

In practice, cases of persons identified as vulnerable (see: [Identification](#)) will be allocated to an examiner trained to deal with vulnerable cases and, in most cases, the applicant will receive an appropriate interview. However, even in such cases, there is not a set procedure or guidance wherein the examiner can request that the applicant receives support, such as medical or psychological support, in order to facilitate the interview and ensure the applicant is in a position to provide the elements needed to substantiate their claim.

In 2024, the IPAC noted that although the applicant underlined that she was a victim of sexual violence and there were serious indications of vulnerability and PTSD in her file, the authority proceeded to carry out the interview without obtaining an expert medical report on the state of her health or applying any procedural guarantee. Also, the authority did not wait for the medical results before drafting the decision

³⁵⁹ Cyprus Asylum Service.

³⁶⁰ Ibid.

³⁶¹ Ibid.

³⁶² Article 10A Refugee Law.

³⁶³ Information provided by the Cyprus Asylum Service.

so that any findings thereof would be duly considered while assessing the application. As a result, the procedure lacked due investigation regarding the profile of the applicant and her potential vulnerability. Moreover, the entire procedure was devoid of all due procedural guarantees since the statutorily-mandated procedure to examine the possibility of granting these guarantees was not followed.³⁶⁴

Furthermore, still in 2024, cases continued being observed in which applicants were not identified as vulnerable either because many applicants do not undergo vulnerability assessments or because their vulnerability appeared after registration, *i.e.*, when vulnerability assessments are carried out.

In such cases, an interview will most probably be carried out by an officer/caseworker who lacks the necessary training, unless a legal representative of the applicant communicates the issue to the Asylum Service. Moreover, specific interview techniques are not systematically used, and practice still depends on individual officers/caseworkers conducting interviews. Due to the lack of a quality control mechanism, similar cases are often examined in a different manner resulting in different outcomes, such as LGBTIQ cases and cases of torture and trafficking. As there is no internal procedure to refer cases, an examiner without the necessary training and expertise will often continue with the interview and examination of the application. In view of the lack of a complaints mechanism in the Asylum Service, applicants have no recourse to address issues such as caseworkers failing to take into consideration their vulnerabilities or sensitivities; not being impartial; carrying out the interview in an interrogatory manner or having a problematic attitude.³⁶⁵

If requested, usually in writing, a social advisor or psychologist can escort a vulnerable person to the interview. However, due to the low capacity of available services, this is not utilised very often. Based on cases represented by CyRC, when such a request is made it is granted, but capacity only allows for 2-3 cases per year. The role of the social advisor or psychologist during the interview is to provide support for the applicant. They do not intervene in the interview.

2.2. Exemption from special procedures

The Refugee Law also provides that where such adequate support cannot be provided within the framework of the [Accelerated Procedure](#), in particular where it is considered that the applicant is in need of special procedural guarantees as a result of torture, rape, or other serious forms of psychological, physical or sexual violence, the Head of the Asylum Service shall not apply, or shall cease to apply, the accelerated procedure.³⁶⁶

Asylum applications submitted by vulnerable groups of asylum applicants such as victims of torture, severe forms of violence and unaccompanied children follow the regular examination procedure.

In practice the use of the accelerated procedure was only initiated toward the end of 2019 with limited use until late 2022.³⁶⁷ Cases have been identified that were initially being examined under the accelerated procedures and were transferred to the regular procedure due to the applicant raising arguments that are complex and cannot be examined within the 30-day timeframe as stipulated by the Law (usually either due to submitting a lot of evidence or there being a need for multiple interviews).³⁶⁸ There is no data available on the number of cases that may have started out in the accelerated procedure and have been moved to the regular procedure.

³⁶⁴ Applicant v Republic of Cyprus through the Asylum Service (Κυπριακή Δημοκρατία και/ή μέσω Υπηρεσίας Ασύλου), Application No 595/2022, 30 September 2024, available in Greek [here](#) and an EUAA summary in English [here](#).

³⁶⁵ Information based on cases represented by the Cyprus Refugee Council.

³⁶⁶ Article 10A(3)(a).

³⁶⁷ Based on cases reviewed by the Cyprus Refugee Council.

³⁶⁸ Information provided by Cyprus Refugee Council.

3. Use of medical reports

Indicators: Use of Medical Reports

1. Does the law provide for the possibility of a medical report in support of the applicant's statements regarding past persecution or serious harm? ☐ Yes ☒ In some cases ☐ No
2. Are medical reports taken into account when assessing the credibility of the applicant's statements? ☒ Yes ☐ No

The Refugee Law contains a number of provisions related to medical reports, which should be taken into consideration when assessing credibility of statements, as well as past persecution or serious harm. First, asylum applications are examined and decisions are taken individually, objectively and impartially taking into account, among other things, the relevant statements and documents submitted by the applicant including information on whether the applicant has been or may be subject to persecution or serious harm.³⁶⁹ Such documents would, for example, include medical reports.

Other instances where the law refers to medical reports and how they should be taken into account for the assessment of credibility as well as past persecution or serious harm are the following:

- ❖ As part of the initial medical examination of all applicants, the examining physician, psychologist or other specialist prepares a report on the existence of any special reception needs and / or special procedural guarantees of the applicant and the nature of those needs;³⁷⁰
- ❖ The personal interview may be omitted if the Asylum Service is of the opinion that the applicant is unfit or unable to be interviewed owing to enduring circumstances beyond his control. When in doubt, the Asylum Service shall consult a medical professional to establish whether the condition that makes the applicant unfit or unable to be interviewed is of a temporary or enduring nature;³⁷¹
- ❖ Where the examining officer considers it relevant for the evaluation of the application they shall, subject to the applicant's consent, arrange for a medical examination of the applicant concerning signs that might indicate past persecution or serious harm, as well as symptoms and signs of torture or other serious acts of physical or psychological violence, including acts of sexual violence. The results of the medical examinations shall be assessed by the determining authority along with the other elements of the application;³⁷²
- ❖ The personnel examining applications and taking decisions have the possibility to seek advice, whenever necessary, from experts on particular issues, such as medical, cultural, religious, child-related or gender issues.³⁷³

However, all of the above may not be applied in practice. Overall, there are inconsistencies in the way each officer/caseworker interprets medical reports and the way these are evaluated. Specifically, medical reports provided by private doctors in Cyprus or from the country of origin of the asylum applicant are often viewed as not credible and not taken into consideration by certain officers/caseworkers, whereas others may evaluate them and include them in the assessment. In addition, the costs for reports from private doctors are borne by the applicant. Medical reports from public hospital doctors are usually considered to be more credible, but there are still discrepancies as to how such reports are assessed. Currently there are no NGOs providing medical reports.³⁷⁴ The only available NGO report is the one that may be provided under the specialised services for victims of torture, trafficking, and gender-based violence implemented by the Cyprus Refugee Council,³⁷⁵ which is a psychological report that may be drafted as part of the rehabilitation services offered to victims of torture.

³⁶⁹ Article 18(3) Refugee Law.

³⁷⁰ Article 9KΔ(3)(b) Refugee Law.

³⁷¹ Article 13A(2)(b) Refugee Law.

³⁷² Article 15 Refugee Law.

³⁷³ Article 18(7A)(b)(ii) Refugee Law.

³⁷⁴ Information provided by Cyprus Refugee Council.

³⁷⁵ For more information, see Cyprus Refugee Council, *Our projects*, available at: <https://bit.ly/2DV3s9c>.

Victims of torture or violence

The law provides that: 'Where the examining officer considers it relevant for the evaluation of the application, the officer shall, subject to the applicant's consent, arrange for a medical examination of the applicant concerning signs that might indicate past persecution or serious harm, as well as symptoms and signs of torture or other serious acts of physical or psychological violence, including acts of sexual violence. The results of the medical examination shall be assessed by the determining authority along with the other elements of the application'.³⁷⁶

For this purpose, a State Medical Board was established to evaluate torture claims within the asylum procedure. In the past, the operation of this Board has been problematic, to the point where the UN Committee Against Torture highlighted the issue.³⁷⁷ Action was taken by the authorities and in early 2017, the Ministry of Health in collaboration with EUAA and the International Rehabilitation Council for Torture Victims (IRCT) organised trainings for all professionals that are part of the procedure, including a psychological assessment. The procedure followed after these trainings was closer to the training received and to that described under the Istanbul Protocol.

In late 2019 and throughout 2020, the procedure before the Medical Board came to a complete halt in view of the new national health system (GESY); many state doctors resigned to take up private practices, including doctors who were trained and part of the Medical Board. As a result, it did not operate for most of 2020. In 2021 and 2022, according to the Asylum Service, the Board resumed operation and referrals were sent. However, there is no information on the doctors on the Board and whether they have been adequately trained. Furthermore, no decisions have been identified to indicate the duration of examination or the recommendations being made. The situation remained the same throughout 2023 and 2024.

The UN Committee against Torture in the latest report on Cyprus in December 2019 expressed concern about 'the lack of procedural safeguards to ensure a timely medical examination of alleged victims of torture and ill-treatment, including psychological or psychiatric assessments when signs of torture or trauma are detected during personal interviews of asylum applicants or irregular migrants'.³⁷⁸

Referrals to the Medical Board are at the discretion of the examining officer. It has been observed in recent years that practice varies. Caseworkers of the Asylum Service, if they have no doubt as to the credibility of the applicant, will grant protection without referring to the Medical Board in many cases and tend to refer only cases that are considered to require further examination/evaluation. On the other hand, EUAA caseworkers examining asylum applications under the support plan seem to be more reluctant to refer applicants to the Medical Board.³⁷⁹ Between 2018 and 2024, EUAA caseworkers identified and examined various cases in which the applicant alleged that they had been subjected to torture; the applicant was not referred to the Medical Board and their application was rejected. In certain cases, the torture claim was found to be credible, however they were found to be not credible on the reasons for which the torture took place or that there was no risk of the torture happening again.³⁸⁰

When an asylum applicant is referred to the Medical Board, the Board plans the appointment, in most cases several months after the referral has been made by the Asylum Service. Considering that the initial interview leading to the referral is usually conducted on average two years after the submission of the asylum application, this leads to a considerably delayed medical examination of victims of torture, which will inevitably affect the Board's findings. Throughout 2018 and 2019 most cases took between 12-18 months before the Medical Board alone. From then on, they require at least another year before the

³⁷⁶ Article 15 Refugee Law.

³⁷⁷ UNCAT, *Concluding Observations on the Fourth Periodic Report of Cyprus*, 30 April 2015, available at: <https://tinyurl.com/k8uku5cu>.

³⁷⁸ UNCAT, *Concluding Observations on the Fifth Periodic Report of Cyprus*, December 2019, available at: <https://tinyurl.com/3jcjevns>

³⁷⁹ Based on information from cases represented by the Cyprus Refugee Council.

³⁸⁰ Ibid.

Asylum Service issues a first instance decision on the asylum claim. In 2022, and 2023 there were no cases to indicate the current trends. In 2024, the Cyprus Asylum Service confirmed that the Medical Board is operating, and 4 cases were referred and are still pending.³⁸¹

There have not been enough cases and reports to assess the quality of the reports issued and their impact on the asylum assessment. A medical report reviewed at the end of 2018 in a case represented by the Cyprus Refugee Council noted physical findings (scars) and that the applicant had symptoms indicating PTSD, indicating that a psychological assessment is now carried out. Furthermore, the report actually concluded that the findings could be the result of torture, also an improvement from the former practice. However, in the subsequent decision on the asylum application issued by the Asylum Service based on a recommendation by an EUAA caseworker, although the applicant was found to be credible on the injuries sustained, noting that the medical report confirmed these; the applicant was found to be not credible regarding the reasons for which the attack took place. As for the PTSD, the decision stated that it was taken into consideration but that it could not excuse the non-satisfactory internal credibility of the applicant's statements and the application was rejected.³⁸²

In 2023, a case was brought before the IPAC where the applicant had claimed being subjected to violence but was not referred for medical examination during the first instance examination of the application by the Asylum Service. The judge proceeded to make a referral to a psychologist for assessment of the claim of violence so that they could carry out an *ex nunc* examination of the case.³⁸³ However, the legal representative of the state submitted an application/certiorari before the Supreme Court, which led to the referral being quashed as the Supreme Court decided that the IPAC had acted beyond its jurisdiction.³⁸⁴ The Supreme Court decision was appealed before the second instance procedure of the Supreme Court, which upheld the first instance decision confirming that the IPAC does not have such jurisdiction.³⁸⁵ Following these decisions, the IPAC does not have the jurisdiction to refer applicants for medical examinations but is obliged to annul the first instance decision and order a review by the Asylum Service.

The IPAC proceeded to submit a request for a preliminary ruling under Article 267 on whether the IPAC has the power to order a medical examination. In April 2025 the European Court of Justice ruled that in order to satisfy the requirement of a full and *ex nunc* examination, a national court of first instance hearing an action against a decision of the determining authority refusing to grant an application for international protection must have the power to order a medical examination of the applicant for international protection, where it takes the view that the use of that examination is necessary or relevant for the purposes of assessing that application.³⁸⁶

4. Legal representation of unaccompanied children

Indicators: Unaccompanied Children

1. Does the law provide for the appointment of a representative to all unaccompanied children?

☒ Yes

☐ No

According to the law, when an application for asylum is lodged by an unaccompanied child, the AIU must immediately notify the Head of the Asylum Service, who must subsequently notify the Director of Social Welfare Services.³⁸⁷ With the establishment of **Pournara**, persons who have recently arrived in the areas under the effective control of the RoC in an irregular manner are referred to the Centre for registration,

³⁸¹ Information provided by Cyprus Asylum Service.

³⁸² Information provided from the Cyprus Refugee Council.

³⁸³ Ibid.

³⁸⁴ Supreme Court, First Instance Jurisdiction, Application No. 31/2023, 7 April 2023, available in Greek at: <https://tinyurl.com/dxfu4cyp>.

³⁸⁵ Supreme Court, Second Instance Jurisdiction, Application No. 30/2023, 15 May 2023, available in Greek at: <https://tinyurl.com/jaybc6cj>.

³⁸⁶ CJEU, Case C-283/24, *Barouk*, judgment of 3 April 2025, available [here](#).

³⁸⁷ Article 10 Refugee Law.

including unaccompanied children. At the time of registration anyone claiming to be under 18 years old will be treated as such.

The law provides that the Director of Social Welfare Services acts, either in person or via an officer of the Social Welfare Services, as a representative for unaccompanied children in the procedures provided in the Refugee Law. For judicial proceedings, the Social Welfare Services ensures the representation of unaccompanied children pursuant to the Commissioner for the Protection of Children's Rights Procedural Rules of 2014.³⁸⁸ Therefore, representation remains with the Social Welfare Services throughout the asylum procedures except for judicial proceedings where the Commissioner for Children's Rights is responsible for appointing legal representation.

According to the law, guardianship has automatic and immediate effect, without a decision or act and representation must be taken up and carried out as soon as possible. There is no procedural formality for the Social Welfare Services to take up guardianship and representation, and they are effective in all procedures related to the child.

The role of the representative entails assistance and representation during the administrative examination of the asylum application. In addition, the law provides that the Asylum Service shall ensure that the representative is given the opportunity to inform the unaccompanied child about the meaning and possible consequences of the personal interview and, where appropriate, how to prepare themselves for the personal interview. The Asylum Service, per the Law, allows the representative to be present at the first instance interview and ask questions or make comments, within the framework set out by the responsible officer/caseworker who conducts the interview. On the other hand, the guardian is responsible for the overall well-being of the child, including accommodation, school arrangements, and access to healthcare.

In practice, the representation is carried out by the Social Welfare Services, and specifically by the child's appointed Guardian. The Guardian/Representative does not usually have adequate knowledge on asylum issues although they may undergo basic training on legal or asylum issues. During the interview, the Representative is always present, but does not contribute in a substantial way as they rarely ask any questions or make any comments after the interview.³⁸⁹ In addition, they often act against their role as legal representative and the child's best interest such as initiating age assessment without adequate reasoning.³⁹⁰

The number of UASC arriving in the country increased significantly in 2021 and again in 2022, reaching approximately 1,200 UASC. In 2023, 957 applications were submitted by UASC bringing the number of UASC in the country at end of year to 1,298. In 2024, 656 applications were submitted by UASC, bringing the number of UASC in the country at end of year to 950.³⁹¹

In 2022, there was an increase in the number of Social Welfare Officers assigned as Guardians. In 2023, the increase in Guardians was maintained with the total number being 33, of which 8 are stationed in the First Registration Center in Pournara. In 2024, there were 35 Guardians.³⁹² There are no limits on the maximum number of unaccompanied children that a Guardian/Representative can be in charge of at the same time and on average they are in charge of 20-30 children at a time, depending on the district. Therefore in most settings, the number of Guardians/Representatives remains insufficient to adequately respond to the needs of the children, including legal representation. Furthermore, there are no complaint mechanisms for children to submit complaints against their Guardian or Representative.³⁹³

³⁸⁸ Procedural Rules 3/2014, available in Greek at: <http://bit.ly/2mKdxvp>.

³⁸⁹ Information provided by the Cyprus Refugee Council and lawyers representing cases of UASC.

³⁹⁰ IPAC Case no. 601/2016, Y.D.M.O v. Asylum Service, Decision issued 31 December 2021.

IPAC Case no. 1475/2022, C.M. v. Asylum Service, Decision issued 9 December 2024.

³⁹¹ Information provided by the Cyprus Asylum Service and Social Welfare Services.

³⁹² Ibid.

³⁹³ Information provided by the Cyprus Refugee Council.

When the asylum application of a UASC is rejected, the SWS notifies the Commissioner for Children's Rights who appoints a lawyer for this purpose. Until 2021, a lawyer would be assigned by the Commissioner with instructions to submit an appeal without prior assessment on the merits of the case. In 2021 the Commissioner requested of the SWS to prepare a report/assessment on why an appeal should be submitted on behalf of the child. Such a report is prepared in all cases however it only includes the facts of the case and the UASC's intention and consent to appeal the negative decision and not an actual assessment on the merits of the case. The Commissioner then proceeds to appoint a lawyer in all cases with instructions to submit an appeal. The legal representation offered by the Commissioner concerns representation at first instance judicial procedures and not for a forward appeal

UASC who receive a first instance negative decision by the AS after they attain the age of majority, can still be represented by the Commissioner. In practise, however very few such cases reach the Commissioner, as the UASC do not have knowledge of this possibility and after reaching the age of majority lose contact with the Guardian that was assigned to them as minors.³⁹⁴

The Commissioner carries out trainings with selected lawyers on the representation of children in asylum cases from time to time and has a list of lawyers who have received relevant training to represent, where needed, unaccompanied children in the judicial proceedings of the asylum procedure. When an UASC receives a negative decision on their asylum claim, the Guardian informs the Commissioner for Children's Rights and requests the appointment of a lawyer that would represent the child before the IPAC. The appointed lawyer, along with an officer from the Commissioner for Children's Rights office, have a joint meeting with the child to inform them of the appointment and the procedure to be followed. The representation continues until the case is concluded before the court, regardless of whether the child has reached the age of maturity while the procedure is ongoing.

The legal and policy framework for unaccompanied children has been repeatedly criticised by the national Ombudsman since 2014, pointing out gaps in both policy and practice.³⁹⁵ In 2018, the Commissioner for the Rights of the Child issued a series of three reports related to unaccompanied children, raising serious concerns on many issues such as the lack of representation for unaccompanied children with regard to their access to reception conditions and that legal representation before the Court is limited to asylum cases and not reception conditions. Furthermore, it raised concerns that the law provides that unaccompanied children and their representatives are provided with free legal and procedural information but does not specify or foresee who provides such information. The reports also conclude that the legal representation provided by the SWS is problematic and that the dual role of the SWS that acts as a Guardian and representative is also considered problematic.³⁹⁶ Since the Reports and throughout 2022, 2023 and 2024 no improvements have been noted and the issues raised by the Commissioner remain issues of concern.

³⁹⁴ Information provided by Cyprus Refugee Council.

³⁹⁵ Ombudsman, *Intervention regarding the treatment of unaccompanied children*, 29 May 2014; *Report regarding the system of protection and representation of Unaccompanied Minors*, 24 August 2015, 41/2015, available in Greek at: <http://bit.ly/1iZeaPB>.

³⁹⁶ Commissioner for the Rights of the Child, *Έκθεση της Επιτρόπου, αναφορικά με την εκπροσώπηση των ασυνόδευτων ανηλίκων αιτητών ασύλου*, December 2018, available in Greek at: <https://bit.ly/2F8OIL8>.

E. Subsequent applications

Indicators: Subsequent Applications

1. Does the law provide for a specific procedure for subsequent applications? ☒ Yes ☐ No
2. Is a removal order suspended during the examination of a first subsequent application?
 - ❖ At first instance ☐ Yes ☒ No
 - ❖ At the appeal stage ☐ Yes ☒ No
3. Is a removal order suspended during the examination of a second, third, subsequent application?
 - ❖ At first instance ☐ Yes ☒ No
 - ❖ At the appeal stage ☐ Yes ☒ No

All subsequent applications must go through an admissibility procedure.³⁹⁷ Under the Refugee Law, the competent authority for the examination of a subsequent application is the Asylum Service.

According to the Law, if an applicant submits a subsequent application or new elements or findings on their claim after a final decision was made, the competent authority does not treat these as a new application, but as further steps on the initial application.³⁹⁸ In relation to the admissibility of the application, the Asylum Service conducts a preliminary examination to assess whether the submitted information constitutes new elements or findings which the Asylum Service did not already take into consideration when deciding on the initial claim.³⁹⁹ This examination used to require an interview, however, the October 2020 amendment to the Law removed this requirement and the examination is now carried out without an interview.⁴⁰⁰

Furthermore, in accordance with the Law, when the Asylum Service decides that the subsequent application or new elements or findings are admissible, it will continue with the substantive examination of these. The decision will only be considered as a new decision if the elements increase the chances of the applicant receiving international protection, and if the competent authority is satisfied that the applicant could not submit these elements in the initial examination, and especially during the stage of a recourse to the Administrative Court under Article 146 of the Constitution, due to no fault of their own.⁴⁰¹

There are no specific time limits within which the Asylum Service must issue a decision on the admissibility of the subsequent application or new elements or findings.

Up until 2022 it was considered that according to the Refugee Law, once a subsequent application is submitted, the applicant has a right to remain and access reception conditions during the examination of the admissibility of the subsequent application. Furthermore, and according to the Refugee Law, the Asylum Service may decide to terminate the right to remain and access to reception conditions if the applicant appears to have lodged a first subsequent application with the sole objective of delaying or impeding the execution of a decision which would lead to the immediate removal of the applicant from the RoC. The Asylum Service may also decide to terminate these rights if the applicant has lodged a second or further subsequent applications to the Asylum Service, following the issuance of a final decision declaring the first subsequent application inadmissible or after a final decision rejecting it as unfounded, provided that the Asylum service is satisfied that any decision to return or remove the person in question does not involve direct or indirect *refoulement*. In a 2021 case, the Administrative Court confirmed that once a subsequent application is submitted, the applicant retains the status of an asylum applicant.⁴⁰² However, the IPAC in several cases, held the opposite position, *i.e.*, that even upon submission of a

³⁹⁷ Article 16Δ Refugee Law.

³⁹⁸ Article 16Δ(2) Refugee Law.

³⁹⁹ Article 16Δ(3)(a) Refugee Law.

⁴⁰⁰ Article 16Δ(2) Refugee Law.

⁴⁰¹ Article 16Δ(3)(b)(ii) Refugee Law.

⁴⁰² M.F. v. Republic of Cyprus, Case No.: 691/2021, 18 August 2021, available in Greek at: <https://rb.gy/fdunmw>.

subsequent application, during the examination of the admissibility of the subsequent application the applicant does not retain the status of an asylum applicant and it falls upon the discretion of the Head of the Asylum Service to decide on the applicant's right to remain.⁴⁰³

In a 2022 case, the Supreme Court confirmed the position of the IPAC, that once a subsequent application is submitted, the applicant is not considered an asylum applicant, and during the examination of the admissibility of the subsequent application, the discretion to examine the applicant's right to remain in the Republic, belongs to the Head of the Asylum Service.⁴⁰⁴ In case the Head decides that such a right to stay is not granted, they should make sure that, should the applicant be returned, it would not amount to direct or indirect *refoulement*.⁴⁰⁵ In practice, there is no evidence that such an assessment takes place and applicants are never informed about this.⁴⁰⁶ Since the issuance of the court decisions once, a subsequent application is submitted, including a first subsequent application persons do not have a right to remain and no access to any basic rights.

As regards the procedure, in 2020 the Asylum Service set up a procedure and introduced a form which applicants are required to submit. Thanks to this, the process of examining such applications initially became timelier, however due to the rise in such applications the processing time eventually increased. In early 2021, efforts were being made to reduce the backlog; however, this also had an impact on the quality of decisions, as cases were identified that were rejected as inadmissible although the new elements justifiably could not have been submitted before, or would clearly increase the chances of the applicant receiving international protection.⁴⁰⁷ In March 2021, the IPAC issued a decision considering that the Asylum Service had not followed the steps of the admissibility procedure prescribed by the Law, as the element was indeed new and should have been examined, and did increase the chances of receiving protection.⁴⁰⁸

In 2022, according to the Asylum Service, in an effort to speed up the procedure, 16 caseworkers were appointed to examine subsequent applications. Throughout 2022, the examination time for newly submitted subsequent application was 3-4 months however many applications submitted in prior years were still pending. In 2022, 357 applicants of subsequent applications were considered admissible and 3,909 inadmissible.

In 2023 a significant number of applications were examined in a timely manner some even within days. However, this mainly concerned applications that were evidently unfounded and there are still applications pending from previous years, including applications submitted by vulnerable persons and/or with elements that could add to the likelihood of an asylum-applicant qualifying as a beneficiary of refugee status or subsidiary protection. The situation continued in 2024.⁴⁰⁹

In 2024, 295 applicants of subsequent applications were considered admissible and 1,600 applicants inadmissible, compared to 233 admissible subsequent applicants against 4,383 inadmissible subsequent applicants in 2023.⁴¹⁰

In early 2023, due to the high numbers of subsequent applications submitted, in an effort to deter the submission of unfounded subsequent applications, the Cyprus Asylum Service, in collaboration with the Police, carried out arrests of persons approaching the Cyprus Asylum Service to submit a subsequent

⁴⁰³ A.K.U. v. Republic of Cyprus, Case No.: ΔK24/21, 12 April 21, available in Greek at: <https://rb.gy/xmdrq6>; H.S. v. Republic of Cyprus, Case No.: ΔK29/21, 13 August 2021, available in Greek at: <https://rb.gy/khesfg>.

⁴⁰⁴ Appeal against the decision of the Administrative Court No. 8/2022, Sohel Madber v. Republic of Cyprus, 17 November 2022, available in Greek at: <https://rb.gy/xrdoyp>.

⁴⁰⁵ 16Δ (4)(a), Refugee Law.

⁴⁰⁶ Information provided by the Cyprus Refugee Council.

⁴⁰⁷ Based on cases represented by the Cyprus Refugee Council.

⁴⁰⁸ IPAC, Decision 782/2020 J.Y.v. Republic of Cyprus (Asylum Service), 5 March 2021, available in Greek at: <https://bit.ly/3Tsqcnt>.

⁴⁰⁹ Information provided by the Cyprus Refugee Council.

⁴¹⁰ Information provided by the Cyprus Asylum Service.

application and transferring them directly to detention, with no evidence that any assessment of refoulement was carried out. At the time, it was not clear if all persons arrested were permitted to submit a subsequent application in detention.

Throughout 2024, police were often present at the Asylum Service, however it is not clear if arrests were made of applicants attempting to submit a subsequent application. Cases were identified where arrests were made at the Asylum Service of persons whose subsequent application was rejected and were notified to receive the decision.⁴¹¹

If the Asylum Service considers the subsequent application inadmissible, an appeal can be submitted before the IPAC. Such appeal, however, does not have automatic suspensive effect, and a separate application must be submitted to the IPAC requesting the right to remain pending the examination of the appeal. The procedure to submit such an application was not provided for in the procedural rules, until their amendment in 2022. Following the reasoning of the Administrative Court in a 2021 case,⁴¹² the amended Regulations provide that the application for the right to remain must be submitted at the same time as the appeal, and in any case within the deadline for the submission of the appeal, which is 15 days.⁴¹³ The prescribed form for the application is provided for in the Regulations, as Form number 4. The Form can be found at the counter of the Registry of the IPAC, however, it is not always readily available and often requires the applicant to request it. In addition, there is no information materials provided by the IPAC regarding the need to file the right to remain application alongside the appeal, although the requirement to make such an application is included in the first-instance decision issued by the Asylum Service.

Furthermore, up until 2021 it was not clear whether a request to the IPAC for the right to remain does indeed have automatic suspensive effect as it does in other cases.⁴¹⁴ In March 2021, the IPAC decided that when a person submits a subsequent application and that application is found inadmissible, the decision to reject this person's first asylum application, remains final and thus the person does not retain the asylum applicant status.⁴¹⁵ In August 2021, the IPAC differentiated between subsequent applications that are found inadmissible and manifestly ill founded, deciding that when a subsequent application is found to be inadmissible and the right to stay is terminated, the applicant does not have the right to remain during the pending of the deadline to submit an appeal against the decision, and neither until the Court decides on the request for the right to stay.⁴¹⁶ In 2022, the Supreme Court decision set the precedent, by reaffirming the position of the Administrative Court that the submission of a subsequent asylum application begins with the fact that the applicant is not an asylum applicant. It therefore starts with the status that the applicant had, after the rejection of the first asylum application became final.⁴¹⁷ If the applicant submits an interim application of the right to stay, the submission of such an application does not on its own suspend the removal decision.

⁴¹¹ Information provided by the Cyprus Refugee Council.

⁴¹² *Miah v. Republic of Cyprus*, Case No. 593/21, 19/07/2021, 19 July 2021, available in Greek at: <https://rb.gy/ukfcag>.

⁴¹³ Article 13 of the IPAC's amended Regulations (as amended in October 2022).

⁴¹⁴ *A.K.U. v. Republic of Cyprus*, Case No.: ΔΚ 24/21, 12 April 2021, available in Greek at: <https://bit.ly/3wMV2Od> and *SINGH v. Ministry of Interior and others*, Case No.: 730/2021, 23/8/2021.

⁴¹⁵ *A.K.U. v. Republic of Cyprus*, Case No.: ΔΚ24/21, 12 April 2021, available in Greek at: <https://rb.gy/xmdrq6>

⁴¹⁶ *H.S. v. Republic of Cyprus*, Case No.: ΔΚ29/21, 13 August 2021, available in Greek at: <https://rb.gy/khesfg>

⁴¹⁷ Appeal against the decision of the Administrative Court No. 8/2022, *Sohel Madber v. Republic of Cyprus*, 17 November 2022, available in Greek at: <https://rb.gy/xrdoyp>.

F. The safe country concepts

Indicators: Safe Country Concepts

- | | |
|--|---|
| 1. Does national legislation allow for the use of “safe country of origin” concept? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| ❖ Is there a national list of safe countries of origin? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| ❖ Is the safe country of origin concept used in practice? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Does national legislation allow for the use of “safe third country” concept? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| ❖ Is the safe third country concept used in practice? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Does national legislation allow for the use of “first country of asylum” concept? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

1. Safe country of origin

Article 12B-ter of the Refugee Law defines safe country of origin with reference to the recast Asylum Procedures Directive. This includes countries set out in a common EU list,⁴¹⁸ as well as the possibility to designate additional countries based on a range of sources of information, as per Article 37 of the recast Asylum Procedures Directive. The “safe country of origin” concept may be used as a ground for channelling the application in the accelerated procedure.⁴¹⁹

The safe country of origin was used for the first time in mid-2019 with the issuance of a Ministerial Decision designating Georgia. This initiated, also for the first time, the use of accelerated procedures to examine asylum applications submitted by Georgians (see [Accelerated Procedure](#)).⁴²⁰ The new list, increasing the number of safe countries of origin from 1 to 21, was published in May 2020,⁴²¹ In May 2021, the number of countries listed as safe was increased from 21 to 29⁴²² and in May 2022 reduced to 27 as Ukraine and Kosovo were removed.⁴²³

There are no exceptions for specific geographical areas or profiles of asylum seekers within a country of origin. Overall, the conditions in countries designated as safe countries of origin are not reviewed regularly and the May 2022 list remains in force.

Accelerated procedures were not significantly used until September 2022 and from then on have been used systematically and throughout 2024 focusing mostly on nationalities such as Pakistan, Bangladesh, India, Nepal and Nigeria.⁴²⁴

2. Safe third country

The definition of safe third country is provided in Article 12B of the Refugee Law and mirrors the provision of Article 38 of the recast Asylum Procedures Directive. This may be used as a ground for inadmissibility and a ground for using the accelerated procedure.

⁴¹⁸ While the recast Asylum Procedures Directive currently provides no legal basis for an EU list, this could be done through the adoption of the Commission proposal for a Regulation establishing a common EU list of safe countries of origin.

⁴¹⁹ Article 12Δ(1) Refugee Law.

⁴²⁰ Ministerial Decision on Safe Countries, available in Greek at: <http://bit.ly/37YKdbU>.

⁴²¹ Ministerial Decision on Safe Countries, available in Greek at: <https://bit.ly/3CjDCJQ>.

⁴²² Ministerial Decision on Safe Countries, available in Greek at: <https://bit.ly/3tyT40M>. The countries included in the updated list are: 1. Egypt; 2. Albania; 3. Algeria; 4. Armenia; 5. Vietnam; 6. Northern Macedonia; 7. Bosnia and Herzegovina; 8. Georgia; 9. Gambia; 10. Ghana; 11. India; 12. Kenya; 13. Kosovo; 14. Morocco; 15. Montenegro; 16. Mongolia; 17. Moldova; 18. Bangladesh; 19. Benin; 20. Nepal; 21. Nigeria; 22. Ukraine (excluding Crimea, Luhansk and Donetsk regions); 23. Pakistan; 24. Senegal; 25. Serbia; 26. Sri Lanka; 27. Togo; 28. Tunisia; 29. Philippines.

⁴²³ Ministerial Decision on Safe Countries, Ukraine, and Kosovo are removed, available in Greek at: <https://bit.ly/42jOTpX>.

⁴²⁴ Based on information provided by Cyprus Refugee Council.

3. First country of asylum

The concept of first country of asylum is defined in Article 12B-quinquies of the Refugee Law, which mirrors Article 35 of the recast Asylum Procedures Directive. This may also be used as a ground for inadmissibility and a ground for using the accelerated procedure.

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

Indicators: Information and Access to NGOs and UNHCR

1. Is sufficient information provided to asylum applicants on the procedures, their rights and obligations in practice? ☐ Yes ☒ With difficulty ☐ No

❖ Is tailored information provided to unaccompanied children? ☒ Yes ☐ No
2. Do asylum applicants located at the border have effective access to NGOs and UNHCR if they wish so in practice? Not applicable
3. Do asylum applicants in detention centres have effective access to NGOs and UNHCR if they wish so in practice? ☒ Yes ☐ With difficulty ☐ No
4. Do asylum applicants accommodated in remote locations on the territory (excluding borders) have effective access to NGOs and UNHCR if they wish so in practice? ☐ Yes ☒ With difficulty ☐ No

In accordance with the law,⁴²⁵ the Asylum Service shall issue a leaflet (*φυλλάδιο*) in a language which the applicants can understand or are reasonably supposed to understand concerning: the benefits to which they have a right to in relation to reception conditions and the procedures required to access these benefits; the obligations with which they must comply in relation to the reception conditions; the organisations or groups of persons that provide specific legal assistance; and organisations that might be able to help or inform the applicant about existing reception conditions, including health care.

The Refugee Law also provides that the leaflet is given to applicants when they lodge their application by the responsible person at the authority responsible for receiving asylum applications, the AIU, as well any other necessary information regarding reception conditions, which may be provided orally or in writing in a language that they understand or are reasonably supposed to understand.⁴²⁶ The Asylum Service must ensure that the above information is provided within a reasonable time, not exceeding 15 days from lodging the application and for this purpose provides the necessary guidance.

In practice, the provision of information has always been one of the most important gaps in the system and remained so throughout 2024. Overall, there is extremely limited information available, written or otherwise and very few information providers, mainly NGOs with limited capacity.

The Asylum Service issues an information leaflet, which can be found on its official website.⁴²⁷

Regarding information provision in **Pournara**, in 2023 and still in 2024, 3 EUAA Info Providers are stationed at the Centre providing group sessions in the presence of interpreters. The group sessions are provided in groups of approximately 10 adults and include information on the registration process in the

⁴²⁵ Article 9A Refugee Law.

⁴²⁶ Article 9A(2) Refugee Law.

⁴²⁷ Asylum Service, *Guide for applicants for international protection (asylum applicants) and for beneficiaries of international protection*, available [here](#).

Reception Center, the asylum procedure, and reception conditions. While at present the information is provided orally, the aim is to provide information in writing in the future. In the meantime, 2 leaflets, issued by the Asylum Service are provided; one explaining the Dublin procedure, and the other the asylum procedure. The information sessions are a positive development however they are not sufficient to cover the overall lack of information on the asylum procedures, especially due to extremely limited sources of information and in view of the lengthy asylum procedures.⁴²⁸

A leaflet published by UNHCR is also disseminated in Pournara Centre, providing basic info on asylum process and reception conditions; however in late 2023 this was put in hold as the leaflet is being updated. It has yet to be reinstated.

Regarding the provision of information to UASC, it is considered to be the responsibility of the Social Welfare Officers who act as Guardians, however this is often insufficient due to the limited capacity of the guardians and their lacking of required knowledge to provide such information.

When lodging an application, applicants are given a leaflet on the Dublin procedure which includes general information on the Dublin procedure, and a separate information leaflet is available specifically for unaccompanied children.⁴²⁹ The leaflet also includes contact numbers of government and European agencies involved in the Dublin procedure as well as UNHCR.

Other information materials are produced by NGOs such as information leaflets, booklets, online platforms, and websites, regarding the asylum procedure, asylum applicants' rights and obligations, and available support services. However, these are not always available nor are they updated consistently since they are often prepared within the framework of various European-funded projects. These leaflets/booklets may be available at various access points for asylum applicants only if the implementing agencies take the initiative to disseminate them or if the asylum applicants come into contact with the NGOs providing direct assistance.

The UNHCR Representation in Cyprus also has an online information platform for asylum applicants and refugees since 2017, covering asylum procedures; the rights and duties of asylum applicants and refugees; and information about government programmes and NGOs that offer various types of assistance and integration support.⁴³⁰ The platform is available in English, French and Arabic. The UNHCR online information platform includes specific information for unaccompanied children.⁴³¹

As regards decisions, according to the Refugee Law, the Head of the Asylum Service must inform the applicant about the decision on their application and the timeframe to exercise their right to appeal in a language that they understand or may reasonably be considered to understand.⁴³² In practice, the decision of the Asylum Service is provided in written form, the first page is provided only English and includes whether a status has been granted or not, as well as the relevant legal provisions. Until late 2022, only a half-page summary of the reasoning of the decision was provided and this was only in Greek or rarely in English, whereas a detailed reasoning of the decision exists in the file at the Asylum Service, as well as the interview transcript. From late 2022 onwards, a detailed reasoning of the decision is provided in cases of negative decisions, in English or Greek, which is a positive development as it provides the applicant and legal advisors/lawyers with immediate access to the reasons the asylum application has been rejected.

The UNHCR online platform also provides information in English, Arabic and French regarding judicial appeal before the IPAC and how to apply for legal aid.⁴³³

⁴²⁸ Information provided by Cyprus Refugee Council.

⁴²⁹ Asylum Service, *Information leaflets on the Dublin Regulation and the Eurodac Regulations*, available [here](#).

⁴³⁰ UNHCR, *UNHCR Help – Cyprus*, available at: <https://bit.ly/3rSApKs>.

⁴³¹ UNHCR, *If you are under 18*, available at: <http://bit.ly/2rsW9IY>.

⁴³² Article 18(7E) and (7B) Refugee Law.

⁴³³ UNHCR, *UNHCR Help – Cyprus*, available at: <https://bit.ly/3asLcTE>.

Regarding subsequent applications, currently, there is no information provided by the State on this procedure, including the fact that the applicant does not have the right to remain and no access to basic rights (see [Subsequent Applications](#)).

As for information in detention, in the main detention centre and in prisons, there are leaflets available on the general rights and obligations of detainees, but no information available on the asylum procedure. This often leads to persons not understanding that they may have an asylum claim or how to access the asylum procedures and their right to apply for legal aid and/or access to remedies. According to the Refugee Law, each detained applicant should be informed immediately in writing, in a language which they either understands or reasonably are supposed to understand, the reasons for detention, judicial remedies, and the possibility of applying for free legal assistance and representation in such proceedings in accordance with the Legal Aid Law.⁴³⁴ In practice, detainees are provided with a detention order that includes the articles of the law based on which they are detained and, in brief, the remedies available (see [Detention](#)). There is no justification as to the individual reasons or facts or on procedures to access the available remedies.⁴³⁵

In late 2019, the Cyprus Refugee Council published a leaflet made available in the main detention centre that included information on detention, available remedies, legal aid, and how these can be accessed. It was also disseminated in 2020 and again in 2023.⁴³⁶

According to the Rights of Persons who are Arrested and Detained Law,⁴³⁷ every detainee has the right to have meetings with their lawyer. Lawyers appointed by detainees, legal representatives of NGOs working on asylum issues or UNHCR representatives, can visit asylum applicants in the detention centre and hold meetings with detainees confidentially. No major obstacle has been identified in visitation of lawyers, however representatives of NGOs or UNHCR are obliged to inform of their intention to visit the detention centre or a detainee, whereas lawyers are not. Once such notification is sent, access is allowed and no issues were noted in 2024.

Regarding access of asylum applicants to NGOs and UNHCR, for those residing in the community, there are no issues regarding access other than the limited capacity of NGOs to address the needs and requests of asylum applicants in the country.

Asylum applicants living in reception centers can communicate with NGOs and UNHCR by telephone, email and other online platforms and in person, if they have freedom of movement. However, given the remote location of reception centres, transportation to the major cities, including Nicosia, is often inconvenient. Residents of **Kofinou** Reception Center are provided with a bus card which allows the use of any route within the district of Larnaca. To reach Nicosia or another city they require an additional bus card, which is provided upon request to the administration of Kofinou, for which they must provide the purpose of travel due to limited available bus cards.⁴³⁸

NGO's access to **Kofinou**, **Pournara** and **Limnes** (temporarily relocated as a section of Kofinou due to construction) where asylum applicants are residing is restricted. In order to access centers, NGOs must send a request to the Asylum Service which is not always granted and, in most cases, only NGOs contracted or in agreement to provide services in a center are provided with access.⁴³⁹ Such restrictions are often applied to lawyers or to legal advisors of NGOs when access is requested for the purpose of provision of legal advice or counselling. Specifically regarding **Pournara**, the CPT noted in 2024 that

⁴³⁴ Article 9ΣΤ(8) Refugee Law.

⁴³⁵ Information provided by the Cyprus Refugee Council.

⁴³⁶ Information provided by Cyprus Refugee Council.

⁴³⁷ Article 12 Rights of Persons who are Arrested and Detained Law.

⁴³⁸ Information provided by Cyprus Refugee Council.

⁴³⁹ Statewatch, *Civic space in Cyprus must be protected*, 14 February 2004, available [here](#).

access to Pournara Centre was hindered for some civil society bodies. For others, it was restricted to the provision of limited activities and not the provision of *pro bono* legal advice.⁴⁴⁰

H. Differential treatment of specific nationalities in the procedure

Indicators: Treatment of Specific Nationalities

1. Are applications from specific nationalities considered manifestly well-founded? ☒ Yes ☐ No
❖ If yes, specify which: Syria, Eritrea, Yemen, Palestinian Territories (Gaza)
2. Are applications from specific nationalities considered manifestly unfounded?⁴⁴¹ ☒ Yes ☐ No
❖ If yes, specify which: All countries considered 'safe countries'

The Asylum Service at times may give priority to the examination of asylum applications in two cases: cases that are likely to be unfounded because of the country of origin of the applicant and countries that are going through a political or humanitarian crisis and are likely to be well-founded.⁴⁴²

In the first case, the Asylum Service aims to examine asylum applications from countries included in the 'safe countries' list soon after they have been submitted. However, due to the backlog this is not always possible.

In cases of asylum applicants from countries that are going through a political or humanitarian crisis, the examinations of their asylum applications are usually put on hold until the authorities decide of a policy that will be followed. Examples of this occurred in the past with Iraqi and Syrian asylum applicants. In both instances, the examination of the asylum applications was on hold for approximately two years, but once examinations resumed, priority was given to these cases for a certain period of time.⁴⁴³

Subsidiary protection is granted as a matter of policy to applicants from **Syria**: in 2020, 21 persons received refugee status and 1,396 received subsidiary protection. In 2021, 24 persons received refugee status and 1,913 subsidiary protection.

From February 2022 onwards, the Cyprus Refugee Council noted that the asylum applications of Syrian nationals were not being examined.⁴⁴⁴ No official policy on the matter was made public at the time, however the annual statistics confirmed that only an extremely low number of applications were decided on as 167 Syrian nationals received protection in 2022 (8 persons received refugee status and 159 subsidiary protection, of which 129 in January 2022).⁴⁴⁵ In early 2023, the situation remained the same but in mid-2023 examination resumed and by the end of the year, 2,040 persons had received subsidiary protection and 43 persons refugee status.

In early 2024, examination of asylum applications of Syrian nationals continued, however on 15 April 2024, the Government announced a new policy suspending the processing of asylum claims by Syrians. This decision is currently affecting some 14,000 Syrians, leaving them in legal limbo and dependent on

⁴⁴⁰ CPT, *Report to the Government of Cyprus on the visit to Cyprus carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 9 to 17 May 2023*, available [here](#).

⁴⁴¹ Whether under the "safe country of origin" concept or otherwise.

⁴⁴² Information provided by Cyprus Refugee Council.

⁴⁴³ Information provided by Cyprus Refugee Council.

⁴⁴⁴ Information based on cases represented by the Cyprus Refugee Council.

⁴⁴⁵ Information provided by Cyprus Asylum Service.

State aid for housing and subsistence.⁴⁴⁶ The Policy applies to all Syrian asylum applicants, regardless of the date of submission.⁴⁴⁷

In 2024, 48 persons received refugee status and 1,757 received subsidiary protection, with the vast majority of decisions issued between January and April 2024.⁴⁴⁸ The policy of not examining applications of Syrian nationals remains in place since then, with few exceptions of vulnerable persons receiving protection.⁴⁴⁹

Since 2015, Palestinians from Syria receive refugee status, however statistically they are registered as Syrian nationals, which indicates that among the persons receiving refugee status and registered as Syrian nationals many are actually Palestinians from Syria.⁴⁵⁰

⁴⁴⁶ UNHCR, *Thematic Fact Sheet on Reception in Cyprus with updates through December 2024*, available [here](#); Phileleftheros, *President: The examination of asylum applications in all cases of persons of Syrian origin is suspended*, 13 April 2024, available in Greek at: <https://bit.ly/4aV5a8m>.

⁴⁴⁷ Information provided by Cyprus Refugee Council.

⁴⁴⁸ Information provided by Cyprus Asylum Service.

⁴⁴⁹ Information provided by Cyprus Refugee Council.

⁴⁵⁰ Statelessness Index, *Country Profile Cyprus*, available at: <http://bit.ly/2TMRKH2>.

Reception Conditions

Short overview of the reception system

Asylum applicants in Cyprus have the right to access reception conditions during the administrative and judicial examination of their asylum applications. Access to reception conditions is not ensured during the judicial examination of decisions issued in the accelerated procedure; subsequent applications; decisions that determine the asylum application is unfounded or inadmissible; and decisions related to explicit or implicit withdrawal.

The Asylum Service, under the newly established Deputy Ministry of Migration and International Protection, is responsible for coordinating all other authorities on asylum issues, including related to reception. The Asylum Service is also responsible for the operation of reception and accommodation centres for asylum applicants.⁴⁵¹ Although they may have a coordinating role, each right under reception conditions is provided for by the competent Ministry,⁴⁵² as a result four Ministries are involved, which often leads to fragmented and uncoordinated approach and planning. With the establishment of the Deputy Ministry of Migration and International Protection, reception conditions that have until now been the responsibility of the Social Welfare Services are expected to be transferred to the Deputy Ministry of Migration and International Protection, however this has yet to take place.

Since 2019, all persons wishing to apply for asylum who entered the country in an irregular manner are referred to the **Pournara** First Reception Centre for registration, lodging of asylum application, and medical and vulnerability screenings. Access to reception conditions is provided at the Centre for the duration of stay which in 2024 was approximately 90 days. Upon exiting the Centre, asylum applicants have access to reception conditions in the community or in the Reception Centres (**Kofinou**, UASC shelters), whereas a limited number of persons are moved to the Reception/Pre-Removal Center, **Limnes**. For persons who arrived in a regular manner, they will have access to reception conditions upon concluding registration.

Living conditions in **Kofinou** are considered decent, whereas in recent years there has been criticism on the conditions in **Pournara** and **Limnes** which were evaluated as sub-standard. This led to the authorities taking action and with the support of EUAA, the conditions in **Pournara** have improved. In the case of **Limnes**, it has been closed to undergo a complete restructuring and a section of Kofinou Centre is being used temporarily to host persons that would have been accommodated in Limnes. Regarding shelters for UASC, conditions vary depending on the facility; at times, overcrowding has been an issue in some shelters. Furthermore, due to the increase in arrivals of UASC and lack of capacity to house them in the UASC shelters, hotels have been used as a temporary measure, since 2022 however conditions in the hotels are not considered up to standard.⁴⁵³ The use of hotels continued in 2024.⁴⁵⁴

With the total number of asylum applicants reaching over 25,000 by the end of 2023, and just over 20,000 by the end of 2024, and the capacity of Reception Centres being limited to around 1,400 persons, most asylum applicants reside in the community in private houses/apartments, which they are required to secure on their own. SWS bears the responsibility of processing applications and addressing asylum applicants' needs, including the allocation of an allowance to cover housing expenses. The asylum applicant is expected to provide all necessary documentation. In 2024, 2,418 households/cases (4000

⁴⁵¹ EASO, *EASO Operating Plan, Cyprus 2022-2024*, available at: <https://bit.ly/3PT3UuO>.

⁴⁵² Material Reception Conditions by the Social Welfare Services under the Deputy Minister of Social Welfare; Employment under the Ministry of Labour and Social Insurance; Education under the Ministry of Education, Culture, Youth and Sports; Healthcare under the Ministry of Health.

⁴⁵³ Commissioner for Child's Rights, 'Memorandum of the Commissioner for the Protection of the Rights of the Child for the discussion on "The government's actions to find a suitable space for the creation of adolescent immigrant protection structures, as an obligation of the state stemming from the Recovery and Resilience Plan" at the Parliamentary Committee on Interior, on 23/11/2023' available [here](#)

⁴⁵⁴ Information provided by Cyprus Refugee Council.

individuals including children) applied for welfare assistance as part of the Material Reception Conditions and in 2024 on average 5000 households/cases (7500-8000 individuals including children) received welfare assistance as part of the Material Reception Conditions.⁴⁵⁵

Arrivals in 2024 were significantly lower, however it continued to be an extremely challenging year for the country's reception system. The ongoing absence of a comprehensive reception system combined with the stringent measures adopted by the authorities to address migration and refugee flows had a severe impact on the ability of the reception system to address the needs of newly arrived persons, as well as of those already present in the country.⁴⁵⁶

Reception standards remain below adequate levels, exposing asylum applicants to the risk of homelessness and destitution. The majority of asylum applicants live in the community and are often extremely destitute. Centres still require measures to ensure acceptable sanitation and hygiene standards for all, as well as to provide safeguards against sexual and gender-based violence for both children and single women. The timely identification and especially the response to the needs of vulnerable individuals, including children, both within reception facilities and in the community, requires improvement.

In 2023, there was a significant surge in violence against migrants in Cyprus, with incidents including pogrom-like demonstrations and violent attacks against racialised people, including migrants and refugees.⁴⁵⁷ The main incidents took place in Chloraka a village at the outskirts of Paphos City and then Limassol where migrant-owned shops were destroyed and several people were attacked by mobs. There has also been a rise in attacks and reports of police profiling. Experts have blamed the increased mainstreaming of xenophobia in Cypriot politics and media, fuelled by the spread of disinformation and the mismanagement of the large number of people trying to reach Europe.⁴⁵⁸ Violence against migrants continued in 2024, including frequent racist attacks especially against non-EU delivery-persons,⁴⁵⁹ hate speech,⁴⁶⁰ police profiling,⁴⁶¹ and incidents of police entering private accommodation to identify undocumented persons.⁴⁶²

The European Commission on Racism and Intolerance (ECRI) in the latest report published on Cyprus in 2023, recommends that the authorities establish a comprehensive monitoring system for hate speech incidents, involving the police, the prosecution service, the courts, the equality body and relevant civil society organisations, especially those supporting refugees, asylum applicants, and migrants. Furthermore, ECRI recommends that the authorities step up their efforts in encouraging public figures, in particular high-level officials and religious leaders, to firmly and promptly condemn the use of racist and other forms of hate speech, use counter-speech and alternative speech, and promote intergroup understanding.⁴⁶³ No progress was noted in 2024 in relation to the ECRI recommendations.

⁴⁵⁵ Information provided by Social Welfare Services.

⁴⁵⁶ Information provided by Cyprus Refugee Council.

⁴⁵⁷ ECRE Weekly Bulletin of 8 September 2023, *Racist violence against migrants in Cyprus*, available at: <https://bit.ly/48rcNIE>; Amnesty International, 'Cyprus: Authorities must protect migrants and refugees from racist attacks' available at: <https://bit.ly/47aEiil>.

⁴⁵⁸ France 24, *Cyprus migrants face wave of attacks as hostility brews*, 12 September 2023, available at: <https://bit.ly/3RyTYWZ>.

⁴⁵⁹ See, e.g., Cyprus Mail, *22 attacks on delivery drivers so far this year, Limassol police say*, 20 November 2024, available [here](#).

⁴⁶⁰ Cyprus Mail, *Elam march in protest against migration in Larnaca*, 8 November 2024, available [here](#).

⁴⁶¹ Philenews, *Cyprus Police urged to avoid racial profiling*, 6 September 2024, available [here](#).

⁴⁶² Philenews, *Limassol migrant death: Flatmate refutes police account*, 13 April 2024, available [here](#).

⁴⁶³ European Commission on Racism and Intolerance (ECRI), *Sixth Cycle Report on Cyprus*, 7 March 2023, available at: <https://bit.ly/3tw7SBb>.

A. Access and forms of reception conditions

1. Criteria and restrictions to access reception conditions

Indicators: Criteria and Restrictions to Reception Conditions

1. Does the law make allow access to material reception conditions to for asylum applicants in the following stages of the asylum procedure?
- | | | | |
|--------------------------|---|--|--|
| ❖ Regular procedure | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Reduced material conditions | <input type="checkbox"/> No |
| ❖ Dublin procedure | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Reduced material conditions | <input type="checkbox"/> No |
| ❖ Accelerated procedure | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Reduced material conditions | <input type="checkbox"/> No |
| ❖ First appeal | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Reduced material conditions | <input checked="" type="checkbox"/> No |
| ❖ Onward appeal | <input type="checkbox"/> Yes | <input type="checkbox"/> Reduced material conditions | <input checked="" type="checkbox"/> No |
| ❖ Subsequent application | <input type="checkbox"/> Yes | <input type="checkbox"/> Reduced material conditions | <input checked="" type="checkbox"/> No |
2. Is there a requirement in the law that only asylum applicants who lack resources are entitled to material reception conditions? ☒ Yes ☐

During the administrative and judicial instance of the procedure, asylum applicants have the right to access material reception conditions. Specifically, according to national legislation, asylum applicants are entitled to material reception conditions as follows:

Regular and accelerated procedure: Asylum applicants are entitled to material reception conditions throughout the regular and accelerated procedures.

Dublin procedure: During the procedure to identify the Member State responsible, a person is considered an asylum applicant.⁴⁶⁴ Thus, if a person arrives in Cyprus and there is a possibility that another Member State is responsible, they enjoy all the rights as an asylum applicant including material reception conditions. Regarding asylum applicants returned to Cyprus under the Dublin Regulation, if their asylum case is still under examination, they will be entitled to material reception conditions. If their asylum application has been determined upon, they are not entitled to reception conditions and may be detained.

Appeals: Appeals submitted before the IPAC for decisions issued in the regular procedure have suspensive effect and provide access to reception conditions until the issuance of the IPAC's decision. An appeal for decisions issued in the accelerated procedure; subsequent applications; decisions that determine the asylum application unfounded or inadmissible; and decisions related to explicit or implicit withdrawal do not have suspensive effect and a separate application must be submitted before the IPAC requesting the right to remain.⁴⁶⁵

Subsequent application: Until 2022, once a subsequent application was submitted the applicant had the right to remain and access reception conditions during the examination of the admissibility of the application.⁴⁶⁶ However, following a 2022 decision issued by the Supreme Court, once a subsequent application is submitted, the applicant is not considered an asylum applicant, and until the administrative examination of the subsequent application, the discretion to examine the applicant's right to remain in the Republic, belongs to the Head of the Asylum Service (see [Subsequent Applications](#)).⁴⁶⁷ In practice, no applicant receives the right to remain and access to reception conditions during the administrative examination of a subsequent application.⁴⁶⁸

⁴⁶⁴ Article 11(B)(2) Refugee Law.

⁴⁶⁵ Article 8 (1A) Refugee Law.

⁴⁶⁶ 16Δ (4)(a), Refugee Law.

⁴⁶⁷ Appeal against the decision of the Administrative Court No. 8/2022, Sohel Madber v. Republic of Cyprus, 17 November 2022, available in Greek at: <https://rb.gy/xrdoyp>.

⁴⁶⁸ Information provided by Cyprus Refugee Council.

According to the Refugee Law,⁴⁶⁹ when an application for asylum is made, the AIU refers the applicant to the district SWS. The applicant has a right to apply for the provision of material reception conditions upon presenting a confirmation that the application has been made.⁴⁷⁰ However, the law⁴⁷¹ also provides that this confirmation is provided three days after the application is actually lodged. Furthermore, the Law allows for six days to elapse between making and lodging an application.⁴⁷² The transposition of the recast Reception Conditions and Asylum Procedures Directives into the Refugee Law is problematic with regard to the distinction between “making” and “lodging” an application and, as a result, the time upon which access to reception conditions is actually provided.

In practice and since 2019, all persons wishing to apply for asylum who entered the country in an irregular manner, which are the majority of applicants, are referred to the **Pournara** First Reception Centre for registration, the lodging of asylum applications, and medical and vulnerability screenings. Since the registration of asylum applicants takes place at **Pournara**, access to reception conditions is directly impacted by the possibility for persons to access Pournara. During 2020 and 2021 access to **Pournara** to register asylum applications was problematic.⁴⁷³ In early 2022, it was reported that every day on average 40-50 persons were not admitted for registration, and were forced to keep returning every morning until given access.⁴⁷⁴ In late 2022, the situation remained the same and, due to the high number of arrivals, it was decided to admit a maximum of 60 persons per day to keep the numbers of persons in the Centre under control. As a result, approximately 40 persons were denied admission each day, leading to some persons entering the Centre irregularly in order to find shelter and others sleeping outdoors in front of the registration gate in the hopes of securing a position in the queue the following day. Several makeshift tents and shelters appear at times around the centre, mostly inhabited by persons awaiting registration. Persons with a passport or some form of identification document are systematically given access faster.

In 2023, the number of arrivals decreased which led to a significant improvement in access to the Centre, with most persons accessing upon arrival, however there were still instances where persons who do not present passports were denied entry by the AIU for 2-3 days. In 2024, there were no issues in accessing the Center with the exception of the practice followed from May to November 2024, when there were instances of persons reaching the Center and requesting access to asylum procedures who were taken by the AIU to the Buffer Zone (see section: [Access to Territory](#)).

Access to reception conditions is provided at the Centre for the duration of the registration procedures. In 2023, the average duration of stay was 30-40 days for adults and 80 days for UASC. In 2024, the duration of stay was similar to 2023, however there was a significant number of cases where the duration of stay for adults and families reached 3 months and for UASC 4 months.⁴⁷⁵ Upon exiting the Centre, asylum applicants have access to reception conditions in the community or in the Reception Centres (**Kofinou**, UASC shelters), whereas a limited number of persons are moved to the Reception/Pre-Removal Center, **Limnes** (temporarily relocated as a section of Kofinou due to construction, see *infra*). As there is limited capacity at Kofinou Reception Center, the majority of asylum applicants live in the community. To exit Pournara, asylum applicants have to present to the authorities a valid address, without receiving any

⁴⁶⁹ Article 9IA(3) Refugee Law.

⁴⁷⁰ The confirmation provided is entitled ‘Confirmation of Submission of an Application for International Protection’.

⁴⁷¹ Article 8(1)(b) Refugee Law.

⁴⁷² Article 11(4)(a) Refugee Law.

⁴⁷³ For detailed information, see previous updates of the AIDA Country Report on Cyprus, available at: <https://bit.ly/4aivBFw>.

⁴⁷⁴ Information provided by Cyprus Refugee Council.

⁴⁷⁵ Commissioner for Administration and Protection of Human Rights (Ombudsman), *Report on the visit on February 21, 2025 to the "Pournara" Temporary Reception and Hospitality Center for migrants Immigrants in Kokkinotrimithia*, ΕΜΠ. 8 January 2025, available [here](#). Kathimerini, *In Pournara, 27 unaccompanied minors for over 90 days*, 25 February 2025, available in Greek [here](#).

support to secure one. As a result, especially persons and families with vulnerabilities, as well as large families, often face delays in exiting due to the obstacles in securing housing.⁴⁷⁶

For persons who arrive in a regular manner and who thus register their asylum application at the AIU, they can apply for material reception conditions (MRC) at the District Social Welfare Offices upon concluding registration.⁴⁷⁷

In order to access MRC in the community, an application must be submitted to the Social Welfare Services (SWS). The application can be submitted with the Confirmation letter, however the SWS require the applicant to submit in the application the number on the Aliens Registration Certificate (ARC) to be entitled to all reception conditions (food/clothing allowances, personal expenses, rent).

Until recently, asylum applicants registered in Pournara could only apply for MRC once they had exited the Centre, which led to delays until they received financial assistance. Furthermore, asylum applicants do not have freedom of movement while staying in Pournara, which they can only exit upon presenting a valid address in the community. This means that asylum applicants are not able to easily search for accommodation and are not provided with assistance from State or non-State agencies in this respect. This has led to a significant increase in exploitation and scams from persons in the community toward asylum applicants. In August 2022, the SWS with the assistance of UNHCR and CyRC assisted the Social Welfare Services to pilot a new procedure where asylum applicants submit an application for MRC before exiting the Centre. This led to the procedure being established in Pournara, however due to staffing and organisational issues not all persons are given access to this procedure and persons still exit the centre without applying for MRC. In 2023, even with the decrease in the number of arrivals, persons reported exiting without applying for MRC and stated they did not know that they could apply prior to exiting. In 2024, the number of arrivals were even lower than the previous year but again not all persons applied for MRC prior to exiting mainly due to staffing issues as a SWS officer is not present daily.⁴⁷⁸

Applying for MRC while in Pournara has led to a faster examination of applications for MRC. However, persons do not receive any assistance upon exiting the Centre and receive the first payment in cash within approximately 2 weeks and the first cheque in about 1-3 months. The SWS schedule a visit at their place of residence in order to verify their address and if they are not found living there, the MRC are terminated or suspended until they present a new valid address, which in many cases applicants are not able to do.⁴⁷⁹

Persons who have exited without applying or who were not in Pournara, an application for MRC must be submitted to the Social Welfare Services in the district they are living.

Overall, delays in the examination of the application and granting of financial assistance are still observed. Currently, the average processing time of applications for material reception conditions at the SWS is approximately 1-3 months, depending on the district.⁴⁸⁰ This is due to various administrative difficulties, including: staff shortages; delays in conducting home visits to verify address by SWS; demanding paperwork and requirements for documentation to be gathered and submitted by beneficiaries; and difficulties experienced by the applicants in physically reaching and meeting with Welfare Officers. If an application for material assistance is submitted without all the necessary documentation applicants will not receive rent allowances and the foreseen amounts for bills and daily expenses will also be deducted.

The revised application for MRC is available in English, French, Greek, Somali, Kurdish, Farsi and Arabic and it collects basic information for the applicant and the household members as well as information on

⁴⁷⁶ UNHCR, *Thematic Fact Sheet on Reception in Cyprus with updates through December 2024*, available [here](#).

⁴⁷⁷ Information provided by Cyprus Refugee Council.

⁴⁷⁸ Information provided by Cyprus Refugee Council.

⁴⁷⁹ Information provided by Cyprus Refugee Council.

⁴⁸⁰ Information provided by Cyprus Refugee Council.

spoken languages and the need for a translator.⁴⁸¹ The Social Welfare Services will not accept the application unless a copy of the confirmation of submission of application for asylum, a copy of the Alien Registration number (ARC) and - if more than 9 months since the date of the application for asylum has passed - a confirmation of registration with the Labour Office as unemployed is attached to the application. Regarding the **criteria** to access MRC, from 2016 until 2022, the criteria and level of MRC were not included in the Law or in a Ministerial decision but only in the application used in practice for MRC.⁴⁸² In 2022, a new Ministerial Decision which determines the criteria and level of MRC was issued,⁴⁸³ as well as a new application form.⁴⁸⁴ According to the new Ministerial Decision, to become a beneficiary of MRC the person must be an applicant for international protection, for whom MRC cannot be covered in Reception and/or Accommodation Centres, who lives in the areas controlled by the Republic of Cyprus and both the applicant and their family members meet the following conditions:

- ❖ No member of the applicant's family is employed.
- ❖ In the event that the applicant or any member of their family is employed, the family may continue to receive assistance as long as the monthly income is less than the total amount of assistance to which the family is entitled.
- ❖ According to the Decree of the Minister of Labour and Social Insurance, dated 29/09/2023,⁴⁸⁵ applicants of international protection have the right to access the labour market after nine months from the date of submission of the application for international protection. Once applicants acquire the right to work, they should:
 - (a) be registered as unemployed in the Register of the Public Employment Service;
 - (b) accept work in specific sectors that have been determined, based on the Decree of the Minister of Labor and Social Insurance.
 - (c) participate, if invited, in professional training programs and/or educational courses, and Greek language classes
 - (d) accept the provision of personalised approach services by qualified employment advisers of the Public Employment Service;
 - (e) accept meetings and visits to their place of residence for on-site evaluation of their situation by the competent Social Welfare Officers regarding the planning of activities for their vocational and counselling guidance, psychosocial support and social reintegration.

The Ministerial Decision also states that applicants for international protection who have disabilities, are unable to work or are over 63 years of age, do not have the obligation to register with the Public Employment Service (Labour Office).

Regarding family members the Ministerial Decision states that for the purposes of examining an application for MRC, the status of an applicant for international protection is also held by the applicant's family members who reside with them, regardless of whether they are included in the applicant's application for international protection or whether they have submitted a separate application for international protection. Family members means any of the following members of the applicant's family unit who reside in the government-controlled areas:

- (a) The applicant's spouse or partner, with whom the applicant lives and shares a residence for accommodation purposes.
- (b) the minor and unmarried children either of the applicant, or of the applicant and his/her spouse or according to paragraph (a) of his/her partner.
 - (i) Unmarried children still attending school.

⁴⁸¹ Deputy Ministry of Social Welfare, available in Greek [here](#).

⁴⁸² For further information, see AIDA, Country Report: Cyprus, 2021 Update, April 2022, available at: <https://bit.ly/3NBxOCp>.

⁴⁸³ Ministerial Decision 93.451, 28 July 2022, available in Greek at: <https://bit.ly/3Yrn5wN>.

⁴⁸⁴ The application form, together with other relevant application forms, is available in Greek at: <https://bit.ly/4aE93i7>.

⁴⁸⁵ Ministerial Decision 312/2023, 29 September 2023, pursuant to art. 9Θ of the Refugee Law available in Greek, at: <https://tinyurl.com/ycycztjy>.

- (ii) Unmarried children who have reached the age of eighteen (18) and are searching for employment even if they submitted a separate application for international protection.
- (iii) Unmarried children between eighteen (18) and twenty-three (23) years of age, as long as they receive regular education.

There are no particular provisions about asylum applicants having resources already upon requesting material reception conditions. However, there are incidences reported in relation to resources that lead to termination of the benefit of material reception conditions (see [Reduction of withdrawal of receptions conditions](#)).

2. Forms and levels of material reception conditions

Indicators: Forms and Levels of Material Reception Conditions

1. Amount of the monthly financial allowance granted to asylum applicants.

(in original currency and in €):

❖ Single adult	€ 214 - 361
❖ Family of 5 or more	€ 1,023 - 1,155

Within the framework of the Refugee Law, material reception conditions refer to accommodation, food, clothing, and a daily allowance.⁴⁸⁶ Material assistance can be provided in kind and/or in vouchers, and if this is not possible, through financial aid, as it is currently the case.⁴⁸⁷ In practice, after exiting **Pournara** First Reception Centre, and if there is no vacancy in the Reception Centre, which is the case most of the time, asylum applicants are allowed to submit an application to the SWS for financial allowance.

In 2022 according to the new Ministerial Decision,⁴⁸⁸ material reception conditions include:

- 1) Financial assistance to cover basic needs (food, clothing and footwear)
- 2) Financial assistance to cover minor expenses, including electricity and water costs. The amount of the financial assistance to cover such expenses is determined according to the applicant's place of residence.
- 3) Financial assistance to cover rent allowance to the owner of a property.
- 4) Advance payment of rent.

In practice, advance payment of rent is typically provided to selected vulnerable cases. to all cases.⁴⁸⁹

Form of distribution of MRC

For residents in the community entitled to reception conditions, since October 2020, the allowances for food, clothing, utility bills, and minor expenses are provided by cheque sent to the registered address of the person instead of vouchers as was done before. The rent allowance is payable directly to landlords. In November 2020, SWS sent a form to recipients of MRC asking them to submit their IBAN and authorise SWS to deposit the allowances directly in their accounts rather than by cheques. However as of 2024 this has yet to be implemented. ⁴⁹⁰.

Granting material conditions by cheque to an asylum applicant requires them to have a bank account opened in their name, which was not required for vouchers. Complaints are often received concerning the ability of asylum applicants to open an account, and thus their ability to access basic rights.⁴⁹¹ The main issues identified concern the documents required by banks (such as rent contracts containing certified signatures by two Cypriot citizens); delays in concluding the procedures; discrepancies in bank

⁴⁸⁶ Article 2 Refugee Law.

⁴⁸⁷ Article 9IB Refugee Law.

⁴⁸⁸ Ministerial Decision 93.451, 28 July 2022, available at: <https://bit.ly/3Yrn5wN>.

⁴⁸⁹ Information provided by the Cyprus Refugee Council and Caritas Cyprus.

⁴⁹⁰ Ibid.

⁴⁹¹ Based on information provided by Caritas Cyprus and Cyprus Refugee Council.

account opening policies between branches/officers; and the requirement for the applicant to speak good Greek or English. Furthermore, applicants are sometimes requested to submit clear criminal record, often issued by the country of origin.

Regarding the issue of accessing bank accounts, it should be noted that the Law⁴⁹² and relevant Directions⁴⁹³ issued by the Central Bank, include the right of accessing basic bank accounts without any discrimination against consumers legally residing in the European Union including asylum applicants, for reasons such as their nationality or place of residence. Specifically in the case of asylum applicants, according to the Directions of the Central Bank, the ARC and the Confirmation for the submission of an application for International Protection issued by the Asylum Service⁴⁹⁴ are the required documents for opening a bank account. It is also indicated that if a credit institution has valid doubts regarding the originality of the documents, it should not contact any governmental agency or credit institution from the country of origin of the person but an appointed department in Cyprus. To verify the address of an applicant, credit institutions may visit the applicants' residence or use other documents, such as a recent utility bill,⁴⁹⁵ documents issued by the State (Confirmation Letter, Alien book), or an affidavit to confirm this.⁴⁹⁶

Despite the Law and relevant Directions issued by the Central Bank, access to bank accounts continues to be an issue. Following interventions by UNHCR and NGOs, as well as meetings between Central Bank, Asylum Service and Social Welfare Services, the situation improved. A sector wide Circular/Guidance Note was issued by Central Bank on 12 November 2020, providing clear guidelines to all banks regarding the documentation needed by asylum applicants. Furthermore, the SWS began issuing a letter for purposes of opening an account for asylum applicants, confirming that the applicant is a recipient of material reception conditions, while the Asylum Service provides confirmation of residence status for applicants when needed. However, it is also important to note that the abovementioned consultations mainly involved 4 private Banks in Cyprus, which were willing to engage in the dialogue, out of the 29 registered credit Institutions in Cyprus.⁴⁹⁷

Although improvements have been observed, various challenges remain, such as the time needed for processing applications for opening or verifying an account, which can span from 2-3 weeks to 3 months, or more. During 2024, account verification process for asylum seekers was often combined with suspension of all transactions, an issue on which progress was observed towards the end of the year. Other challenges include the request towards some clients to submit a criminal record issued by their country of origin (e.g., Sudan) and refusals/obstacles to provide services to persons coming from countries where sanctions apply.

Level of material assistance

The Refugee Law does not set the amount of material assistance provided to asylum applicants. It refers to assistance that would ensure “an adequate standard of living capable of ensuring their subsistence and to protect their physical and psychological health”.⁴⁹⁸ It also provides that the amount of the assistance provided should be in accordance with the amounts granted for securing an adequate living standard to nationals.⁴⁹⁹ Asylum applicants may be subjected to less favourable treatment compared to Cypriot

⁴⁹² Law Regulating the Compatibility of Fees, Payment Account Switching, and Access to Payment of 2017, available in Greek at <http://bit.ly/3rOCarV>.

⁴⁹³ Cyprus Central Bank, *Παρεμπόδιση νομιμοποίησης εσόδων από παρανομες δραστηριότητες και χρηματοδότησης της τρομοκρατίας - Οδηγία προς τα Πιστωτικά Ιδρύματα σύμφωνα με το αρ.59(4) των Περί της Παρεμπόδισης και καταπολέμησης της Νομιμοποίησης Εσόδων από παράνομες δραστηριότητες Νόμων του 2007 Έως 2018*, February 2019, available in Greek at: <https://bit.ly/3eVlxXF>.

⁴⁹⁴ Article 143, *ibid*.

⁴⁹⁵ Article 126, *ibid*.

⁴⁹⁶ Article 136, (i) and (ii), *ibid*.

⁴⁹⁷ Information provided by Cyprus Refugee Council.

⁴⁹⁸ Article 9IA(1) Refugee Law.

⁴⁹⁹ Article 9IB(2)(a) Refugee Law.

citizens, especially when the amounts granted to the latter aim to secure a living standard which is higher than the one determined in the Refugee Law for asylum applicants.⁵⁰⁰

The level of material reception conditions provided to asylum applicants in the community does not ensure a dignified standard of living. This concern has been repeatedly raised since 2019 by NGOs, UNHCR,⁵⁰¹ the Ombudsman's Office,⁵⁰² and the Commissioner for Children's Rights.⁵⁰³ However, as of 2024, still no progress has been noted and the level of MRC is considered as one of the most serious gaps in the asylum system.⁵⁰⁴ As a result, many asylum applicants, including families with young children, live in conditions of destitution and rely heavily on charities to cover basic needs, such as food and other basic items. The same applies for housing, as the sharp increase of rent in urban areas in recent years is not compensated by the financial allowances provided to cover rent and the absence of social housing policy has resulted in increased numbers of homeless people and high numbers of asylum applicants living in squalor conditions.⁵⁰⁵

In 2019, and following a Ministerial Decision, the amounts granted for covering material reception conditions had been revised upwards, but remain low.⁵⁰⁶ In 2022, the new Ministerial Decision⁵⁰⁷ introduced lower grants for electricity, water and minor expenses for asylum applicants who do not submit a rental agreement. No developments were noted in 2023 and 2024, with the amounts remaining low and the material conditions themselves still not permitting a dignified standard of living.

The detailed breakdown of the amounts granted to asylum applicants is as follows:

Number of persons	Food, clothing and footwear	Allowance for electricity, water and minor expenses (with rental agreement)	Allowance for electricity, water and minor expenses (with no rental agreement)
1	€ 186	€ 75	€ 28
2	€ 279	€ 100	€ 37
3	€ 372	€ 140	€ 52
4	€ 465	€ 170	€ 63
5	€ 558	€ 200	€ 74

⁵⁰⁰ Article 9IB(2)(b) Refugee Law.

⁵⁰¹ See e.g., UNHCR, *UNHCR Cyprus' Integration Conference Results in Public Call to Action*, 20 December 2019, available at: <https://bit.ly/2w3L91c>; Open Discussion Event, organised by UNHCR and University of Cyprus, April 2019, press release available in Greek at: <https://bit.ly/2Vm4Zil>; UNHCR and University of Nicosia, *The living conditions of asylum-seekers in Cyprus*, May 2018, available at: <https://bit.ly/2lWKnsM>; UNHCR, *Homelessness is becoming an increasing issue for asylum-seekers in Cyprus*, 23 April 2018, available at: <https://bit.ly/39TtzvR>; UNHCR, *Asylum-seekers complain to UNHCR about their deteriorating living conditions*, 15 December 2017, available at: <https://bit.ly/33mnfdZ>; 'UNHCR, *Η ζωή αιτητών ασύλου στην Κύπρο - Μαρί **, μητέρα και μηχανικός αυτοκινήτων, 10 August 2017, available in Greek at: <https://bit.ly/2lLghG1>; UNHCR, *Λάουρα **, επιστήμονας και τραγουδοποιός, 24 May 2017, available in Greek at: <https://bit.ly/2von7hr>; UNHCR, *Η ζωή αιτητών ασύλου στην Κύπρο - Άγια**, Νεαρή μητέρα από τη Σομαλία, 9 May 2017, available in Greek at: <https://bit.ly/38SnPBI>.

⁵⁰² See Ombudsman, *Έκθεση της Επιτροπής Διοικήσεως και Προστασίας Ανθρωπίνων Δικαιωμάτων σε σχέση με το θεσμικό πλαίσιο που ρυθμίζει την κάλυψη των υλικών συνθηκών υποδοχής των αιτητών ασύλου που διαμένουν εκτός του Κέντρου Υποδοχής*, 6 June 2019, available in Greek at: <https://bit.ly/2lY494l>.

⁵⁰³ See, Commissioner for Children's rights, *Έκθεση Επιτροπής, αναφορικά με τις υλικές συνθήκες υποδοχής που παραχωρούνται στους Αιτήτες Ασύλου που δεν υπάρχει δυνατότητα φιλοξενίας σε κέντρα υποδοχής και της μεταχείρισης ευάλωτων προσώπων*, August 2019, available at: <https://bit.ly/2walQtx>.

⁵⁰⁴ Information provided by Cyprus Refugee Council

⁵⁰⁵ UNHCR et al., *Joint Statement on the growing problem of homelessness among asylum-seekers in Cyprus*, 9 May 2018, available at: <https://bit.ly/2Uk557g>.

⁵⁰⁶ See Cyprus Government, *Απόσπασμα από τα Πρακτικά της Συνεδρίας του Υπουργικού*, Decision number 87.433, 6 May 2019, available in Greek at <https://bit.ly/3b9dT8b>.

⁵⁰⁷ Ministerial Decision 93.451, 28 July 2022, available in Greek at: <https://bit.ly/3Yrn5wN>.

Number of persons	Allowance for rent					Total amount of all assistance granted with/without rental agreement
	Nicosia	Limassol	Famagusta	Larnaca	Paphos	
1	€ 100	€ 100	€ 100	€ 100	€ 100	€ 214 - 361
2	€ 200	€ 218	€ 146	€ 174	€ 146	€ 525 - 597
3 - 4	€ 290	€ 317	€ 211	€ 252	€ 211	€ 723 - 829
5+	€ 364	€ 397	€ 265	€ 315	€ 265	€1,023 - 1,155

In comparison, for nationals / EU citizens and BIPs the amount to cover basic needs is regulated by the Guaranteed Minimum Income (GMI) law and is set at € 480 (in cash) per month for one person, while the corresponding amount for asylum applicants is € 261. The foreseen monthly rent allowance for nationals/EU citizens and BIPs when it comes to a single person or a couple varies between € 161.70 and € 242 depending on the area where the person resides and increases to € 235.20 – € 352.80 for a family of three. The exact amount may be further adjusted without a cap due to the presence of special needs and the exact composition of the household.

For asylum applicants, and regardless of the actual rent cost, the rent allowance provided is set at € 100 for single persons and between € 146 – € 218 for two persons. It is increased to € 211 – € 317 for a family of three or four members and can reach up to a maximum of between € 265 – € 397 in case of families of four-five members and above, without further adjustment. Non-related persons sharing a residence are considered as a household for purposes of calculating rent allowances, and they are also entitled to the same total amounts per residence. Although an in advance payment of rent is foreseen in the 2022 Ministerial orders, such payments are typically provided in limited cases of highly vulnerable persons.⁵⁰⁸

The maximum amount of material assistance for a household of five or more asylum applicants is capped at €1,155 (out of which € 265 – € 397 is for rent), irrespective of the number of family members. The rent allowance is directly payable to the landlords upon the submission of necessary documentation (e.g., IBAN, confirmation from Inland Revenue Department) as well as documents submitted by applicants i.e., taxation stamps for agreements exceeding € 5,000, signatures and ID numbers of two witnesses, a declaration by the property owner confirming the number of residents per room and the availability of rent/water in the premises as well as copy of the property title. In the case of nationals, under the new Guaranteed Minimum Income legislation, rent allowance is also paid directly to landlords and the possibility of further adjustments, depending on the needs of the household, is foreseen.

The inadequacy of MRC to cover the standard cost of living and housing in Cyprus can also be observed when looking at the difference between the rent allowance for nationals and for asylum applicants, which further undermines the obligation to ensure dignified living conditions for asylum applicants. Such a difference is also evident in the allowances for daily expenses, food, and clothing. Property analysts and other stakeholders report an annual increase of 18% in rent prices in 2018,⁵⁰⁹ 14% in 2019,⁵¹⁰ and after a slight decline in 2020, an increase of 5,1% in 2021,⁵¹¹ 19,6%⁵¹² during 2022, 12,2% in 2023⁵¹³ and 10.6% in 2024⁵¹⁴ This trend continues to raise concerns as to whether the amounts for asylum applicants are adequate to secure appropriate housing. The combination of a highly restrictive policy relating to the

⁵⁰⁸ Information provided by Cyprus Refugee Council.

⁵⁰⁹ RICS, Cyprus Property Price Index Q2 2018.

⁵¹⁰ RICS, Cyprus Property Price Index 2019 Q4.

⁵¹¹ RICS, Cyprus Property Index 2021, available at: <https://bit.ly/3qMVVST>.

⁵¹² RICS, Cyprus Property Index 2022 Q4, available at: <https://bit.ly/3kJA8f4>

⁵¹³ RICS Cyprus Property Index with KPMG in Cyprus, available at: <https://tinyurl.com/bdf2rjnh>

⁵¹⁴ RICS Cyprus Property Index with KPMG in Cyprus Q3/2024: available [here](#).

level of allowance and a sharp increase in rent prices has resulted in an alarming homelessness problem.⁵¹⁵⁵¹⁶

Asylum applicants are not entitled to a series of social benefits granted to nationals such as: child benefit; student grants, given to nationals who secure a position in university and the single parent benefit. Asylum applicants are also excluded from the grants/benefits of the Department for Social Inclusion of Persons with Disabilities, under the Ministry of Labour and Social Insurance, which include various benefits and services aimed to help disabled persons, notably a special allowance for blind people; mobility allowance; financial assistance schemes for the provision of technical means; instruments and other aids; and care allowance schemes for paraplegic/quadruplegic persons etc.

3. Reduction or withdrawal of reception conditions

Indicators: Reduction or Withdrawal of Reception Conditions

1. Does the law provide for the possibility to reduce material reception conditions?
☒ Yes ☐ No
2. Does the legislation provide for the possibility to withdraw material reception conditions?
☒ Yes ☐ No

According to the Law, reception conditions may be reduced or withdrawn by a decision of the Asylum Service following an individualised, objective, and impartial decision, which is adequately justified and announced to the applicant.⁵¹⁷ Such a decision is subject to the provisions of the Convention on the Rights of the Child as the latter is ratified and incorporated into national legislation.⁵¹⁸ However, there are no guidelines regulating the implementation of that possibility and, in practice, the enjoyment of reception conditions by children is dependent upon their parents' eligibility to access them.

Grounds for reduction, withdrawal, termination of reception conditions

Under the Refugee Law, reception conditions may be reduced or – in exceptional and duly justified cases – withdrawn by the Asylum Service, where:⁵¹⁹

- (a) The applicant's place of residence has been determined by a decision issued by the Minister of Interior for reasons of public interest or public order when necessary for the swift processing and effective monitoring of the person's application and such a decision has been breached;
- (b) The applicant fails to comply with the obligation to timely inform the authorities with regards to changes of their place of residence;
- (c) For a period longer than two weeks, and without adequate justification, the applicant does not appear for a personal interview or does not comply with a request of the Asylum Service to provide information concerning the examination of the asylum application;
- (d) The applicant has submitted a subsequent application;
- (e) The applicant has concealed financial resources;
- (f) The applicant has not lodged an application "as soon as reasonably practicable". The Refugee Law only allows for reduction of reception conditions in such a case. However, monitoring is required in order to assess how the provision is applied.

In addition, in the case of people residing in the community, the Social Welfare Service can also reject, in full or in part, an application for reception conditions, or can terminate in full or in part, the provision of

⁵¹⁵ UNHCR et al., *Joint Statement on the growing problem of homelessness among asylum-applicants in Cyprus*, 9 May 2018, available at: <https://bit.ly/2Uk557g>; see also FRA, *Migration: Key Fundamental Rights Concerns*, available at: <https://bit.ly/40F4kaD>.

⁵¹⁶ UNHCR Cyprus, *Reception Factsheet*, April 2024, available [here](#).

⁵¹⁷ Article 9KB(1)(a) Refugee Law.

⁵¹⁸ Article 9KB(1) Refugee Law.

⁵¹⁹ Article 9KB(1)(a) Refugee Law.

reception conditions, if the applicant has sufficient resources to secure their subsistence and provide an adequate standard of living from a health perspective.

According to the latest Ministerial Decision,⁵²⁰ persons cease to be entitled to the provision of Material Reception Conditions when they do not meet the following requirements:

- ❖ When they are granted international protection status by the Asylum Service (Recognised Refugee status, Subsidiary Protection status).
- ❖ When the status of an applicant for international protection ceases. Specifically, the status of the applicant is valid until the date upon which the decision of the Head of the Asylum Service becomes enforceable and is notified to the applicant and the deadline for filing an appeal against the decision of the Head of the Asylum Service has expired. The status of the applicant continues to apply when they appeal to the Administrative Court of International Protection, against the decision taken by the Head of the Asylum Service until the final decision of the Administrative Court is issued. In case of a negative decision within the regular procedure with the normal procedure, the deadline for filing an appeal is 30 days. In case of a negative decision within the accelerated procedure, manifestly unfounded applications, withdrawals and for the other categories mentioned in article 12A of the law, the deadline for filing an appeal is 15 days.
- ❖ When they leave the areas controlled by the Republic of Cyprus for any period.
- ❖ When placed in detention. In cases where the detained person is a family member, the provision of the material reception conditions of the family will continue without taking into account the proportion of the detained person.
- ❖ When they refuse a visit by the Director of Social Welfare Services (including an authorised representative) to the place where they live or refuse to provide information in relation to any issue that will affect any decision that will be made during their assessment or re-assessment of the coverage of the material reception conditions.
- ❖ When they have concealed financial resources and has therefore unfairly benefited from the material reception conditions.
- ❖ When they refuse a job offer twice for reasons which are not considered objectively acceptable / justified. In case of refusal by them or another member of his family who can work, they will be deleted from the register of the Public Employment Service and will consequently lose any assistance they are entitled to by virtue of this capacity. The right to submit a new application after the applicant is considered voluntarily unemployed is granted after 4 months.
- ❖ When the applicant is employed, in the case of a family, the income from work should be less than the total amount of assistance to which the family is entitled, based on the specified amounts of the Material Reception Conditions. Otherwise, the Material Conditions of Reception are terminated.

Until 2022, when asylum applicants were able to secure employment, the provision of MRC was immediately terminated without taking into account the sufficiency of the remuneration, again forcing asylum applicants into destitution. The Ministerial Decision of 2022 specified that if a member of the household is working and the income is lower than the foreseen MRC amounts, the family may be eligible to receive the rest of those amounts. This provision was put in effect in 2023 and continued during 2024. MRC are terminated by the SWS when an asylum applicant and/or their spouse is deemed “wilfully unemployed”. A person can be deemed wilfully unemployed in instances where they reject a job offer, regardless of the reason: not being able to immediately take up work because it is located in a remote place with no transportation available; not being able to move to a new property near work due to lack of funds; not being able to secure a written answer from an employer regarding the outcome of a referral; not being able to immediately secure childcare due to lack of funds –which is particularly true for single-parent households- etc.

Two “unjustified” denials of employment are required to terminate the MRC. There is no procedure in effect to challenge such a decision, which often results in persons and families with children falling into in

⁵²⁰ Ministerial Decision 93.451, 28 July 2022, available in Greek at: <https://bit.ly/3Yrn5wN>.

destitution. According to the Ministerial decision, the applicant needs to wait 4 months before applying again to the SWS, although in practice, the period of the ban is not strictly and uniformly upheld.

A change in the registration and servicing procedure of unemployed persons was initiated in the second half of 2021. Along with all job applicants in the country, asylum applicants are now required to register on a new online system,⁵²¹ run by the Public Employment Services under the Labour Department in order to get assistance to find work. The system requires the creation of an online account, creation/use of an email address in order to communicate and forward documentation to the Labour Officers and efficient navigation in a complex virtual environment.

Many asylum applicants,⁵²² especially those lacking experience with similar tools, persons with limited English and Greek language skills, and people without proper equipment (phones, laptops) face difficulties to register and use the system efficiently. Delays in following PES time frames for renewing labour registration online often leads to disruption or termination of MRC. The new system involves limited face-to-face interaction and beneficiaries are poorly guided to overcome practical obstacles in registering and using the new PES system.

Persons with physical or mental health issues who are unable to work are required to provide medical confirmation to be exempted from the duty of registering with the Labour Department so they can receive MRC.⁵²³

Regarding reception conditions provided in reception centers, incidents of MRC being refused or terminated for asylum applicants are rare. However, from April 2024 onwards, Syrian nationals that applied for asylum are not permitted to live in the community and receive financial assistance as part of the MRC. Initially, they were transferred from Pournara to the Reception Center in Kofinou, where they were issued with residence orders. From then on, they were allowed to leave Kofinou and reside in the community however, if they opted to do so, access to material reception conditions is reduced and, specifically, they do not have access to the financial allowance. From late 2024 onwards the option is provided before leaving Pournara to move to Kofinou or live in the community without financial assistance, with the majority opting to waive entitlements to the financial allowance and live in the community. No assessment is carried out with regards to risk of destitution.⁵²⁴

Decision-making and procedure

According to the Law, any decision regarding the reduction or withdrawal of reception conditions should be based on the particular situation of the vulnerable persons, taking into account the principle of proportionality.⁵²⁵

In practice, this provision is not implemented. Therefore, vulnerable persons residing in the community may find themselves without support. Furthermore, there is no assessment of the risk of destitution by SWS, either during the examination of the application for assistance or before a decision is issued to terminate assistance. The sufficiency and adequacy of resources that can ensure a dignified standard of living are not taken into account. This situation often forces asylum applicants into destitution. For persons who are found to have concealed details about their financial situation, usually there is no legal action taken against them on behalf of the Welfare Services, apart from the termination of their welfare file or retrieving the amounts by deducting them from future payments.⁵²⁶

⁵²¹ Public Employment Service - Online Platform, available in Greek at: <https://bit.ly/350YzwW>.

⁵²² According to information conveyed by more than 300 asylum applicants to CyRC as well as reports of other NGOs.

⁵²³ Based on information provided by Cyprus Refugee Council.

⁵²⁴ Philnews, *Suspension of asylum applications affects thousands*, 16 April 2024, available [here](#).

⁵²⁵ Article 9KB(2) Refugee Law.

⁵²⁶ Information provided by the Cyprus Refugee Council

The partial restriction of reception conditions only applies to persons not residing in a reception centre and, in particular, to persons receiving MRC from the SWS. For those persons, rent allowance can be rejected if they are not able to submit all the required documents and other required information regarding the property they are renting, which currently include (apart from taxation stamps for agreements exceeding €5,000) signatures and ID numbers of two witnesses, a declaration by the property owner confirming the number of residents per room and the availability of rent/water in the premises as well as copy of the property title.⁵²⁷ For such cases, according to the latest Ministerial Decree in 2022, the amounts allocated for bills and daily expenses are also reduced.⁵²⁸

Decisions revoking welfare aid are rarely communicated in writing. Even if provided in writing, they do not include detailed information on the reasons. The assessment is carried out by Welfare Officers. The decision can be challenged judicially before the IPAC, however no such cases have been brought before the courts, mainly due to lack of access to legal representation and legal aid (see [Regular Procedure: Legal Assistance](#)). Regarding legal aid, the Law allows persons to apply for legal aid against such decisions,⁵²⁹ however as in the asylum procedures a ‘means and merits’ test has been included, according to which, an asylum applicant applying for legal aid must show that they do not have the means to pay for the services of a lawyer and that “the appeal has a real chance of success”.⁵³⁰ To date, there is no information of applications for legal aid or cases being submitted in relation to reception conditions.

People who reside in reception centres can be evicted if they do not comply with the centre’s operation rules. According to the Refugee Law, a dignified standard of living, as well as access to care and support, should be secured for all asylum applicants whose reception conditions have been reduced or withdrawn, including for persons who were evicted by the Reception Centre for breaching its rules of operation.⁵³¹ However, examples of such practice are scarce.

There has not been any limitation to the provision of reception conditions in relation to large numbers of arrivals.

4. Freedom of movement

Indicators: Freedom of Movement

1. Is there a mechanism for the dispersal of applicants across the territory of the country? ☐ Yes ☒ No
2. Does the law provide for restrictions on freedom of movement? ☒ Yes ☐ No

The Refugee Law grants asylum applicants the right to free movement and choice of residence in the areas controlled by the RoC.⁵³² Therefore asylum applicants cannot cross the “green line” to the northern areas not under the control of the RoC, although other third-country nationals who are legally in Cyprus either as visitors or under some form of residence, employment, or student permit do have the right to cross.

Asylum applicants are obliged to report any changes of living address to the authorities either within five working days or as soon as possible after changing their address.⁵³³ If they fail to do so, they may be considered to have withdrawn their asylum application, although in practice in recent years there have

⁵²⁷ Ibid.

⁵²⁸ Ministerial Decision 93.451, 28 July 2022, available in Greek at: <https://bit.ly/3Yrn5wN>

⁵²⁹ Article 6A(6) Legal Aid Law.

⁵³⁰ Article 6B(2)(b)(bb) Legal Aid Law.

⁵³¹ Article 9Δ Refugee Law.

⁵³² Article 9KB(2) and (4) Refugee Law.

⁵³³ Article 8(2)(a) Refugee Law.

been no indications of this being implemented. There is no legislative differentiation regarding the provision of MRC based on the area of residence.

The Minister of Interior may restrict freedom of movement within some the controlled areas and decide on the area of residence of an asylum applicant for reasons of public interest or order.⁵³⁴

Asylum applicants living in the community reside where they choose, with the exception of **Chloraka**, in the **Paphos** district where, according to a Ministerial Decree issued in December 2020, new asylum applicants are no longer allowed to reside.⁵³⁵ The rationale behind the decision includes reasons such as the “massive settlement of International Protection holders” in the area, resulting in “social problems” and “demographic change”. Persons originating mainly from Syria have been residing in the particular area for over 10 years, some even prior to the Syrian conflict. The number of Syrian residents has particularly increased during the last 4 years, as a result of the Syrian crisis. The Decree was issued after demonstrations were held by a number of local actors, which raised concerns over the potential for “racial alteration” of the community, due to approximately 20% of its residents being Syrians. Public discussion raised by a crime involving a Syrian resident resulted in the stigmatisation of the whole Syrian community in the area. The Decree fails to provide informed and relevant reasons for imposing the particular restrictions while it introduces a racially discriminatory rationale, contradicting the provisions of Directive 2013/33, as well as various anti-discriminatory provisions outlined by international and local legal texts. Throughout 2022 the situation remained unresolved.⁵³⁶ UNHCR, with the cooperation of Syrian residents and organised groups in the area,⁵³⁷ as well as other local initiatives,⁵³⁸ advocated for a peaceful and respectful resolution of the tension as well as reversing the negative representation in the media.

In 2023, there was a significant surge in violence against migrants in Cyprus, with incidents including pogrom-like demonstrations and violent attacks against racialised people, including migrants and refugees.⁵³⁹ The main incidents took place in Chloraka and then Limassol where migrant-owned shops were destroyed, and several people were attacked by mobs. There has also been a rise in attacks and reports of police profiling. Experts have blamed the increased mainstreaming of xenophobia in Cypriot politics and media, fuelled by the spread of disinformation and the mismanagement of the large number of people trying to reach Europe.⁵⁴⁰ Violence against migrants continued in 2024, including frequent racist attacks especially against delivery-persons,⁵⁴¹ hate speech,⁵⁴² police profiling,⁵⁴³ incidents of police entering private accommodation to identify undocumented persons.⁵⁴⁴

The European Commission on Racism and Intolerance (ECRI), in its latest report published on Cyprus in 2023, recommends that the authorities establish a comprehensive monitoring system for hate speech

⁵³⁴ Article 9E(1) Refugee Law.

⁵³⁵ Ministerial Decree K.Δ.Π. 583/2020 pursuant to Article 9E(1)(a)(ii) of the Refugee Law, available at: <http://bit.ly/3tGMgMS>.

⁵³⁶ Philenews, *Community leader of Chloraka calls for measures and warns of mobilizations*, 5 January 2022, available in Greek at: <https://bit.ly/4aVf2Pu>; Dialogos, *With slogans "Cypriots first" and not "Fake refugees" a group protested in Chloraka*, 5 January 2022, available in Greek at: <https://bit.ly/3ubq932>.

⁵³⁷ UNHCR, *Refugee integration programs can enhance social cohesion in Chloraka, Pafos*, 20 July 2020, available at: <https://bit.ly/3qpRYU6>; Politis, *Syrian volunteers are restoring a listed building in the Municipal Market*, 18 February 2022, available in Greek at: <https://bit.ly/3UkNqh6>.

⁵³⁸ Dialogos, *AKEL Paphos: Initiative to solve problems after the recent events in Chloraka*, 14 January 2022, available in Greek at: <https://bit.ly/37Ko6v7>; KISA, *KISA denounces racism, violence and hate speech against Syrian refugees in Chloraka*, 11 January 2022, available in Greek at <https://bit.ly/36CtpMG>.

⁵³⁹ ECRE Weekly Bulletin of 8 September 2023, *Racist violence against migrants in Cyprus*, available at: <https://bit.ly/48rcNIE>. Amnesty International, *Cyprus: Authorities must protect migrants and refugees from racist attacks*, 6 September 2023, available at: <https://bit.ly/47aEiil>

⁵⁴⁰ France 24, *Cyprus migrants face wave of attacks as hostility brews*, 12 September 2023, available at: <https://bit.ly/3RyTYWZ>

⁵⁴¹ Cyprus Mail, *22 attacks on delivery drivers so far this year, Limassol police say*, 20 November 2024, available [here](#).

⁵⁴² Philenews, *Hate speech reaches dangerous levels in Greek-language internet content, study finds*, 20 January 2025, available [here](#).

⁵⁴³ Philenews, *Cyprus Police urged to avoid racial profiling*, 6 September 2024, available [here](#).

⁵⁴⁴ Alphanews, *New operation to sweep up illegal aliens*, 24 November 2024 available in Greek [here](#).

incidents, involving the police, the prosecution service, the courts, the equality body and relevant civil society organisations, especially those supporting refugees, asylum applicants, and migrants. Furthermore, ECRI recommends that the authorities step up their efforts in encouraging public figures, in particular high-level officials and religious leaders, to firmly and promptly condemn the use of racist and other forms of hate speech, use counter-speech and alternative speech, and promote intergroup understanding.⁵⁴⁵ No progress was noted in 2024 in relation to the ECRI recommendations.

Asylum applicants in **Pournara** and in the closed section of **Limnes** do not have freedom of movement (see [Conditions in reception facilities](#)).⁵⁴⁶

B. Housing

1. Types of accommodation

Indicators: Types of Accommodation

1. Number of reception centres:⁵⁴⁷ 3 + 4 UASC shelters
2. Total number of places in the reception centres: 2,700 (Pournara, Kofinou and Limnes Centres) and 90 at UASC shelters
3. Total number of places in private accommodation: Not available
4. Type of accommodation most frequently used in a regular procedure:
☒ Reception centre ☒ Hotel or hostel ☒ Emergency shelter ☒ Private housing ☐ Other
5. Type of accommodation most frequently used in an accelerated procedure:
 Limnes for small numbers

The following types of accommodation are available for asylum applicants in Cyprus:

- ❖ **First Reception Centre, Pournara at Kokkinotrimithia** - The reception centre located in Kokkinotrimithia, on the outskirts of Nicosia, was originally established in 2014 as a tented facility with a 350-person capacity with EU funding to help deal with increased arrivals from Syria and was envisaged only to provide 72-hour emergency accommodation to newly arrived asylum-applicants. From 2020 onwards, asylum applicants that have arrived in the country in an irregular manner are referred to Pournara. The services provided in the Centre include identification, registration, and lodging of asylum applications as well as medical screenings and vulnerability assessments. In 2023, the average duration of stay was 30-40 days for adults and 80 days for UASC. In 2024, the duration of stay was similar to 2023, however there was a significant number of cases where the duration of stay for adults and families reached 3 months and for UASC 4 months.⁵⁴⁸ During their stay in the Centre asylum applicants are not permitted to exit.

⁵⁴⁵ European Commission on Racism and Intolerance, *Sixth Cycle Report on Cyprus*, 7 March 2023, available at: <https://bit.ly/3tw7SBb>.

⁵⁴⁶ For more information regarding extended stay at Pournara during 2020 and 2021, see respective Updates of the AIDA Country Reports on Cyprus, available at: <https://bit.ly/4aivBFw>.

⁵⁴⁷ Includes centres used for registration, long term stay and pre-removal.

⁵⁴⁸ Commissioner for Administration and Protection of Human Rights (Ombudsman), *Report on the visit on February 21, 2025 to the "Pournara" Temporary Reception and Hospitality Center for migrants Immigrants in Kokkinotrimithia*, ΕΜΠ. 8 January 2025, available [here](#).
 Kathimerini, *In Pournara, 27 unaccompanied minors for over 90 days*, 25 February 2025, available in Greek [here](#).

- ❖ **Kofinou Reception Centre for Applicants of International Protection** – The main Reception Centre, located in the village of Kofinou some 40km from Nicosia, was expanded in 2014 to have a 400-bed capacity. The Centre has been operating at its maximum capacity since January 2016. Kofinou Reception Centre is the only Centre that provides accommodation for the entire duration of the asylum procedures and which permits freedom of movement. Preparations to increase the capacity of the Centre were initiated in 2022 with a new section was completed in 2023. Works continue and the areas under renovation are expected to become available during 2025.
- ❖ **Community - Private accommodation** – The main form of accommodation used by asylum applicants is private accommodation secured independently, in all areas of Cyprus. There are no standards or conditions regulated for rented accommodation in Cyprus. Therefore, asylum applicants living in private accommodation may often be living in appalling conditions.⁵⁴⁹ Asylum applicants are expected to find accommodation on their own and there are no services available to refer persons to suitable accommodation or assist persons to identify and secure accommodation, including vulnerable persons and families with children, with the exception of an extremely few cases where the SWS assist. Indicatively, at the end of 2024 there were approximately 20,000 asylum applicants in the country whereas the total capacity of centres during the asylum procedures is approximately 1,400 persons.

In 2024, the UN Economic and Social Council raised concerns about reports of a deficit of affordable homes and that migrants and refugees face a heightened risk of exploitative practices by landlords and homelessness. The Committee recommended that the State party take immediate measures to address the housing situation, including by prioritizing funding for the construction of new and affordable housing units, strengthen oversight and enforcement mechanisms to prevent exploitation by landlords and reduce the risk of homelessness, including for migrants and refugees.⁵⁵⁰

- ❖ **Accommodation for UASC** – There are a number of accommodation arrangements for UASC, operated by a number of stakeholders. From 2020 onwards, unaccompanied children are referred to the **Pournara** First Reception Centre upon arrival for registration. Children under the age of 12 will most probably be immediately placed in the youth homes operated by the SWS for all children under their guardianship (nationals, EU nationals, third country nationals (TCNs)) and some of them are subsequently placed in foster families following relevant procedures. However, such ages of UASC are very rare in Cyprus. UASC between 13 -18 after registration is completed will exit Pournara and are accommodated in shelters. UASC between the ages of 16-18 can be placed in one of the existing semi-independent living arrangements.

In 2022 due to the increase in arrivals of UASC and lack of capacity to house them in the UASC shelters, hotels have been used as a temporary accommodation measure. The conditions in the hotels are not considered up to standard.⁵⁵¹ The use of hotels continued in 2023 and for most of in 2024, by early 2025 all hotels ceased operations for this purpose.⁵⁵²

Reception/Pre-removal Centre at Limnes - The Centre was built in a remote area, at Limnes, in Larnaca district, with the purpose to host applicants whose applications for asylum are examined under the accelerated process and enter the return procedure, with capacity for 800

⁵⁴⁹ Based on reports from asylum applicants to Cyprus Refugee Council social advisors and home visits carried out by the advisors.

⁵⁵⁰ UN Committee on Economic, Social and Cultural Rights, *Concluding observations on the seventh periodic report of Cyprus*, October 2024, available [here](#).

⁵⁵¹ Commissioner for Child's Rights, Memorandum of the Commissioner for the Protection of the Rights of the Child for the discussion on "The government's actions to find a suitable space for the creation of adolescent immigrant protection structures, as an obligation of the state stemming from the Recovery and Resilience Plan" at the Parliamentary Committee on Interior, on 23/11/2023' available [here](#)

⁵⁵² Information provided by SWS.

persons. It was also announced that a predeparture centre for rejected asylum applicants would be established next to the reception centre to facilitate their returns. The Centre began operating at the end of 2021 with small groups of rejected asylum applicants being transferred to Limnes from Pournara. In July 2023, the Centre was closed due to the sub-standard conditions and temporarily moved into a section in Kofinou Reception Centre. Limnes Centre is undergoing a complete re-structuring which is expected to be completed in 2025 while operations are expected to commence in 2026.⁵⁵³ The cost of building reception facilities and performing subsequent infrastructure works and refurbishments is covered, for the most part or fully, by EU funds.⁵⁵⁴

In 2024, the EUAA provided Cyprus national reception authorities with 94 containers, including 86 for accommodation use and 8 to be used for other reception and asylum use.⁵⁵⁵

2. Conditions in reception facilities

Indicators: Conditions in Reception Facilities

1. Are there instances of asylum applicants not having access to reception accommodation because of a shortage of places? ☒ Yes ☐ No
2. What is the average length of stay of asylum applicants in the reception centres? Not available
3. Are unaccompanied children ever accommodated with adults in practice? ☒ Yes ☐ No

2.1. First Reception Centre, Pournara

The Emergency Reception Centre (Pournara) was converted into a First Reception Centre. In 2019, the Centre underwent construction to upgrade the existing infrastructure by replacing tents with prefabricated constructions. Since 2020, asylum applicants who arrive in the country in an irregular manner are referred to the Centre. The services provided in the Centre include identification, registration, and lodging of asylum applications as well as medical screenings and vulnerability assessments. The medical test includes tuberculosis screening (Mantoux test), HIV, and Hepatitis. From late 2022 onwards, residents can also submit their application for material reception conditions for when they exit and reside in the community, however due to staffing and organisational issues, not all persons are given access to this procedure and persons still exit the centre without applying for MRC.

The nominal capacity of the Centre is 1,000 persons. From 2020 to mid-2022, it had largely surpassed its capacity, which severely impacted the general living conditions. At the beginning of 2022 there were just over 3,000 persons in the centre, however from mid-2022 year onwards the number dropped to under 2,000. Furthermore, in 2022 there were reports of an unknown number of persons residing in Pournara irregularly, who returned to the Centre after they had exited as they were unable to secure accommodation in the community.

During 2020 and 2021 access to **Pournara** was problematic.⁵⁵⁶ In early 2022, it was reported that every day on average 40-50 persons were not admitted for registration, and were forced to keep returning every morning until given access.⁵⁵⁷ In late 2022, the situation remained the same and, due to the high number

⁵⁵³ Ministry of Transport, Communications and Works, *Announcement: Tender Announcement for the Construction of a "LIMNES" Hospitality Center for International Protection Applicants and a Pre-Departure Center for persons who will be repatriated to the Menogia area of Larnaca District*, 26 January 2023, available in Greek at: <http://bit.ly/3TZaArO>; Cyprus Mail, *EU and Cyprus close to an agreement for support on migration*, 30 August 2023, available at: <http://bit.ly/3JVBE6D>.

⁵⁵⁴ Economy Today, *Δαπάνες πέραν των €100 εκατ. για Πουρνάρα και Λίμνες*, 16 June 2022, available in Greek at: <https://tinyurl.com/3mx2bjvu>.

⁵⁵⁵ Information provided by the EUAA, 14 March 2025.

⁵⁵⁶ For detailed information see the 2021 and 2022 Updates of the AIDA Country Report on Cyprus, available at: <https://bit.ly/4aivBFw>.

⁵⁵⁷ Information provided by Cyprus Refugee Council.

of arrivals, it was decided to admit a maximum of 60 persons per day to keep the numbers of persons in the Centre under control. As a result, approximately 40 persons were denied admission each day, leading to some persons entering the Centre irregularly in order to find shelter and others sleeping outdoors in front of the registration gate in the hopes of securing a position in the queue the following day. Several makeshift tents and shelters appear at times around the centre, mostly inhabited by persons awaiting registration. Persons with a passport or some form of identification document are systematically given access faster.

In 2023, the number of arrivals decreased, mostly staying below 1,000 residents in the Centre at any given time, which led to a significant improvement in access to the Centre, with most persons having access upon arrival. However, there were still instances where persons who did not present passports were denied entry by the AIU for 2-3 days. In 2024, the number of arrivals decreased once again and, from May onwards, the number of residents was below 500.⁵⁵⁸ There were no issues accessing the Center with the exception of the persons that were removed to the Buffer Zone ([See Section: Access to the territory and push backs](#)).⁵⁵⁹

Screening and identification of vulnerable persons is carried in Pournara. In early 2023, the EUAA in collaboration with the Asylum Service finalised the SoPs for the identification of vulnerable persons in Pournara. According to the new procedure, a flagging (screening) system has been introduced to prioritise individuals with vulnerabilities and only persons who are flagged as vulnerable will then undergo a vulnerability assessment by the vulnerability assessment team (see section: [Identification](#)).

Regarding conditions, in 2022, around 500 asylum-applicants were residing in prefabricated shelters with access to electricity and heating, while others were accommodated in either tents or semi-hard plastic structures without access to electricity and adequate hygiene facilities. Throughout 2022 there were no more available spaces in the housing units or tents, and residents were instructed to sleep wherever they could; persons reported that they sleep two to a bed, on the floor or even in the playground. Furthermore, in 2022 incidents of alleged sexual harassment and incidents of rape were reported by individuals accommodated in Pournara.

In 2023, due to a decrease in numbers, the vast majority of residents were accommodated in prefabricated houses with access to electricity and beds. However, in May 2023, the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) visited Pournara and found that persons held in the Centre were accommodated in severely overcrowded living conditions frequently offered only 1 to 2m² of personal living space in either prefabricated plastic containers, plastic shelters or tents. Many of these structures were in a dilapidated and worn-out condition, with broken doors and earth floors. The lack of windows and often broken air-conditioners contributed to making the containers poorly ventilated, mouldy and humid. Persons placed in containers, including single mothers and children and unaccompanied and separated children, were often forced to share beds and dirty sheets. Further, the tents and plastic containers were inappropriate for the long lengths of stays due to the lack of electricity and hot water. Persons were forced to sleep on worn out mattresses or directly on sheets placed on the ground, crammed next to each other like ‘sardines’ in unhygienic conditions. In the CPT’s view such living conditions may well amount to inhuman and degrading treatment and made recommendations to address these issues urgently.⁵⁶⁰

Infrastructural changes were planned to restructure and increase the capacity of the centre in late 2023, led by the International Organisation for Migration (IOM) and the Cypriot authorities, which will result in creating living conditions and means of support for up to 1,240 accommodation places and installation

⁵⁵⁸ Philenews, *Immigration: Pournara Center is Empty – The measures seem to be working*, 23 May 2024, available [here](#).

⁵⁵⁹ Ibid.

⁵⁶⁰ CPT, *Report to the Government of Cyprus on the visit to Cyprus carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 9 to 17 May 2023*, available [here](#).

and conformation of accommodation containers for 960 accommodation places; creating common WASH facilities, communal spaces for activities and administration offices to fulfil the needs of first reception services procedures and constructing a temporary accommodation area with 984 places, where residents will be accommodated temporarily while works in the main Center are ongoing.⁵⁶¹ In 2024, sections were completed however works continue until present.⁵⁶²

The Centre is composed of a main camp, a Quarantine Area (no longer used for quarantine purposes), four “safe zones” for vulnerable persons, and an Emergency Zone located on the perimeter. In May 2024, due to the refurbishment plans, the Quarantine Area ceased to be operational and all residents were moved to the Emergency Zone which is separated into sectors and housing is provided in Rub Halls (tent-like structure). Single men are housed in one section and families in a separate section. The Emergency Zone has new beds and new facilities including washing facilities and showers. However, residents have complained about the living conditions due to the Rub-halls which are not suitable for harsh weather conditions, considering that in the summer months temperatures reach 45 Celsius and close to 0 degrees in the night during winter months. Efforts have been made to address the cold weather by providing blankets to all resident and sleeping bags to all families, however there were still complaints about the cold. Furthermore, residents have at times complained about the lack of access to warm showering water.⁵⁶³

Regarding access to medical care, in 2024 there was only one doctor present and only on Monday-Wednesday- Friday from 09.00-13.00. Nursing staff is present on daily basis from 7.30 to 15.00. As for food, 3 meals are provided per day by a catering company and from time to time there are complaints about the quality and hygiene issues.⁵⁶⁴

Pournara includes a Safe Zone, separated into 4 Zones/sections (A, B, C and D Zones),intended to accommodate UASC, vulnerable women, and families. Regarding the admission procedure of vulnerable persons into the Safe Zone; the Coordinator of the Safe Zone receives information on vulnerable cases from the EUAA Coordinator for vulnerability assessments on a daily basis and screens and selects the persons that will be accommodated in the Safe Zone. However, there are instances where a person may be admitted into the Safe Zone when vulnerabilities are identified prior to the vulnerability assessment. Overall men are not permitted to stay in the Safe Zone, including vulnerable men and members of LGBTIQ+ groups. In exceptional cases of extreme vulnerabilities, single men may be accommodated in an area close the offices.

In 2023, families could be accommodated in the SafeZone, however in most case they would be accommodated in the main section of the Centre, as men, including fathers with children are not allowed to stay in the Safe Zone and the families choose not to be separated. However, single mothers with children who have significant vulnerabilities may be accommodated in the Safe Zone. In 2024, families were accommodated in a section of the Emergency Zone.

Safe Zones A and B are the most recently established areas, with a capacity to accommodate 88 persons, and are restricted to UASC girls (Zone A) and vulnerable women (Zone B). Regarding infrastructure, there are a total of 20 containers in the New Safe Zone; 4 are reserved for offices and 16 for accommodation of residents. Each container includes 6 beds. There is a total of 9 showers and 9 toilets. The staff allocated to Zones A and B include 1 coordinator responsible for the overall coordination, including admissions; 1 guardian from SWS, who is not present constantly and accompanies UASC to interviews; 3 EUAA staff, 2 vulnerability experts and 1 for information provision and 1 security guard who monitors the entry into the area.

⁵⁶¹ IOM, *Projects on Upgrading the First Reception Center “Pournara” in Cyprus*, available [here](#).

⁵⁶² Information provided by Cyprus Refugee Council

⁵⁶³ Ibid.

⁵⁶⁴ Ibid.

Safe Zones C & D are located in the area of the initial Safe Zone prior to the extension and therefore the oldest in terms of infrastructure. Safe Zone C accommodates UASC boys and has a total capacity to accommodate 90 persons. Regarding infrastructure there are 17 rooms with an average of 9 UASC per room and there are 2 toilets and 1 shower. Due to the high number of UASC boys, three containers from Safe Zone D were allocated to accommodate them. Safe Zone D accommodates families with small children, but male guardians (fathers) are not permitted to stay there; they are accommodated outside of the safe zone. Regarding infrastructure, there are 26 rooms with 8 persons per room and 1 out of 4 women / girls sleep on a mattress on the floor. In January 2025, UASC boys were moved out of Zone C to Zone D and Zone C is not being used.

The CPT reported, based on its 2023 visit to Pournara, that the Safe Zones provided better conditions, notably in the unaccompanied girls' area. The zones comprised several two-storey buildings, with girls' rooms offering an adequate amount of space and containing sets of bunk beds, cupboards, and lockers. Windows and air conditioners provided sufficient ventilation and light. A separate laundry room was in the Safe Zone, and the children were provided with soap, shampoo, and detergent. In contrast, the boys' Safe Zone C did not meet such standards. Safe Zone C consisted of 15 operational containers of an average size of 13 m² each, accommodating a total of 142 boys at the moment of the visit, thus offering less than 1.5 m² of living space per child. All containers were dilapidated, dirty and battered, in which the delegation found insects and other vermin. The air conditioners were broken in almost all the containers and the artificial light was not functional. Floors and windows were dilapidated and destroyed. Unlike the girls' Safe Zones, the boys did not have a laundry room, thereby forcing them to wash their clothes by hand in dilapidated wash basins. Most of the showers and toilets present on Safe Zone C were destroyed and the sinks were leaking all over the facility.⁵⁶⁵

In 2023, there were reports of some UASC who preferred to reside outside the safe zone with adults they knew to avoid conflicts emerging in the safe zone with other children accommodated there. No such practice was reported in 2024 there were no such reports.

An ongoing issue in Pournara remains the prolonged stay of UASC in the Centre, which is always longer than other residents and the lack of access to education and activities for all children while in Pournara. In early 2022, 30 unaccompanied children staged a protest due to the conditions in Pournara. The Commissioner for the Right's for the Child issued a report, reiterating the responsibility of the State under human rights law to ensure food, protection as well as acceptable health and hygiene conditions for children at the Pournara reception centre. According to the Commissioner, the children are left with one bottle of water each, that "normally has to last the entire day". Further, she described the hygienic conditions as "appalling," and noted that "around 15 people sleep in each room, usually sharing beds, resulting in children often ending up sleeping on the floor. On top of that, the roughly 300 children housed at the centre are forced to share two toilets and a single shower room".⁵⁶⁶

The intervention of the Commissioner led to a brief visit by the then President of the Republic on 14 March 2022, during which he promised to ensure that "more humane" conditions would be granted in the future, but also pointed out that the reception system's "deficiencies" are to be attributed to the high amount of new arrivals, and that the problem will be "dealt with accordingly". According to President Anastasiades, asylum applicants represent nearly 5% of the population. Cyprus has the highest number of asylum applications per capita of the 27 EU member states.⁵⁶⁷ Further, on the same day, the Interior minister Nicos Nouris announced that 92 of the 356 children at Pournara had been relocated to hotels and that alternative accommodation for an additional 150 children was being identified. According to Nouris, the

⁵⁶⁵ Report to the Government of Cyprus on the visit to Cyprus carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 9 to 17 May 2023, available [here](#).

⁵⁶⁶ Kathimerini, *Furious Michaelidou on minors in Pournara - They sleep on the floor, a piece of bread for breakfast*, 9 March 2022, available at: <https://bit.ly/3TsmytE>.

⁵⁶⁷ Knews, *Anastasiades visits Pournara after reports of unsuitable conditions*, 14 March 2022, available at: <https://tinyurl.com/yc4jzbsw>.

overcrowding at Pournara will be alleviated once transfers to a recently constructed reception centre south of Nicosia begins, Indicating Limnes Centre.⁵⁶⁸

During 2023, there were on average 150 UASC in Pournara and their stay was on average 80 days. The reason given by the authorities for such lengthy stays has often been that the age assessments were taking a long time to conclude; in the meanwhile, the children were required to stay in the centre with few support mechanisms, no education and few activities, which led to deepening frustration and various escape attempts.⁵⁶⁹ The CPT, in its aforementioned 2024 report, recommended that the Cypriot authorities urgently take measures to reduce the delays in the age assessment procedure and recalled its position that every effort should be made to avoid depriving children of their liberty.⁵⁷⁰

In 2024, the total number of UASC throughout the year was 628 children.⁵⁷¹ No improvements were observed with regards to the length of stay, which was approximately 100-120 days. Furthermore, toward the end of 2024, the SWS has refrained from facilitating the exit of UASC from Pournara to UASC shelters. As a result, the only UASC exiting Pournara are those who can secure accommodation with extended family members or adult friends. This has resulted in UASC without any network, becoming the residents with the longest stay in Pournara, some remaining in the Center from September 2024. In early 2025, the Commissioner for Human Rights published a Report stating that the duration of stay in closed centers is not consistent with the international legal framework concerning the protection and safeguarding of the rights of the child, and deprives these minors of fundamental rights.⁵⁷²

In 2023, there were no developments with regards to access to education or activities. The CPT reported there was little to no regular regime of structured or purposeful activities provided for any of the detained persons, including the children. While there was a covered playground in the centre of the main camp, only children in the main camp could access it, thus excluding children held in the safe zones; no other form of entertainment or schooling was available. There was no library, activities centre, sports yard, or place for religious worship, and all detained persons complained about having nothing to do to structure their days while they were waiting for news about their immigration status or medical entry test results. It was particularly deplorable that the children detained in Pournara Centre were not provided with any games, recreational activities, or educational classes, and many did not even have access to the small equipped outdoor area with swings.⁵⁷³

In 2023, the UN Human Rights Committee raised concerns that asylum-seekers, including children, often remain at Pournara for several weeks or months. Furthermore, the Committee raised concerns regarding the substandard conditions at reception facilities.⁵⁷⁴

In 2024 there were limited developments with regards to access to education or activities, with the establishment of a football field and a new playground.

⁵⁶⁸ Associated Press, *Cyprus president vows "more humane" migrant camp conditions*, 14 March 2022, available at: <https://tinyurl.com/4ur5y8cv>.

⁵⁶⁹ CPT, *Report to the Government of Cyprus on the visit to Cyprus carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 9 to 17 May 2023*, available [here](#).

⁵⁷⁰ Ibid.

⁵⁷¹ Information provided by Cyprus Asylum service.

⁵⁷² Commissioner for Administration and Protection of Human Rights (Ombudsman), *Report on the visit on February 21, 2025 to the "Pournara" Temporary Reception and Hospitality Center for migrants Immigrants in Kokkinotrimithia*, ΕΜΠ. 8 January 2025, available [here](#).

Kathimerini, *In Pournara, 27 unaccompanied minors for over 90 days*, 25 February 2025, available in Greek [here](#).

⁵⁷³ CPT, *Report to the Government of Cyprus on the visit to Cyprus carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 9 to 17 May 2023*, available [here](#).

⁵⁷⁴ UN, CCPR Human Rights Committee, *Concluding observations on the fifth periodic report of Cyprus*, September 2023, available [here](#)

For all residents, freedom of movement is restricted while staying in Pournara (see section: [Freedom of Movement](#)). Although the duration of stay was reduced in 2023, in comparison to previous years to an average of 30-40 days for adults and 80 days for UASC, it is still much longer than the initially planned 72 hours. In 2024, even with the decreased numbers of arrivals the duration of stay was similar to 2023, however there was a significant number of cases where the duration of stay for adults and families reached 3 months and for UASC 4 months.⁵⁷⁵ There is no legal basis for the restriction of movement during this time leading to a situation of de facto detention (see section: [Detention](#)).

The Centre has private security and, if necessary, contacts police to secure the perimeter and keep foreign nationals registered within the Centre and other persons outside. High barbed wire fencing surrounds the perimeter of the centre. The CPT, in its aforementioned May 2024 report, stated that it considers that persons held in the centre were *de facto* deprived of their liberty until they were permitted to leave, which was only once the various medical and other compulsory assessment results were received back from the specialist agencies and bodies. The CPT considered that placement in Pournara may amount to arbitrary deprivation of liberty, undermining access to basic safeguards against ill-treatment, and could last for an undefined period from several weeks to several months and even longer than a year in some cases, leaving detained persons in a state of uncertainty. Indeed, the situation was worse for minors undergoing age assessments, who on average stayed for more extended periods than the average adult.⁵⁷⁶

Asylum applicants may exit the Centre once all procedures have been concluded; however the authorities require them to present a valid address in the community. This requirement causes important difficulties and often prevents exit for the most vulnerable persons including persons with disabilities and large families who have increased difficulties identifying private accommodation. Furthermore, it has led to exploitation by agents, landlords and other persons in the community, increased risk of homelessness, as persons often discover upon exiting that the accommodation is not available, and appalling living.

Another reason for delays in exiting the Centre are often delays in the completion of the medical examinations. In 2024, such delays were often due to challenges in staffing the medical unit. Furthermore, if a Mantoux test is positive, the person is referred to a specialised medical center for assessment and treatment, however such referrals only take place once a month, which is not always communicated clearly to the person, leading to frustration or instances of positive tuberculosis cases.

The confinement in Pournara often leads to unrest. In 2021, the situation led to frequent protests in the Centre by asylum applicants, most times peaceful, but at times clashes between residents broke out or damage was caused. In late 2021, MPs from the Human Rights Committee of the Parliament carried out a visit to Pournara and stated having been left appalled by its conditions.⁵⁷⁷

In early 2022, another serious clash broke out among residents, leading to serious injuries and damages. Residents from neighbouring villages repeatedly voiced their discontent over the impact the Centre has on the area, specifically with regards to littering, trespassing and security concerns, and staged a protest

⁵⁷⁵ Commissioner for Administration and Protection of Human Rights (Ombudsman), *Report on the visit on February 21, 2025 to the "Pournara" Temporary Reception and Hospitality Center for migrants Immigrants in Kokkinotrimithia*, ΕΜΠ. 8 January 2025, available [here](#).

Kathimerini, *In Pournara, 27 unaccompanied minors for over 90 days*, 25 February 2025, available in Greek [here](#).

⁵⁷⁶ CPT, *Report to the Government of Cyprus on the visit to Cyprus carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 9 to 17 May 2023*, available [here](#).

⁵⁷⁷ Phileleftheros, *MPs in Pournara: "12 children stacked in containers"*, 13 December 2021, available in Greek [here](#); Phileleftheros, *These are not images that honor us in "Pournara"*, 15 December 2021, available [here](#); Cyprus Mail, *Pournara Camp a Ticking Bomb*, 19 December 2021, available at: <https://bit.ly/3LgqOa8>.

outside Parliament in July 2022. Community leaders have welcomed government plans of reinforced fencing around the Centre, but also demand the complete closure or relocation of the Centre.⁵⁷⁸

In 2023, during a football match between residents, a fight broke out between persons of different ethnicity, leading to injuries of some participants and arrests by the police that intervened. At the time, the Minister of Interior stated that all those involved to be arrested and deported.⁵⁷⁹ Persons were indeed arrested and detained, and their asylum applications examined speedily, however there were no reports of persons removed from the country without their asylum applications examined.⁵⁸⁰

In 2024, there were no incidents of unrest, and conflicts were rare and were handled swiftly without any injuries or serious damages. However, residents often raise complaints about the restriction of movement, which cause frustration and also highlighted the difficulties to identify and secure accommodation while held in the Center.

Regarding access to the Centre, an exterior fence was installed in 2023, increasing the controlled area of the facility. Furthermore, monitoring of access of staff and visitors in the Centre became much stricter. There are visiting hours (Mon-Fri: 12:00-16:00 and weekends 09:00- 16:00).

As for NGOs accessing the Center, there is limited access and only upon approval by the Asylum Service. In most requests by NGOs, and especially for legal advice, access is usually not granted.⁵⁸¹ See [Access to UNHCR and NGOs](#).

2.2. Reception Centre for Asylum Applicants, Kofinou

The main reception centre is located in the area of **Kofinou** in **Larnaca** District and began operating in 2014 with a nominal capacity of approximately 400 people. The Reception Centre is located in a remote area (roughly 25km from the nearest city, **Larnaca**), surrounded by dry fields and sparse vegetation. It is near a village with a population of approximately 1,300 people. There are bus routes connecting the reception centre with cities either directly in the case of Larnaca or through regional bus stations from where connecting transport can be used to reach other destinations. An extension of the Centre was announced in August 2022 and since October 2022 works have been underway. For this reason, in 2024 the Centre has been operating at a lower capacity at 300 beds. The redevelopment will increase the capacity of the Centre to approximately 600 people and was expected to be completed within 2024, however delays occurred and it is expected to be completed in early 2025.

The Centre hosts families, single women and single men, and all residents have direct access to all sections. The Centre does not provide facilities for vulnerable persons, and vulnerable persons will only be admitted by way of exception.

The Asylum Service is responsible for the overall operation and financial management of the **Kofinou** reception centre. The Director is appointed by the Ministry of Interior and is stationed onsite. The daily administration of the centre has been assigned to an NGO while some services such as catering and security are provided by contractors. Two policemen stationed as part of Limnes staff are also present in the area.

Kofinou Reception Centre consists of containers (mobile/temporary structures), with rooms designated to accommodate two to four persons depending on their size. There have been reports of more than four members of a family having to reside in one room, but not on a regular basis. Families do not share their

⁵⁷⁸ Cyprus Mail, *Kokkinotrimithia leader calls for closure of Pournara*, 24 February 2023, available at: <http://bit.ly/3JO2dKR>.

⁵⁷⁹ Cyprus Mail, *Migrants fighting at Pournara to be arrested and deported, minister says*, 6 November 2023, available at: <https://tinyurl.com/527b9rny>.

⁵⁸⁰ Information based on cases represented by Cyprus Refugee Council.

⁵⁸¹ Information provided by the Cyprus Refugee Council.

rooms, while single persons do. Single men and single women use separate toilets/bathrooms. Families are placed in containers with two rooms (one for each family) where a common *en-suite* bathroom/toilet is shared. In the case of a family with many members, both rooms (i.e., the whole container) can be allocated.

Residents of the reception receive a monthly stipend of € 100 for the head of the family and to € 50 for every other family member.

Three meals are provided per day and special dietary arrangements are typically accommodated. Complaints regarding quality, quantity and variety of the food were still observed. Residents may prepare their own food, in common kitchen areas, but must buy their own supplies.⁵⁸² Currently, six common kitchen areas and equipment are available to the residents.

According to residents, the cleaning of shared toilets/bathrooms is adequate. Families must clean their own toilets. Complaints of not having enough hot water throughout the day are rare. Reports of insects and snakes appearing on the premises, due to the location of the Centre, continue.⁵⁸³

Regarding access to the Centre for NGOs, there is access upon approval, and access is granted in most cases. A room is available for hosting residents and volunteers in order to carry out activities. During 2024, in addition to the library, four new containers were set up for hosting volunteers and NGOs. This new section is called the Integration Activities Area, and it currently houses activities such as computer classes, language lessons, occupational therapy, employability counselling, and others.

Residents are allowed to go out when they wish, providing that they do not leave the centre for prolonged periods of time. Residents are not allowed to leave the premises for more than 48 hours but, in some instances, this can be extended by notifying the Center's administrators.

Children in the Centre attend primary and high school in the community and a designated bus service is provided. No racist or discriminatory incidents were recorded and the integration of children in schools is reported, overall, as satisfactory by residents. There has been a positive collaboration between the schools and the Centre. Near-by schools have been able to accommodate the number of children residing in the centre and children's enrolment in education is typically performed timely. During 2024, and in order to accommodate commuting of students to schools in the nearest city of Larnaca, the Ministry of Education arranged for buses that connect directly the Center with those schools.

In 2024, staff in the Centre included: an NGO providing administrative services/social support in the Centre with 4 social workers and 2 administrators; 1 social worker from SWS that visits the centre twice a week; support from EUAA providing information to residents is currently suspended, 5 EUAA interpreters (Arabic, Somali, French, Farsi, Kurmanji, Badini, Turkish, Lingala); 10 interpreters provided and 5 case workers provided by the Asylum Service are also present. Additional staff includes two UNHCR staff members, one providing integration support services to residents and one monitoring conditions and providing legal advice. Other staff members include 3 cleaners, 4 carers, 3 maintenance technicians, and 24/7 security officers.⁵⁸⁴

A development, following demands of the residents and as foreseen in the Refugee Law, was the establishment of the "Committee of Resident's Representatives".⁵⁸⁵ The Committee carried out weekly meetings with the Director of the Centre, and a Code was signed between the residents and the Centre defining roles and recording procedures. The committee, though not officially, was inactive due to some of its active members having exited the Centre, but procedures to resume operation were initiated during 2024, however, they did not materialise.

⁵⁸² Information provided by the Cyprus Refugee Council.

⁵⁸³ According to reports to CyRC.

⁵⁸⁴ Information provided by the Cyprus Refugee Council.

⁵⁸⁵ Article 9IZ(2) Refugee Law.

In relation to Health Services provided, there is currently one nurse at the Centre each day and one mental health nurse visiting the Centre twice a week, and one pathologist offering services three times a week. In 2024, a new medical unit started operations as part of the general redevelopment of the Center. The new medical unit serves both Kofinou and Limnes residents.

Throughout 2024, a number of organisations have had regular access to the Centre, providing medical supplies, psychosocial support, Greek language classes, English language classes, upskilling workshops, dance classes, occupational therapy sessions to minors and adults, and activities specifically aimed at children including arts and sports classes.

Other facilities include two outdoor playgrounds, one outdoor gym, and a library. Works to build football fields inside the Centre were in progress at the time of reporting. There is Wi-Fi coverage in the centre, however at times, complaints are made regarding broadband speed/coverage. The library and the activities room are generally kept locked and are opened only when there is an activity taking place.

For the prevention of SGBV incidents *residents are* informed upon arrival by their social workers of the procedure to report any SGBV incidents, which is to directly report it to their social workers, who will then raise the matter with the Social Welfare Service. The SWS will then take appropriate actions depending on the severity of the incident.

Regarding the duration of stay in the reception centre, there is no specific time frame for asylum applicants. As long as the claimant of material reception conditions retains the status of an asylum applicant, they are eligible to reside in the centre. Upon the issuance of a final negative decision, the person is usually notified to make necessary arrangements to depart from Cyprus. Residents of Kofinou who have been rejected typically move to the Limnes section of the Centre and are allowed to remain until they depart from Cyprus. In 2023, efforts were made to remove persons that had received a final rejection, in some instances the police removed persons to detention. There were also limited number of evictions of persons due to violent behaviour.⁵⁸⁶ For the latter, arrangements were made by Kofinou Centre in order for temporary shelter in hotels to be provided upon exiting the Centre.

Residents who are able to provide a residence address in the community, are allowed to leave the centre and move if they want and are allowed to claim MRC at the Social Welfare Services. Although a number of residents, mainly those from Syria who had sufficient social networks in the community, were able to move, the vast majority of residents are reluctant to do this due to the unsatisfactory levels of support that are provided, the high rent prices of private accommodation, and the unavailability of social networks. Once a resident of the Centre receives a positive decision on their asylum application granting them international protection, they are given two months' notice in order to move out of Kofinou and into private accommodation in the community which they must find themselves. There is no procedure in place to accommodate the transition of persons into the community and there are no centres or shelters available for Beneficiaries of International Protection (see section: [Housing](#)). Furthermore, the high rent prices, obstacles in finding employment and delays in receiving State financial assistance means the transition of persons with International Protection from the Centre in the community remains a challenging process.

2.3. Residing in the Community

The total number of asylum applicants in 2023 reached over 25,000 and in 2024 over 20,000. With the capacity of Reception Centres limited to around 1,400 persons, most asylum applicants reside in the community in private houses/flats, which they are required to secure on their own.

As the main Reception Centre, Kofinou is at maximum capacity at almost all times, the SWS bears the responsibility of processing applications and addressing asylum applicants' needs, including the

⁵⁸⁶ Information provided by Cyprus Refugee Council.

allocation of an allowance to cover housing expenses. Asylum applicants are expected to find accommodation and provide all necessary documentation as part of this process.

The SWS only assists selected vulnerable persons with finding shelter in the community. For the vast majority of asylum applicants, housing continues to be a major issue, and they often find themselves in destitution, facing increased risk of homelessness, appalling living conditions and exploitation by agents, landlords and other persons in the community.

Practical difficulties in obtaining certain requirements such as a rental agreement, a deposit, and/or advance payments, which although foreseen in the 2022 Ministerial orders, they are still not allocated uniformly by Social Services, continue to generate issues in relation to securing shelter for applicants. Reports of landlords being unwilling to provide housing to asylum applicants are also alarming. The rapid rise in demand for housing in urban areas has led to a sharp increase in rent prices, making the gap between the allocated resources and rent prices even greater.

In addition, and as stated in the application form for reception conditions, (see section: Access and forms of reception condition) a maximum amount is allocated to each house occupied by asylum seeking tenants regardless of the number of tenants, the relationship between them, and the number of individual contracts they may have with the owner in the case of shared accommodation. The particular provision on a maximum amount was sporadically implemented in the past, but since 2020 until today, it is uniformly applied in all cases, increasing the risk of destitution and homelessness.

Contextually to the announcement of measures addressing migrant flows in early 2020, the Ministry of Interior declared: 'In co-operation with the Local Authorities, an investigation is launched into the illegal residence of immigrants in inappropriate premises with the simultaneous prosecution of owners who exploit them by receiving state housing allowances that applicants receive'.⁵⁸⁷ In practice, local authorities were requested to investigate such residences and some visits were carried out, however such premises continue to be in use.

The difficulties in securing shelter in the community have led to an increase in the use of run-down or derelict buildings. These are apartment buildings or former hotel apartments in very bad conditions, often without running water, with severe structural, electrical and sewage issues etc⁵⁸⁸. Due to their decaying conditions, the owners are generally unable to rent them to nationals and instead rent them to asylum applicants. Reports of owners receiving rent allowance for such properties from the SWS were reported in 2021 and 2022. Asylum applicants residing in such buildings include vulnerable persons such as single mothers with young children, pregnant women, violence/torture victims, disabled persons etc. The local authorities in some cases have taken legal action against the owners but due to lack of housing alternatives moving persons from such buildings has proven extremely difficult.

In 2024, the situation remained the same with no measures taken to prevent homelessness and destitution.

2.4. Accommodation for UASC

From 2020 onwards, unaccompanied children are referred to the **Pournara** First Reception Centre upon arrival for registration (see [Pournara](#)). Children under the age of 12 will most probably be immediately placed in the youth homes operated by the SWS for all children under their guardianship (nationals, EU nationals, third country nationals (TCNs)) and some of them are subsequently placed in foster families following relevant procedures. However, such ages of UASC are very rare in Cyprus.⁵⁸⁹

⁵⁸⁷ Dialogos, *Λήψη μέτρων για την ολιστική αντιμετώπιση των μεταναστευτικών ροών*, 12 March 2020, available in Greek at: <https://bit.ly/44jyYZ>.

⁵⁸⁸ Cyprus Times, 'Apartments where immigrants lived in Paphos are being sealed off. Miserable conditions without electricity and water (pics)', 16 October 2023, available [here](#)

⁵⁸⁹ Information provided by Cyprus Refugee Council.

Children under the age of 14 can be placed in foster care, usually with a family member of the extended family. The NGO “Hope for Children” CRC Policy Centre (HfC) runs the foster care programme that is addressed to all children regardless of nationality and status, including unaccompanied children under the age of 16. For foster children, guardianship remains with the SWS, and HfC and the SWS undertake the monitoring and support of the family. The child lives with the relative who is considered the foster parent and is expected to provide day to day care to the UASC. The housing conditions vary depending on the living arrangement of the foster parent, though there is an assessment of the living conditions of the foster parent and approval is conditional to criteria set by the SWS.⁵⁹⁰

Regarding reception facilities for UASC, there are four shelters hosting refugee children aged between 13 and 18; two in **Nicosia**, one in **Larnaca** and one in **Limassol**. The operation of all shelters is monitored by the SWS, one is managed by SWS and three of them are managed directly by the NGO “Hope for Children” CRC Policy Centre (HfC) following the relevant agreement between the State and the organisation. HfC has been running the Nicosia male Youth Home since 2014 and in 2019 took over the management of two more shelters in Larnaca.

Conditions in shelters vary, with those being directly under the management of SWS facing more challenges, especially with staff capacity, infrastructure conditions, social and psychological support, and integration activities. Educational arrangements both within mainstream education and non-typical education contexts are in place across all shelters, however a considerable number of children do not regularly attend school. Non-typical educational activities include language courses, music classes, art and drama therapy, physical education, sewing and other.⁵⁹¹

In 2022, due to the increase in numbers of UASC and limited capacity in existing shelters and other accommodation options and the substandard conditions in Pournara, the Social Welfare Services contracted hotels as a temporary measure to house UASC. The conditions in the hotels are not considered up to standard.⁵⁹² In 2023 and early 2024, 3 hotels continued to be used in Larnaca, Paphos and Ammochostos district. In 2024, only the hotel in Paphos remained in operation and by early 2025 it also ceased operations.⁵⁹³

In addition to the shelters, there are five programmes offering semi-independent living for unaccompanied children ages 16-18, aiming at facilitating the transition into adulthood. One is run by the SWS itself, a second by IOM, a third by NGO “Hope for Children” CRC Policy Centre, the fourth offered by St Joseph’s Social Center and the fifth offered by CODECA. Regardless of the programme to which the child is allocated, guardianship remains with the SWS. Under the programme run by the SWS, an adult, usually familiar to the child, is appointed as a focal point for the child and undertakes their day-to-day care. In the programmes run by IOM, HfC and CODECA the day-to-day care is overseen by the organisation’s staff.

IOM launched its programme in April 2020 and offers legal advice, psychological support, social counselling, access to education and vocational training, and rehabilitation services.⁵⁹⁴ Referrals to the programme are made by the SWS while the UASC are in **Pournara** First Reception Centre. The programme is comprised of studio apartments located in various areas. Girls and boys are hosted separately. Social workers are assigned by IOM to assess and address the needs of the UASC.

⁵⁹⁰ Information provided by Hope for Children.

⁵⁹¹ Information provided by Cyprus Refugee Council.

⁵⁹² Commissioner for Child’s Rights, *Memorandum of the Commissioner for the Protection of the Rights of the Child for the discussion on “The government’s actions to find a suitable space for the creation of adolescent immigrant protection structures, as an obligation of the state stemming from the Recovery and Resilience Plan” at the Parliamentary Committee on Interior*, on 23 November 2023, available [here](#).

⁵⁹³ Information provided by SWS.

⁵⁹⁴ IOM press release, *IOM Supports the Transition to Adulthood of Unaccompanied Migrant Children in Cyprus*, 14 April 2020, available in English at <https://bit.ly/3r3tOw4>.

Additionally, there are support staff, whose duty station is close to the housing unit and assist with day to day needs of the UASC. Psychological support is offered by HfC staff, whereas IOM offers legal advice and social counselling.

The HfC semi-independent programme has been running since 2017. Though initially only implemented in Nicosia, it has since expanded to Larnaca. The programme consists of apartments in the urban areas of Nicosia and Larnaca. Capacity is limited with approximately 30 children. Children referred to this programme are former residents of the UASC shelters run by HfC in Nicosia and Larnaca, assessed by the staff as able to live under a more independent framework or, more often, UASC who are approaching the age of majority and should be eased into the life of a young adult. The UASC receive legal advice, psychological support, social counselling, access to education and vocational training, and rehabilitation services by HfC staff.⁵⁹⁵

Various issues were reported regarding unaccompanied children transitioning to adulthood. In December 2018, the Commissioner for the Rights of the Child published a report expressing concern over the lack of measures to support unaccompanied migrant children who turn 18 to access suitable accommodation, education, training, employment, information and social, psychological and mental health support.⁵⁹⁶ The majority of issues reported remain unresolved throughout 2024.

When children reach the age of maturity at 18 years old, they are requested to leave the shelters. In rare cases, the stay can be prolonged due to humanitarian or other extraordinary reasons (such as serious health concerns, if leaving the shelter will interfere with education, and other serious vulnerability). The shelter staff undertake the preparation of children for the transition into adulthood in terms of securing accommodation, finding employment, or applying for material reception conditions. In many cases where accommodation had not been secured, the SWS financed the stay of the young adults in temporary hotels or hostels. HfC has an internal policy to follow up on the young adults for a period of 6 months in order to ensure smooth transition and wellbeing of the former UASC.⁵⁹⁷

In 2024, the following shelters and programmes were used to accommodate UASC:

Capacity and Occupancy at different types of accommodation programmes of UAMs as of 31 December 2024		
Program	Capacity (Fixed Places)	Occupancy
4 Residential care	78	74
47 units of Semi-Independent Living	382	306
Semi-Independent Living (relatives)		326
One Hotel	35	30
Foster Care		156
Other		10
SUBTOTAL	495	902
Pournara Centre		48
TOTAL		950

Source: Social Welfare Services

⁵⁹⁵ Information provided by Hope for Children.

⁵⁹⁶ Commissioner for the Rights of the Child, *Report on the procedures for the transition to adulthood of UASC / Έκθεση της Επιτρόπου, αναφορικά με τις διαδικασίες μετάβασης στην ενηλικίωση των ασυνόδευτων ανηλίκων αιτητών ασύλου*, 19 December 2018, available in Greek at: <https://bit.ly/2UthBEa>.

⁵⁹⁷ Information provided by Hope for Children and Cyprus Refugee Council.

2.5. Limnes Reception/Pre-removal Centre

The Centre at Limnes began to operate in November 2021 with small groups of refused asylum applicants being transferred there from Pournara. Given its recent establishment, as well as the lack of access to the Centre there are no reports on the conditions in the Centre. However, the general conditions were considered substandard and in August 2022, it was announced that Cyprus was to receive € 72m in funds from the European Commission, for projects to support the reception, asylum and return systems in Cyprus, which included € 67m for the enhancement of the capacity at Limnes.⁵⁹⁸

The Centre ceased operations in July 2023 and people were moved to a section in Kofinou Reception Centre while construction takes place in Limnes. The construction is estimated to be concluded in 2025 and operations are expected to start in 2026.⁵⁹⁹

While the centre was operating in the original location in 2022 and early 2023, the majority of persons transferred to Limnes, mainly from Pakistan and Bangladesh, had been issued with negative asylum decisions and a decision determining their place of residence as Limnes, with a provision that should they decide to leave Limnes they would have no access to welfare assistance. The trend was for persons to voluntarily leave the Centre and reside in the community, without access to material reception conditions, mainly to access employment opportunities in the community.

Those who elected to reside at the Centre were accommodated in the open sections of the Centre and were allowed to move enter and exit between 9am and 9pm, however exceptions are made in relation to persons who might need to exit the Centre at different times, either for medical or employment reasons. Furthermore, they were provided with a stipulated cash allowance of € 100, allocated at the end of each month.

The Centre was also used at times on ad-hoc basis to address overcrowding at Pournara.

In early 2023, there were approximately 150 persons at Limnes, all in the open section of the Centre of which the majority had received a first instance rejection to their asylum application.

From mid-2023 until present, the Centre is operating in a section of Kofinou Reception Centre. The area allocated for Limnes has the capacity to host approximately 300 residents. Persons who are admitted to Limnes include:

- ❖ Persons who receive a first-instance rejection through the accelerated procedure whilst at Pournara. They are given the choice to either remain at Limnes during their appeal procedure or to leave Limnes, thereby waiving their right to welfare benefits;
- ❖ Persons who apply for the Assisted Voluntary Return Program, either from Pournara or from the community, provided that they do not have accommodation of their own; those who do can continue to reside at their accommodation until the return flight. These persons are expected to remain at Limnes until their return flight, at which point they are transferred directly to the airport;
- ❖ Persons who are included in the EU Relocation Scheme. This may also include Kofinou residents as once they are pre-selected for relocation they are transferred from Kofinou to Limnes. Persons in the Relocation Scheme remain at Limnes throughout the clearance procedures and until their relocation flight, at which point they are transferred directly to the airport; and

⁵⁹⁸ Ministry of Transport, Communications and Works, *Announcement: Tender Announcement for the Construction of a "LIMNES" Hospitality Center for International Protection Applicants and a Pre-Departure Center for persons who will be repatriated to the Menogia area of Larnaca District*, 26 January 2023, available in Greek at: <http://bit.ly/3TZaArO>; Cyprus Mail, *EU and Cyprus close to an agreement for support on migration*, 16 June 2022, available at: <http://bit.ly/3JVBE6D>.

⁵⁹⁹ Information provided by Cyprus Refugee Council.

- ❖ A small number of exceptional cases, such as persons who are released from Pournara but who are unable to secure accommodation.
- ❖ Asylum applicants.

In early 2024, the majority of residents in Limnes were persons that had applied for the Assisted Voluntary Return Program. However, since March 2024, the Center has been hosting some 160 asylum seekers mainly Syrians.⁶⁰⁰

Regarding conditions in Limnes (as a section of Kofinou) these are considered to be generally up to standard. The section is separated into 3 zones. Men are always housed in a different zone separately from women. Each family, including single parent families, are provided with a separate container with one bathroom per two adjoining rooms. The zone that houses single men, does not have individual bathrooms; instead, there are shared bathrooms.

Regarding freedom of movement the same rules apply as with Kofinou Center and residents are allowed to go out when they wish, providing that they do not leave the centre for prolonged periods of time. Residents are not allowed to leave the premises for more than 48 hours. However, exceptions are made in relation to persons who might need to exit the Centre at different times, either for medical or employment reasons. Persons who are transferred to Limnes and are asylum applicants are provided with a stipulated cash allowance of € 100, which is allocated at the end of each month whereas, persons who are not asylum applicants such as those who have a final rejection or have withdrawn their asylum application as part of voluntary return program are not entitled to this allowance.⁶⁰¹

C. Employment and education

1. Access to the labour market

Indicators: Access to the Labour Market

1. Does the law allow for access to the labour market for asylum applicants? ☒ Yes ☐ No
 ❖ If yes, when do asylum applicants have access the labour market? After 9 months
2. Does the law allow access to employment only following a labour market test? ☒ Yes ☐ No
3. Does the law only allow asylum applicants to work in specific sectors? ☒ Yes ☐ No
 ❖ If yes, specify which sectors: Specific professions in agriculture-animal husbandry-fishery-animal shelters and pet hotels, processing, waste management, trade-repairs, provision of services, food industry, restaurants and recreation centres as well as laundromat services and dissemination of advertising material
4. Does the law limit asylum applicants' employment to a maximum working time? ☐ Yes ☒ No
 ❖ If yes, specify the number of days per year
5. Are there restrictions to accessing employment in practice? ☒ Yes ☐ No

The Refugee Law affords the Minister of Labour, Welfare, and Social Insurance, in consultation with the Minister of Interior, the power to place restrictions and conditions on the right to employment without hindering asylum applicants' effective access to the labour market.⁶⁰²

⁶⁰⁰ Information provided by Cyprus Refugee Council.

⁶⁰¹ Ibid.

⁶⁰² Article 9Θ(2)(a)-(b) Refugee Law.

In 2023, after a period of 5 years (2018 -2023) during which access to the employment was permitted one month after lodging an asylum application,⁶⁰³ a new Ministerial Decree/Decision 312/2023 was issued according to which asylum applicants are permitted to access the labour market nine months after submitting their asylum application.⁶⁰⁴ The Decree/Decision took effect in October 2023. This the longest period of prohibiting access to asylum applicants set by a ministerial decision, since 2006. Employers' associations have expressed their concern over the possible effects of the 9-month ban on businesses' capacity to cover their staff needs.⁶⁰⁵ MLSWI announced the intention to address gaps by facilitating the utilization of other non-Eu citizens, including students and persons on a working visa. Towards this direction, a new framework for the employment of foreign workers foreseeing, among others, the increase of the number of non-EU citizens allowed to be employed in Cyprus, was announced.⁶⁰⁶

With regards to the permitted employment sectors, there are no substantial changes in the latest decree.

Currently, according to the Decree 312/2023,⁶⁰⁷ the permitted fields of employments for asylum applicants are the following:

Permitted sectors and posts for asylum applicants	
Sectors of labour market	Permitted occupations
Agriculture-Animal Husbandry-Fishery-Animal Shelters and Pet Hotels	<ul style="list-style-type: none"> ❖ Agriculture Labourers ❖ Animal Husbandry Labourers ❖ Poultry Farm Labourers ❖ Fishery Labourers ❖ Fish Farm Labourers ❖ Animal Caretakers
Processing	<ul style="list-style-type: none"> ❖ Animal Feed Production Labourers ❖ Bakery and Dairy Production Night-Shift Labourers ❖ Loading / Unloading Labourers ❖ Poultry Slaughterhouse Night-Shift Labourers
Waste Management	<ul style="list-style-type: none"> ❖ Sewerage, Waste and Wastewater Treatment Labourers ❖ Collection and Processing of Waste and Garbage Labourers ❖ Recycling Labourers ❖ Animal Waste and Slaughterhouse Waste Processing Labourers
Trade-Repairs	<ul style="list-style-type: none"> ❖ Petrol Station and Carwash Labourers ❖ Loading / Unloading Labourers ❖ Fish Market Labourers ❖ Assistant Automobile Panel-Beaters and Spray-Painters

⁶⁰³ Ministerial Decision 308/2018, pursuant to Article 9Θ(1)(b) of the Refugee Law; available in Greek at: <https://bit.ly/4aVTZMx>.

⁶⁰⁴ Ministerial Decision 312/2023, pursuant to art. 9Θ(1)(b) of the Refugee Law available in Greek, at: <https://tinyurl.com/ycycztjy>

⁶⁰⁵ Philenews, *Χάνονται εργατικά χέρια και ζητούνται διευκρινίσεις*, 12 March 2024, available in Greek [here](#).

⁶⁰⁶ Federation of Employers and Industrialists, *Πλαίσιο εργοδότησης αλλοδαπών εργαζομένων*, 19 February 2025, available in Greek at: <https://bit.ly/3D4mKvo>.

⁶⁰⁷ Ministerial Decision 312/2023, pursuant to art. 9Θ(1)(b) of the Refugee Law available in Greek, at: <https://tinyurl.com/ycycztjy>.

Service Provision	<ul style="list-style-type: none"> ❖ Employment by Cleaning Companies as Cleaners of Buildings and Outdoor Areas ❖ Advertising Material Delivery Persons ❖ Food Delivery Persons ❖ Groundskeepers ❖ Loading / Unloading Labourers ❖ Pest Control Labourers for Homes and Offices
Restaurants and Recreation Centres/Hotels	<ul style="list-style-type: none"> ❖ Kitchen Aides, Cleaners ❖ Food Delivery Persons
Other	<ul style="list-style-type: none"> ❖ Laundromat Labourers

The shortage of staff observed in financial sectors in Cyprus particularly in the tourism industry, but also in the food and beverage and construction sectors continues and has led employer's organisations⁶⁰⁸ to hiring non-EU citizens is facilitated by the authorities to overcome acute staff shortages.⁶⁰⁹

According to the Ministerial Decree, persons on work permits who were already employed in Farming/Agriculture sector before they applied for asylum are not allowed to leave their job. Should both parties (employer and employee) agree to terminate the employment, that person will only be allowed to work a job within the same sector/profession.

The Decree also foresees that in the case of asylum applicants working for cleaning companies that offer services in the Tourism businesses, the terms and conditions of the position should be regulated by the tourism sectoral collective agreement.

Similarly, if an asylum applicant works for a cleaning company that offers services in the Food and Beverages Industry (for example restaurants, bars etc), the terms and conditions of the job should be regulated by the Leisure Centres Legislation.

Asylum applicants who have secured work, contribute to the National Health System (GESY) by an amount proportional to their salary and deducted every month. Still, they are not allowed to access GESY services and receive lower standard health care through public hospitals.

According to the Refugee Law, asylum applicants are permitted to take part in vocational trainings linked to employment contracts relevant to the permitted sectors of employment for asylum applicants, unless otherwise authorised by the Minister of Labour, Welfare and Social Insurance. In practice, however, there are no professional training schemes available for those specific sectors.

Procedure with the Labour Department

All applicants including claimants or recipients of MRC who are physically and psychologically able to take up employment are able to register as unemployed on the Labour Department's online system after the initial nine-month period and look for jobs. In order to maintain their unemployment status, they need to renew their registration in the Labour Department within specific timeframes and actively seek employment.

The Labour Department provides job referrals to asylum applicants. Applicants are required to contact the employers directly, and the employer is expected to provide a written report on the outcome of the meeting. The form does not provide space for the asylum applicants' statements on the outcome of the

⁶⁰⁸ Economy Today, *Article by Mr. Michalis Antoniou, Director General of Cyprus Employers and Industrialists Federation*, February 2024, available in Greek at: <https://tinyurl.com/h9fadcfw>.

⁶⁰⁹ Economy Today, *Interview of Mr. Filokypros Roussounides, Director General of Cyprus Hotel Association*, February 2024, available in Greek at: <https://tinyurl.com/mr3aevsz>.

meeting, including, for instance, the reasons why it was not possible for the asylum applicant to be offered a job. Asylum applicants cannot challenge the statements of the employer. This may lead to asylum applicants being considered as wilfully unemployed by the Labour Department and the SWS, resulting in loss of MRC and there is no effective procedure to challenge those results.⁶¹⁰

All employers recruiting asylum applicants are required to be authorised by the Labour Department. To do so, an application must be filed at the Labour Department containing details of the prospect employee. The application must be accompanied with a confirmation that the employer has all responsibilities towards the Social Insurance Department settled. By submitting the application to hire an asylum applicant, the employer agrees to provide active liability insurance and to inform the employee in writing about the employment terms which must be at the same level with those of other staff performing similar duties

Under the previous Decree, issued in 2021⁶¹¹ and applicable up to late 2023, the application of the employer to hire an asylum applicant should be accompanied, among other documents, by an employment contract signed by both the employee and the employer. Although the process of reviewing the contract was particularly lengthy, asylum applicants were allowed to start working before a final, formal decision on the employer's application was reached which had facilitated access of asylum applicants to jobs and allowed for higher numbers of asylum applicants to enter the labour market.

Under the latest Decree, the submission of the contract is no longer required. This has allowed for a faster conclusion of the examination of the employer's application, since there is no contract to be reviewed and approved by the competent authorities. At the same time, however, employees' access to important information regarding their rights, employment terms, the hiring process and the outcome of the employer's application, is not safeguarded or facilitated.

Since 2023 and until today, there are disruptions in the employment of asylum applicants who are rejected at first instance. This is due to the fact that the online system managed by the Ministry of Labour and Social Insurance in which employers are obliged to register their employees, indicates those asylum seekers as ineligible to work, regardless of whether the legal requirements of losing their residence status are met. Unemployed asylum seekers in such a situation are not permitted to be hired and asylum applicants in employment will often stop working, often only to be hired again when the system is properly updated, a process that may take weeks or months.⁶¹²

During 2024, these disruptions, along with the 9-month employment ban imposed by the latest Decree⁶¹³ and the speed up of processing decisions on asylum claims, led to a decline in the interest of employers to hire asylum applicants. This was the case despite the shortage of staff and the insufficient procedures to import staff from non-EU countries on a work permit.⁶¹⁴

Terms and conditions of employment

The increased numbers of asylum applicants entering legal employment during 2021-2023 had allowed for higher numbers of asylum applicants claiming social insurance benefits, such as unemployment benefit, maternity benefit and others. Observations indicate that Social Insurance benefits derived by an active employment status, such as maternity and sick leave are granted to asylum applicants, in contrast

⁶¹⁰ Information provided by Caritas Cyprus and Cyprus Refugee Council.

⁶¹¹ Ministerial Decree 413/2021, pursuant to Article 9Θ(2)(α) και (β) of the Refugee Law, available in Greek at: <https://tinyurl.com/muutd832>.

⁶¹² Information provided by Cyprus Refugee Council.

⁶¹³ Ministerial Decision 312/2023, pursuant to art. 9Θ(1)(b) of the Refugee Law available in Greek, at: <https://tinyurl.com/ycycztjy>.

⁶¹⁴ Economy Today, *Article by mr. Michalis Antoniou, Director General of Cyprus Employers and Industrialists Federation*, February 2024, available in Greek at: <https://tinyurl.com/h9fadcwf>.

with unemployment benefit which is not granted to asylum applicants, regardless of whether they fulfil the typical requirements.⁶¹⁵

According to the 2021 MLWSI annual report,⁶¹⁶ 33 (1.55%) out of a total of 2,133 complaints submitted to the Labour Relations Department, were made by asylum applicants and non-EU students. The 2022 MLWSI annual report⁶¹⁷ indicates a decrease in the complaints filed by Cypriot and EU citizens and an increase of the complaints filed by asylum applicants and non-EU students (99 complaints, 5.2%). CyRC assists asylum applicants in filing such complaints.

A Ministerial Decree⁶¹⁸ issued in August 2022 established a National Minimum Wage in Cyprus with effect from January 2023. A new Decree, issued in December 2023⁶¹⁹ increased the minimum wage to 900 EUR for the first 6 months of employment, and to 1,000 EUR after six months of continuous employment. Although, domestic workers, workers in agriculture and farming, workers in shipping, and workers covered by the relevant Decree for the Hospitality Sector issued in 2020, are excluded from the Minimum Wage provisions, the majority of jobs which asylum applicants have access to are included. The provisions of the national minimum wage do not regulate the exact duration of the working day which can vary among different businesses/sectors.

Concerns raised by trade unions with regard to remuneration, the revisions of minimum wage and actual implementation, still continue.⁶²⁰ Furthermore, although collective agreements do exist for a number of professions in Cyprus through a voluntary tripartite system (employers, unions, state), they are not legislatively regulated and imposed.

Online registration

Since September 2021, registrations and renewals of registrations for unemployed persons in the Public Employment Services (PES) are performed online.⁶²¹ All beneficiaries of PES are required to create an individual online account and visit frequently the website to maintain their registration active. While online, the system is not automated. The registration process and the use of the system still require direct email exchange, and/or telephone communications with Labour Officers, who still need to perform various verification procedures. This situation results in particularly limited capacity to timely attend and resolve issues, as well as poor employment-related guidance.

Obstacles faced by asylum applicants in accessing the labour market:

- ❖ **Limited allowed sectors:** Asylum applicants are allowed to work in particular sectors of the economy, specified by a Ministerial Decree⁶²² in line with the provisions of the strategy for the employment of third-country nationals.⁶²³ The strategy grants priority to nationals and EU citizens in accessing employment and foresees the possibility to approve the employment of non-EU citizens in sectors where the labour check procedure indicates persistent lack of local/EU staff.

⁶¹⁵ Information provided by Caritas Cyprus and Cyprus Refugee Council.

⁶¹⁶ MLWSI, *Annual Report 2021*, March 2022, available in Greek at: <https://bit.ly/3IL0jKy>.

⁶¹⁷ MLWSI, *Annual Report 2022*, February 2023, available in Greek at: <https://tinyurl.com/yax6wjeh>

⁶¹⁸ Cyprus Official Bulletin, *Διάταγμα για τον Περί Κατωτάτου Ορίου Μισθών Νόμο*, 20 December 2023, available in Greek at: <https://tinyurl.com/337dca8r>.

⁶¹⁹ Cyprus Official Bulletin, *Διάταγμα για τον Περί Κατωτάτου Ορίου Μισθών Νόμο*, 20 December 2023, available in Greek at: <https://tinyurl.com/337dca8r>.

⁶²⁰ Reporter, *Κλείδωσε στα 940 ευρώ ο Εθνικός Κατώτατος Μισθός-Ποιοι εξαιρούνται*, 31 August 2022, available in Greek at: <https://bit.ly/41DOC00>; Philenews, *Τετραμήφιος ο κατώτατος μισθός και με διάταγμα*, 22 September 2023, available in Greek at: <https://tinyurl.com/3pa9erux>.

⁶²¹ Public Employment Service, online platform, available at: <https://tinyurl.com/4p4hj3e4>

⁶²² Ministerial Decree 228/2019 pursuant to Article 9Θ(2)(α) of the Refugee Law, available in Greek at: <https://bit.ly/2IQOEuZ>.

⁶²³ Στρατηγική για την απασχόληση αλλοδαπού εργατικού δυναμικού 2022, available in Greek at: <https://bit.ly/3J6fNJp>.

Apart from the currently allowed sectors for asylum applicants, the employers' organizations have been persistently pointing out high staff shortages in additional economy sectors, requiring permission to hire non-EU workers in order to cover their needs. However, the permitted working sectors for asylum applicants remain limited, significantly narrowing the available job options in sectors with lower wages and worst conditions.

- ❖ **Low wages and lack of adequate supplementary material assistance:** Remuneration from employment is typically highly insufficient to meet the needs of a household. This is particularly problematic for asylum applicants with families and is compounded by the sharp increase of rent in urban areas as well as a lack of effective supplementary measures for asylum applicants with low income. The salary of an asylum applicant is now taken into consideration by the Social Welfare Services in order to determine the level of material reception conditions. However, given the height of the minimum wage and the very low amounts provided as MRC, few families are able to receive both MRC and salary. For example, a family with 4 members where only one of them is working with the minimum wage, will not be entitled to any MRC.
- ❖ **Distance and lack of convenient transportation:** Although the expansion of the permitted sectors for asylum applicants provides employment opportunities in urban areas, many jobs remain in remote regions, and working hours may include night shifts, or start as early as 04:00 or 05:00 am. Asylum applicants have reported difficulties in commuting to these workplaces using low-cost transportation (e.g. public buses) as public transportation usually starts from around 06:00am and is poorly connected in rural areas.
- ❖ **Language barriers:** Lack of communication skills in Greek and English often impede efficient communication with officials of Labour Offices as well as potential employers. Many asylum applicants are unable to understand their prospective employers' opinion during meetings and/or the employers' opinions on their job referral forms.
- ❖ **Hesitation from employers to employ asylum applicants:** Businesses and employers have become more reluctant to employ asylum applicants following the 9-month employment ban imposed in October 2023. Additionally, the faster examination of asylum applications both at first instance and at Court, as well as the implementation of procedures that do not provide the right to remain and work has also contributed to employers' reluctance to employ asylum applicants. The lack of any possibility for asylum applicants to transit to employment-related right to stay, and the diachronic firm political unwillingness to facilitate such flexibility between statuses for persons in the country means that the employment of an asylum applicants will in many cases be for a short period of time.
- ❖ **Lack of gender and cultural sensitivity in the recruitment procedure:** Female asylum applicants often face difficulties accessing employment for reasons because of the jobs allowed, which are typically manual and require physical strength, as well as cultural barriers.⁶²⁴ Many women have never worked before which requires gradual and facilitated transition to employment. Women from Muslim backgrounds wearing visible symbols of their religious identity (for example the *hijab/niqab*) report having faced difficulties accessing the labour market as they were considered, in some cases, unable to maintain employment due to their attire. There have also been reports on behalf of African candidates regarding the unwillingness of employers to hire them in front-desk positions.
- ❖ **Lack of appropriate information with respect to the terms/conditions of employment, labour rights, complaint mechanisms:** It is often reported that asylum applicants are unaware of their legal rights, the exact terms and conditions of their prospective employment, and have no

⁶²⁴ See also; Ombudsman, *Report on access of female asylum applicants to employment and social welfare*, 1799/2016, 11 November 2016, available in Greek at: <https://tinyurl.com/mu5592vm>.

knowledge of available complaint mechanisms, or the role of trade unions. Resorting to the Labour Relations Court is also expensive since there is no legal aid for that purpose, as well as time-consuming.

- ❖ **Problematic access to the services of the Labour Department:** Existing system of the Labour Department requires efficient use of an online registration portal and direct communications prohibits asylum applicants from effectively using its job-seeking services.
- ❖ **Disruptions in employment due to the operation of “Ergani”, the online system managed by the Ministry of Labour and Social Insurance:** As soon as an employed asylum seeker is rejected at first instance, the system notifies the employer that the particular employee is ineligible to work, which typically leads to dismissal. This process takes place routinely and uniformly for all asylum applicants in this situation, regardless of whether the legal requirements for receiving a final answer and lose the residence status are met. The asylum seekers who file an appeal are allowed to be registered again in “Ergani”, provided that their employers still need them, only after the system is updated about the appeal submission, a process that may take weeks or even months to conclude.

When asylum applicants leave the Pournara Camp, they must declare an address. According to article 8 of the Refugee Law, in case they decide to change address, they need to inform the competent authority (asylum service and immigration departments). Although not specified in the Law, the Immigration department requires the submission of a stamped rental agreement by asylum applicants in order to register their new address. Taking into consideration that asylum applicants often live with friends and relatives without a rent agreement due to the very high cost of rent, it is very difficult to change their address through this procedure. This situation affects the registration process at the district labour offices as they require to change first their address at the immigration offices before they proceed with the labour office registration. Inevitably, this affects the access to SWS and labour services

Lastly, asylum applicants face issues to access driver's licence which affects their access to food delivery jobs. In September 2020, the Department of Transportation issued a Circular/Guidance note concerning the criteria and the procedures for obtaining or renewing a driving license in Cyprus.⁶²⁵ The Circular established additional requirements for non-Cypriot citizens (including asylum applicants), which hindered their possibilities of obtaining or renewing driving licenses and, as a result, accessing one of the few allowed and most popular job sectors among asylum applicants, i.e., food delivery. The requirements are considered to be in violation of the Driving License Law,⁶²⁶ that transposes the relevant article of the EU Directive on Driving Licences,⁶²⁷ which requires that an applicant be residing in Cyprus at least 6 months. Moreover, for asylum applicants, the new requirements demand a valid residence permit whereas asylum applicants only receive the Confirmation of Submission of an Asylum Application, which acts as a valid residence permit and is accepted by all State agencies, such as the Labour Department, public hospitals, and Welfare Social Services etc. This includes the date of submission therefore verifying the requirement for a 6 month stay in the country.

Following interventions by NGOs, UNHCR, and employers, the issue was brought for discussion before the Human Rights Committee of the Parliament in February 2021, in view of the discriminatory policy and violation of the Law and EU Directive. During the discussion, the Department of Transportation agreed to

⁶²⁵ Circular/Guidance Note αρ.32/2020, *Άδειες οδήγησης – Απαιτήσεις για άδεια παραμονής και τεκμήριο για έξι μήνες παραμονής*, 9 September 2020, available in Greek at: <https://bit.ly/3cPlonf>.

⁶²⁶ Article 5, Driving License Law, available in Greek at: <https://bit.ly/2PzdcQg>.

⁶²⁷ Article 12. EU Directive 2006/126 on Driving Licenses (Recast), “For the purpose of this Directive, ‘normal residence’ means the place where a person usually lives, that is for at least 185 days in each calendar year, because of personal and occupational ties, or, in the case of a person with no occupational ties, because of personal ties which show close links between that person and the place where he is living”.

review the criteria. In May 2021, a new circular was issued,⁶²⁸ but it did not provide any further clarifications on the main problematic point, i.e., the fact that for asylum applicants, their Confirmation of Submission of an Asylum Application acts as a valid residence permit. The issue was brought up by the main opposition party before the Parliamentary Committee for Labour, Welfare and Social Insurance. To date however, no decision on the matter has been reached.⁶²⁹ At the same time, a bill, reviewing driving test procedure, the categories and validity of driving licenses, safety in work and other relevant issues is under drafting.⁶³⁰

2. Access to education

Indicators: Access to Education

1. Does the law provide for access to education for asylum-seeking children? ☒ Yes ☐ No
2. Are children able to access education in practice? ☒ Yes ☐ No

The Refugee Law provides that all asylum-seeking children have access to primary and secondary education under the same conditions as Cypriot citizens, immediately after applying for asylum and no later than three months from the date of submission of the claim.⁶³¹ In practice, the vast majority of children access public education. However, as there is no systematic monitoring of children's registration at school, there have been cases of children remaining out of the education system for more than three months, mainly due to difficulties faced by families in accessing certain schools, lack of information/timely arrangements, and limited school capacities to accommodate additional students, etc. There is also a lack of official data on dropout rates regarding asylum-seeking children.

The Refugee Law allows for education arrangements to be provided in the reception centre.⁶³² However, children residing in **Kofinou** Reception Centre attend regular schools in the community. Children in the Centre attend primary and high school in the community. No racist or discrimination incidents were recorded and the integration of minors in schools is reported, overall, as satisfactory by residents.

Children in **Pournara**, accompanied or unaccompanied, do not attend school, regardless of the time they remain in the Centre (see [Conditions in reception facilities](#)). UASC

The right of enrolled students to attend secondary education is not affected even when they reach the age of 18.⁶³³ However, considering that the last three years of secondary education are non-obligatory, almost all new students above 18 years of age wishing to enrol for the first time in secondary education are denied access to free public schools by the Ministry of Education. Interventions by NGOs for specific cases have resulted in enrolment, but the overall situation remains. There are no programs targeting out-of-school young refugees.

The age of students and their previous academic level is taken into consideration when deciding the grade where they will be registered. Classes at public schools are taught in Greek. Should they wish to attend a private school (usually to attend courses in English), it is possible at their own cost. The provisions for children asylum applicants are the same as for every non-Greek speaking student.

⁶²⁸ Circular/Guidance Note αρ. 9/2021, *Άδειες οδήγησης – Απαιτήσεις για άδεια παραμονής και αποδεικτικού εξάμηνου διαμονή στη Δημοκρατία*, 12 May 2021, available in Greek at: <https://tinyurl.com/mu4dpnf8>.

⁶²⁹ Αρ. Θέματος 65. Το εργασιακό καθεστώς των διανομέων (delivery) στην εστίαση και στις ψηφιακές πλατφόρμες διανομής προϊόντων, available at: <https://bit.ly/36D0AzA>.

⁶³⁰ Ο περί Άδειας Οδήγησης (Τροποποιητικός) Νόμος του 2022. (Αρ. Φακ. 23.01.063.031-2022), available at <https://bit.ly/3mf4irb>.

⁶³¹ Article 9H(1) and (3)(a) Refugee Law.

⁶³² Article 9H(1) Refugee Law.

⁶³³ Article 9H(2) Refugee Law.

In order to deal with the language barrier in Gymnasium and Lyceums, the Ministry of Education has developed a combination of arrangements, i.e., transitional classes offering 14-20 hours of Greek per week as well as selected other subjects, and short classes, offering 5 hours of Greek per week.⁶³⁴

In 2022 the Minister of Education acknowledged that the induction of non-Greek speaking children in the schools needs to be improved. It announced a series of additional measures which aim to increase the interaction of schools with families of children whose mother language is not Greek, while introducing a more intensive evaluation process of Greek language use and a closer monitoring of the learning process, progress, and learning outcomes. The operation of obligatory classes during the summer break for students whose language capacity has not increased according to set targets is also proposed.⁶³⁵

In the context of primary education, additional hours of Greek language learning are also arranged at schools where the number of non-Greek speaking children is deemed particularly high.

An evaluation of the language levels of elementary school students with migration background who had not participated previously in Greek support classes was conducted by the Ministry of Education during 2024 to inform arrangements for the school year 2024-25. The assessment indicated that the vast majority of non-Greek speaking students are in need of such services. The evaluation of the students who had participated in the past in Greek support classes indicated that approximately half of them had significantly improved their Greek levels.⁶³⁶ Further monitoring of the implementation of those measures is required.

Children aged 4 years and 6 months as of 1st of September 2024 old can attend free pre-primary obligatory schooling. For younger children, access to free care is very limited as existing schooling arrangements typically require fees.

Students are expected to succeed in the final exams to proceed to the next grade. Students of the age of 15 and above may also attend evening Greek classes or supplementary classes to certain school subject, offered by the Ministry of Education in the community through life-learning schemes (Adult Education Centres and State Institutes of Further Education) or other EU-funded arrangements.

Linguistic and cultural barriers are still significant obstacles for young students, especially those entering secondary education. The only program offering free English-taught classes to teenagers/young adults refugees and asylum applicants, leading to a high school diploma operated between 2018 and 2021, through a collaboration of UNHCR and a local private educational institution.⁶³⁷

Access of asylum applicants to public and private tertiary education, although not prohibited, is very limited, due to language barriers, financial constraints, lack of scholarship opportunities and lack of supportive measures for those receiving Material reception Conditions.

The provisions of the Refugee Law regarding identifying and addressing special reception needs are not sufficiently met in the case of minors who exit **Pournara** Centre with their families and reside in the community. This is due to a lack of follow-up procedures after the identification of vulnerabilities, which could ensure timely and comprehensive interventions and support, after exiting the Centre. Therefore, special needs of students are usually evaluated and taken into consideration by the Ministry of Education

⁶³⁴ Ministry of Education, Culture and Sports, *Γενικές Οδηγίες Λειτουργίας των Προγραμμάτων Εκμάθησης της Ελληνικής ως δεύτερης Γλώσσας*, September 2024, available in Greek [here](#).

⁶³⁵ Ministry of Education, Youth and Sports, *Δήλωση του Υπουργού Παιδείας, Αθλητισμού και Νεολαίας για την ενίσχυση των διαδικασιών υποδοχής και ομαλής ένταξης των μαθητών/τριών με μεταναστευτική βιογραφία και της ελληνομάθειας*, 21 July 2022, available in Greek at: <https://bit.ly/3JqOA5z>.

⁶³⁶ Ministry of Education, Youth and Sports, *Πρόγραμμα Ελληνομάθειας: Αναμενόμενο το γεγονός ότι το 91.5% των νεοεισερχόμενων παιδιών με μεταναστευτική βιογραφία θα χρειαστεί μαθήματα εκμάθησης της ελληνικής γλώσσας ως δεύτερης γλώσσας*, 7 August 2024, available in Greek [here](#).

⁶³⁷ UNHCR, *UNHCR and the KASA High School join forces for refugee education*, 14 March 2018, available at <https://bit.ly/2VSw6PD>.

upon registration into schools, and sometimes through the intervention of NGOs. Depending on the nature and the seriousness of the disability, different arrangements are offered. The available schemes by the Ministry of Education for students with special needs are: placement in a regular class and provision of additional aid; placement in a special unit which operates within the regular school; placement in a special school (for more severe cases); and placement in alternatives to school settings.

Assessing the needs of children in an adequate manner is time-consuming. In addition, there is often the need to receive important treatments (physiotherapy, occupational therapy, speech therapy) outside of the school context (in public hospital or privately). There are often delays and/or financial constraints in accessing these services.⁶³⁸

Children entering UASC shelters in the middle of a school year are often not placed in school, and the same will apply to children who are close to 18. Instead, they may be referred to evening classes which include Greek, English or French language, mathematics, and computer studies at the State Institutes of Further Education. Those Institutes operate under the Ministry of Education, as lifelong learning institutions.

D. Health care

Indicators: Health Care

1. Is access to emergency healthcare for asylum applicants guaranteed in national legislation?
☒ Yes ☐ No
2. Do asylum applicants have adequate access to health care in practice?
☒ Yes ☒ Limited ☐ No
3. Is specialised treatment for victims of torture or traumatised asylum applicants available in practice?
☐ Yes ☒ Limited ☐ No
4. If material conditions are reduced or withdrawn, are asylum applicants still given access to health care?
☒ Yes ☐ Limited ☐ No

According to the Law, asylum applicants without adequate resources are entitled to free medical care in public medical institutions, covering at a minimum emergency health care and essential treatment of illnesses and serious mental disorders.⁶³⁹ Welfare beneficiaries and residents in the reception centre are indicated as eligible for free medical care and, in that respect, have access to free health care. The level of resources needed to receive free medical care in the case of asylum applicants who do not receive welfare assistance is not specified.

In practice all asylum applicants have free access to public medical institutions, regardless of whether they receive material reception conditions. From May 2022 onwards, asylum applicants during the first year after the application for asylum is submitted are able to access public health institutions just with their Confirmation Letter. A year after the date of the application of asylum, asylum applicants need to apply for a medical card at the Ministry of Health, by submitting a simplified application. Hospital cards are either issued on the spot at the Ministry of Health or can be sent to beneficiaries by post. They are typically valid for one year.

On 1 June 2019, a National Health System (GESY) came into effect for the first time in Cyprus, introducing major differences in the provision of health care services such as the concept of a personal general practitioner (GP) in the community as a focal point for referrals to all specialised doctors. For most of the population (Cypriots, EU citizens, BIPs), health services are now provided almost exclusively under the new health system.

⁶³⁸ Information provided by Cyprus Refugee Council.

⁶³⁹ Article 91Γ(1)(a) Refugee Law.

Asylum applicants, along with other persons that are part of the migrant population, are not included in the provisions of GESY.⁶⁴⁰ Their access to health services continues under the provisions of the previous system, which basically entails treatment by public, in-patient and out-patient departments of the public hospitals and medical centers. The same applies for asylum applicants who are working, despite the fact that since the implementation of GESY, they contribute to GESY as employed persons.⁶⁴¹

With the introduction of GESY, all private pharmacies have been included under the new system and beneficiaries of GESY access a wide range of medications at subsidised cost from private pharmacies. Asylum applicants do not have such access and can only access medications for free or at subsidised cost from public pharmacies situated in the public hospitals and medical centers, however these pharmacies do not provide a wide range of medications, leading to many instances of asylum applicants having to pay for medications or not having access to these, including medications for very serious medical conditions. In many cases NGOs have provided such medications, however with limited capacity to meet the needs.⁶⁴² Access to medication has become a serious gap in the provision of health care to asylum applicants and remained one throughout 2024.

There are no interpretation services available in State hospitals and communication between asylum applicants and medical staff is extremely challenging. Medical staff will often refuse to provide services to an asylum applicant due to lack of means to communicate. Asylum applicants often have limited information on serious medical conditions, including cases involving children. NGOs are often called upon to cover such needs but have very limited capacity to respond to these.

Access to gender-sensitive health care opportunities (including access to female medical personnel, access to a paediatrician, gynaecologist, or prenatal health care and psychosocial support) is limited, even in cases of victims of trafficking, gender-based violence and victims of torture or other forms of psychological and physical violence/ including. There is no information or procedure to make such a request, and even if requested it would depend on availability of medical staff.

Access to mental health care is also problematic and heavily affected by the lack of interpretation services. Asylum applicants have access to State psychologist but not psychologist on GESY, however there is a long waiting list and additionally interpretation services are scarce which significantly restricts access. In 2024, there was a development in accessing a psychiatrist with an interpreter however this often requires intervention from an NGO to be arranged, and in some occasions, NGOs escort the individual and provide interpretation.⁶⁴³ In 2024, the UN Economic and Social Council raised concerns about reports of inadequate access to mental health care, including for refugees, asylum-seekers and migrants and recommended Cyprus ensures funding to improve mental health care services at both the preventive and the treatment levels, including by providing community-based services and programmes, in particular for refugees, asylum-seekers and migrants.⁶⁴⁴

Asylum applicants who need to receive essential treatment which is not available in the RoC are not included in the relevant scheme introduced by the Ministry of Health transposing the Directive on patients' rights in cross-border healthcare. In practice, however, the Ministry has covered the costs, upon approval of the Minister of Health, for many cases of (mainly children) asylum applicants to receive medical treatment outside the country.⁶⁴⁵

In a number of cases, asylum applicants reported to the CyRC that they faced racist behaviour from medical staff, often in relation to their poor Greek language skills and the reluctance of the latter to communicate in English. Such reports continued in 2024.

⁶⁴⁰ Article 16, National Health Law

⁶⁴¹ Information provided by Cyprus Refugee Council.

⁶⁴² Information provided by Caritas Cyprus.

⁶⁴³ Information provided by Cyprus Refugee Council and Caritas Cyprus.

⁶⁴⁴ UN Committee on Economic, Social and Cultural Rights, Concluding observations on the seventh periodic report of Cyprus, October 2024, available [here](#).

⁶⁴⁵ Information provided by Cyprus Refugee Council.

Specialised Health Care

Asylum applicants without adequate resources who have special reception needs are also entitled to free of charge necessary medical or other care, including appropriate psychiatric services.⁶⁴⁶ The Refugee Law incorporates the provision of the recast Reception Conditions Directive in relation to identifying and addressing special reception needs, including for victims of torture.

In practice, the identification of vulnerabilities is conducted mainly in the First Reception Center, **Pournara** (see section: [Identification](#)). The situation is much more challenging in the community due to the lack of a specific mechanism and procedures to timely identify and address those needs. In addition, there are no specialised facilities or services, except for the ones available to the general population within the public health care system. Currently, there is only one NGO, the Cyprus Refugee Council, offering specialised social and psychological support to victims of torture and gender-based violence, operating through the funds of United Nations Voluntary Fund for the Victims of Torture (UNVFVT).⁶⁴⁷ During 2024, 98 persons received relevant services and the fund is renewed for 2025.⁶⁴⁸

E. Special reception needs of vulnerable groups

Indicators: Special Reception Needs

1. Is there an assessment of special reception needs of vulnerable persons in practice?

☒ Yes

☐ No

The Refugee Law defines vulnerable persons in the same way as Article 21 of the recast Reception Conditions Directive:⁶⁴⁹

“[M]inors, unaccompanied minors, disabled people, elderly people, pregnant women, single parents with minor children, victims of human trafficking, persons with serious illnesses, persons with mental disorders and persons who have been subjected to torture, rape or other serious forms of psychological, physical or sexual violence, such as victims of female genital mutilation.”

The law also introduces an identification mechanism which provides that an individual assessment shall be carried out to determine whether a specific person has special reception needs and/or requires special procedural guarantees, and the nature of those needs.⁶⁵⁰ These individualised assessments should be performed within a reasonable time during the early stages of applying for asylum, and the requirement to address special reception needs and/or special procedural guarantees applies at any time such needs are identified or ascertained. However, there are several issues with this screening (for a comprehensive overview, see section on [Identification](#)).

In practice, the identification of vulnerabilities and needs is conducted mainly in the First Reception Center in Pournara ([see section: Identification](#)), however even when vulnerable cases are identified, no official guidelines are available for effectively attending the needs of the identified individuals both while in the Centre and when exiting into the community. In certain vulnerable cases, the SWS arranges temporary accommodation. This, however, is only offered to specific vulnerabilities such as single mothers with young children, pregnant women, persons with serious mental and physical disabilities and only if identified by the vulnerability assessment team. Overall, addressing the needs of vulnerable cases in the

⁶⁴⁶ Article 9ΙΓ(1)(b) Refugee Law.

⁶⁴⁷ Information provided by Cyprus Refugee Council.

⁶⁴⁸ Ibid.

⁶⁴⁹ Article 9ΚΓ Refugee Law.

⁶⁵⁰ Articles 9ΚΔ(a) and 10Α Refugee Law.

community remains extremely problematic and varies greatly, since no defined procedure to guaranty effective support is followed.⁶⁵¹

In 2021, in collaboration with the Mediterranean Institute of Gender Studies (MIGS), UNHCR Cyprus mapped the experiences and impact of sexual and gender-based violence among female and male asylum applicants in the Pournara First Reception Centre and highlighted that 49% of all women assessed were identified as victims of sexual or gender-based violence. The organisations added that the high share can be further contextualised with the higher rate of male arrivals and the higher number of men assessed in the mapping. The study observed a general lack of data on sexual or gender-based violence among asylum-seeking and refugee women and put forward specific recommendations to improve data collection, reception conditions, specialised support services, access to information, housing and accommodation, as well as employment and training.⁶⁵² The findings of the Study remained relevant in 2024 as did the vast majority of the recommendations.

In 2023, the UN Human Rights Committee raised concerns that not all asylum-seekers at Pournara reception centre undergo a vulnerability assessment and recommended that measures are strengthened to ensure early identification, referral, assistance and support for all vulnerable asylum-seekers, including by establishing a formal and comprehensive procedure for identifying, assessing and addressing the specific needs of vulnerable asylum-seekers.⁶⁵³

Victims of Trafficking

The Social Welfare Services operates a specialised shelter for victims of trafficking for sexual exploitation with the capacity to accommodate 15 victims, with the possibility of female asylum applicants, adults or UASC victim of trafficking for sexual exploitation to be placed there. Apart from the State shelter, two NGOs, Wellspring Association and Association for the Prevention and Handling of Violence in the Family, run housing programs, in which victims of trafficking can be accommodated:

- ❖ **Wellspring Association – Transition House:**⁶⁵⁴ A temporary home for women victim of sexual exploitation due to human trafficking, where they receive care and support on a 24-hour basis. The women accommodated there, have the possibility to engage in cooking and confectionery courses, Greek and English courses, as well as life-coaching courses. Moreover, women have the possibility to engage in the second-hand shop of the Association. The long-term goals of the program are rehabilitation and social reintegration. There is a capacity for 6 women.
- ❖ **Association for the Prevention and Handling of Violence in the Family - Sophie's House:**⁶⁵⁵ It is a safe house where adult women or minor girls and their children experiencing domestic violence and sexual exploitation can be temporarily accommodated for protection, support and care purposes. The program offers many services and facilities, incl. transportation to the necessary services (e.g., medical care, mental health care), provision of legal advice, Greek language lessons, specialized officers with the responsibilities to provide children care and supervision, guidance, and consultation to the mother, as well as social workers who make sure that the social and interpersonal difficulties of the mother and child are solved. Additionally, the program secures that all the basic needs of the mother and children are satisfied, such as food and clothing. The long-term goals of the program are rehabilitation and social reintegration. There is a capacity for 10 women with their children.

⁶⁵¹ Information provided by Cyprus Refugee Council.

⁶⁵² UNHCR Cyprus and MISGS, *Sexual and Gender-based Violence among Asylum-Applicants in Cyprus*, 2 December 2021, available at: <https://bit.ly/3JN8LdQ>.

⁶⁵³ UN, CCPR Human Rights Committee, *Concluding observations on the fifth periodic report of Cyprus*, September 2023, available here

⁶⁵⁴ For more information, see Wellspring Association's webpage, available [here](#).

⁶⁵⁵ For more information, see Association for the Prevention and Handling of Violence in the Family – Sophie's House's webpage, available [here](#).

F. Information for asylum applicants and access to reception centres

1. Provision of information on reception

In accordance with the Refugee Law, the Asylum Service must ensure that all asylum applicants are given access to information regarding the asylum procedure, their rights to access material reception conditions, and organisations/services offering legal and social assistance to asylum applicants as well as their legal obligations so as they can maintain their legal status. This information should be provided in the form of a booklet/leaflet in a language the applicant can understand.

In practice, the information available and provided to asylum applicants is that described in the section [Information for Asylum Applicants and Access to NGOs and UNHCR of this report](#).

Three EUAA Info Providers are currently stationed at the **Pournara** First Reception Centre, providing group sessions in the presence of interpreters. The group sessions include information on the registration process in the Reception Centre, the asylum procedure and reception conditions. EUAA staff provide two leaflets developed by the asylum service: one explains the Dublin procedure and one covers the overall asylum procedure. The information provision sessions are offered to adults usually in groups of 10 persons. Responsibility for the UASC is considered to be on the SWS who act as Guardians. An information kiosk was recently set up which provides information to residents by providing appointments to anyone requiring it.

Residents of **Kofinou** Reception Centre are provided information regarding the Centre's operation, their rights/obligations, orally, in groups or individually by the information Provision Expert stationed by EUAA. Regarding **Limnes**, (temporarily relocated as a section of Kofinou due to construction) and according to the EUAA, an information leaflet on the daily operations of the Limnes accommodation centre is made available.⁶⁵⁶

There is no leaflet/information booklet available at the District Welfare offices and District Labour Offices concerning the access of asylum applicants to material assistance and employment. Information concerning employment can be found on the site of the Labour Department.⁶⁵⁷

2. Access to reception centres by third parties

Indicators: Access to Reception Centres

1. Do family members, legal advisers, UNHCR and/or NGOs have access to reception centres?

☐ Yes

☒ With limitations

☐ No

The Refugee Law provides that asylum applicants in reception centers should have the opportunity to communicate with relatives, legal advisors or advocates, representatives of the United Nations High Commissioner for Refugees (UNHCR) and other relevant national, international and non-governmental organizations and bodies.⁶⁵⁸

In practice, asylum applicants living in reception centers can communicate with NGOs and UNHCR by telephone, email and other online platforms and in person if they have freedom of movement. However, given the remote location of reception centres, transportation to the major cities, including Nicosia, is often inconvenient. Residents of **Kofinou** Reception Center are provided with a bus card which allows the use of any route within the cities of Larnaca and Nicosia but not from Kofinou to the city. To travel to a city they require an additional bus card, which is provided upon request to the administration of Kofinou and

⁶⁵⁶ EUAA, *Asylum Report 2022*, available [here](#).

⁶⁵⁷ Ministry of Labour and Social Insurance, *Employment of Asylum Applicants*, available at: <https://tinyurl.com/y8nw5dhs>.

⁶⁵⁸ Article 9IΔ(6) Refugee Law.

requires justification of the purpose of travel; in most cases approval will be given for appointments at governmental departments and medical appointments.

NGO's access to **Kofinou, Pournara and Limnes** (temporarily relocated as a section of Kofinou due to construction) where asylum applicants are residing is restricted. In order to access centers, NGOs must send a request to the Asylum Service which is not always granted and, in most cases, NGOs contracted or in agreement to provide services in a center are provided with access.⁶⁵⁹ Such restrictions are often applied to lawyers or to legal advisors of NGOs when access is requested for the purpose of provision of legal advice or counselling. Specifically regarding **Pournara**, the CPT noted in 2024 that access to Pournara Centre was hindered for some civil society bodies. For others, it was restricted to the provision of limited activities and not the provision of pro bono legal advice.⁶⁶⁰

G. Differential treatment of specific nationalities in reception

Until 2024, no differences in treatment, based on asylum applicants' nationality, were observed. From April 2024 onwards, Syrian nationals that applied for asylum are not permitted to live in the community and receive financial assistance as part of the MRC. Initially, they were transferred from Pournara to the Reception Center in Kofinou, where they were issued with residence orders. From then on, they were allowed to leave Kofinou and reside in the community however, if they opted to do so, access to material reception conditions is reduced and, specifically, they do not have access to the financial allowance. From late 2024 onwards the option is provided before leaving Pournara to move to Kofinou or live in the community without financial assistance, with the majority opting to waive entitlements to the financial allowance and live in the community. No assessment is carried out with regards to risk of destitution.⁶⁶¹

⁶⁵⁹ Statewatch, *Civic space in Cyprus must be protected*, 14 February 2004, available [here](#).

⁶⁶⁰ CPT, *Report to the Government of Cyprus on the visit to Cyprus carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 9 to 17 May 2023*, available [here](#).

⁶⁶¹ Philnews, *Suspension of asylum applications affects thousands*, 16 April 2024, available [here](#).

Detention of Asylum Applicants

A. General

Indicators: General Information on Detention

1. Total number of asylum applicants detained in 2024:	Not available
2. Number of asylum applicants in detention as of the end of 2024:	20 (Menogia)
3. Number of detention centres:	1
4. Total capacity of detention centres:	128 in Menogia, and 197 in holding cells

In Cyprus, asylum applicants are not systematically detained. Asylum applicants, who are detained, are, for the most part, persons who have submitted an asylum application after they were arrested and detained under the presumption that all such applications are submitted in order to frustrate the removal process, even where the persons have recently entered the country (see [Grounds for Detention](#)). In 2024, there was a rise of cases of implicit withdrawals, following failed attempts of the Cyprus Asylum Service to contact asylum applicants for the interview as part of the examination of the asylum application. As a result, people were arrested and detained due to their irregular stay in the country. In other cases, persons have been arrested for an irregular stay in the country and detained or are detained as a consequence of a criminal law sanction and apply for asylum once they are in prison or detention. However, there is always a small number of persons being arrested soon after arriving in the country, even though they presented themselves to the authorities to apply for asylum.⁶⁶²

There is no detention centre for the detention of asylum applicants and asylum applicants can be detained in the Detention Centre **Menogia**, which is a pre-removal detention centre and the only detention centre currently in the country, with a capacity of 128 persons. Asylum applicants may also be detained in holding cells in Police stations across the country. In 2022, 20 police stations were used for this purpose, in 2023, 22 police stations were used with a total capacity of 194 persons. In 2024, 24 police holding cells were used, with total capacity of 197 persons. Out of those 24 police holding cells, only 10 have outdoor areas, which have a capacity of 174 people.⁶⁶³ Holding cells should only be used for periods of 48 hours as the conditions do not permit longer stays. However, due to lack of capacity in Menogia, persons are often detained for long periods in holding cells.⁶⁶⁴

Menogia should only be used to detain persons who are in removal procedures. Therefore, persons who have applied for asylum whilst in a holding cell, and while the detention order is issued based on the Refugee Law, should not be transferred to Menogia, although in practice this is not always adhered to. In 2022 the number of asylum applicants detained in Menogia ranged from 20 to 35 whereas in 2023 the number ranged from 8 to 12 persons at any given point. Specifically, in January 2024, there were a total of 119 persons detained in Menogia, out of which approximately 12 were asylum applicants and in December 2024 there were 20 were asylum applicants.⁶⁶⁵

Asylum applicants' freedom of movement is also restricted while staying in **Pournara**,⁶⁶⁶ and although the duration of stay has been reduced in 2023 and 2024, in comparison to previous years, it is still much longer than the initially planned 72 hours. Moreover, there is no legal basis for the restriction of movement during this time leading to a situation of *de facto* detention (for details on the conditions in Pournara see [Types of accommodation](#)). The CPT considers that placement in Pournara may amount to arbitrary

⁶⁶² Based on observations by the Cyprus Refugee Council.

⁶⁶³ Information provided by Cyprus Police.

⁶⁶⁴ See, CPT, *Report to the Government of Cyprus on the visit to Cyprus carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 9 to 17 May 2023*, p. 46, available [here](#).

⁶⁶⁵ Information provided by the Cyprus Police.

⁶⁶⁶ See AIDA Country Report: Cyprus, 2020 Update and 2021 Update for information on extended stay in Pournara during these periods, available [here](#).

deprivation of liberty, undermining access to basic safeguards against ill-treatment, and could last for an undefined period from several weeks to several months and even longer than a year, leaving detained persons in a state of uncertainty as to how long they would have to wait before release; the situation was worse for minors undergoing age assessments, who on average stayed for more extended periods than the average adult.⁶⁶⁷

B. Legal framework of detention

1. Grounds for detention

Indicators: Grounds for Detention

1. In practice, are most asylum applicants detained
 - ❖ on the territory: ☐ Yes ☒ No
 - ❖ at the border: ☐ Yes ☒ No
2. Are asylum applicants detained in practice during the Dublin procedure?

☐ Frequently
 ☒ Rarely
 ☐ Never
3. Are asylum applicants detained during a regular procedure in practice?

☐ Frequently
 ☒ Rarely
 ☐ Never

In the past, asylum applicants were detained under the Aliens and Immigration Law instead of the Refugee Law, which provides for the detention of asylum applicants in accordance with the recast Reception Conditions Directive. In 2020 and 2021, this practice gradually changed and, with the exception of a limited number of cases, whose specificities will be described below, the majority of asylum applicants are detained under the Refugee Law.

1.1. Detention under the Refugee Law

The Refugee Law prohibits detention of asylum applicants for the sole reason that “he” is an applicant,⁶⁶⁸ and prohibits detention of child asylum applicants.⁶⁶⁹ Detention of asylum applicants under the Refugee Law is based on an administrative order and not a judicial order,⁶⁷⁰ as was previously the case, and is permitted for specific instances that reflect those in the recast RCD. According to the law, unless it is possible to effectively apply less coercive alternative measures, based on an individual assessment of each case, the Minister of Interior may issue a written order to detain the applicant for any of the following reasons:

- ❖ to establish their identity or nationality;
- ❖ to identify those elements on which the application is based, which could not be obtained otherwise in particular when there is a risk of absconding of the applicant;
- ❖ to decide, in the context of a procedure, on the applicant’s right to enter the territory;
- ❖ when held within the scope of the return procedure under Articles 18ΟΓ up 18ΠΘ of the Aliens and Immigration Law, in order to prepare the return and / or carry out the removal process, and the Minister substantiates on the basis of objective criteria, including the fact that the person has already had the opportunity of access to the asylum procedure, that there are reasonable grounds to believe that the person is submitting the application for international protection merely in order to delay or frustrate the enforcement of the return decision;

⁶⁶⁷ CPT, *Report to the Government of Cyprus on the visit to Cyprus carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 9 to 17 May 2023*, available [here](#).

⁶⁶⁸ The female gender has not been included in the Refugee Law, although this was requested by UNHCR and NGOs during consultations carried out prior to the amendment of the Law.

⁶⁶⁹ Article 9ΣΤ Refugee Law.

⁶⁷⁰ Ibid.

- ❖ where necessary to protect national security or public order;
- ❖ in accordance with Article 28 of the Dublin III Regulation.

In addition, in 2018, the Refugee Law was amended to include provisions regulating the detention of asylum applicants under the Dublin Regulation, and, in particular, specifying when there is a significant risk of absconding, in which case the detention of an asylum applicant may be ordered. These include: non-compliance with a return decision; non-compliance with or obstruction of a Dublin transfer, or a reasonably verified intention of non-compliance; the provision of false or misleading information; previous expulsion or return; false statements on the person's address of usual residence; previously absconding; abandonment of a reception centre; unfounded statements in the course of the Dublin interview; deliberate destruction of identity or travel document; and failure to cooperate with the Cypriot authorities with a view to establishing identity or nationality.⁶⁷¹

In general, there is no evidence that there is an effective procedure in place to examine less coercive alternative measures, based on an individual assessment of each case before detention is ordered (see section: [Alternatives to detention](#)).

1.2. Detention under the Aliens and Immigration Law

The Aliens and Immigration Law provides that a person can be detained if declared a “prohibited immigrant” and provides 13 instances in which a person may be declared a “prohibited immigrant”.⁶⁷² When declared a “prohibited immigrant”, a person can be detained under separate provisions of the Aliens and Immigration Law that transpose the Returns Directive,⁶⁷³ for the purpose of return, although the return order is suspended until the asylum application has been decided on.

In the past, asylum applicants were mostly detained as a “prohibited immigrant”. However, from late 2017 onwards, the practice changed: in the majority of cases, once the person has applied for asylum, a new detention order is issued under the Refugee Law under the presumption that the person is submitting the application for international protection merely in order to delay or frustrate the enforcement of the return decision.⁶⁷⁴ The change in practice was also noted in the CAT report on Cyprus.⁶⁷⁵ From 2021 onwards and throughout 2024 the only cases identified where an asylum applicant was detained under the Aliens and Immigration Law were instances where the person was firstly detained, then applied for asylum whilst in detention and there was a delay in issuing the new detention order under the Refugee Law.

Regarding **detention orders** up to 2021, all such orders included only the wording of the article and, although it was stated that an individual assessment had been carried out, there were no individual facts or reasons for detention or any other reference, justification, or findings of an individual assessment. Furthermore, the detention order would refer to “objective criteria” but there was no mention or analysis of what those objective criteria were and how they were applied or justified in the individual case. This raised questions in proceedings before the IPAC and Judges would often comment that the detention orders did not have adequate justification. Detention was not always considered illegal but they instructed the CRMD to review the detention orders.⁶⁷⁶ As a result, since late 2021 till this day, detention orders now list the reasons for detention, for example, illegal entry, due to a delay in applying for asylum, because of a conviction for criminal offence, or due to a lack of travel document or address. However, there is no

⁶⁷¹ Article 9ΣΤ-bis Refugee Law, inserted by Law No 80(I)/2018 of 12 July 2018.

⁶⁷² Article 6(1) Aliens and Immigration Law.

⁶⁷³ Article 18ΠΣΤ Aliens and Immigration Law.

⁶⁷⁴ Article 9ΣΤ (2)(δ) Refugee Law.

⁶⁷⁵ UNCAT, *Concluding Observations on the Fifth Report of Cyprus*, Committee against Torture, 23 December 2019, available at: <https://tinyurl.com/3jcjevns>

⁶⁷⁶ Information provided from the Cyprus Refugee Council and derived from reviewing IPAC decisions, e.g., A.H Κυπριακής Δημοκρατίας, μέσω Διευθυντή Τμήματος Αρχείου Πληθυσμού και Μετανάστευσης, 29 January 2021, available in Greek at: <https://bit.ly/3MEIm2E>.

mention of the facts of the case or an individual assessment on how these reasons justify detention. The situation remained the same in 2022, 2023 and 2024.

Asylum applicants are mainly detained on the territory and rarely at entry points (ports, airports). Cyprus, being an island, has no external borders. People apprehended by the police within RoC territory before applying for asylum are often arrested for irregular entry and/or stay, regardless of whether they were intending to apply for asylum, even if they were on their way to apply for asylum and have only been in the country for a few days.

In 2024, there have been 845 cases of persons entering the Republic of Cyprus apprehended at the airports (Larnaka International Airport and Paphos Airport), 8 of whom applied for asylum while in detention at the airports. Other instances of arrests taking place at the airports of Cyprus, concern persons attempting to fly to another EU member state by presenting false documents or impersonating to be the holder of a genuine document, with the intention to apply for asylum, using the Republic of Cyprus merely as a transit country.⁶⁷⁷ In some cases, persons are arrested before departing from Cyprus whilst others are identified upon arrival at the other EU member state and are returned to Cyprus, arrested upon arrival and apply for asylum while detained.⁶⁷⁸

The vast majority of asylum applicants enter Cyprus through the territories that are not under the effective control of the RoC (see section on [Access to the Territory](#)) and then cross the “green line” into the areas under the effective control of the RoC in an irregular manner. The “green line” is not considered a border, and even the crossing points are not considered official “entry points”. There are no detention facilities near the “green line”.

During the determination procedure to identify the Member State responsible under the Dublin Regulation, the applicant has the right to remain and enjoys the rights afforded to applicants for international protection.⁶⁷⁹ In practice, if a person arrives in Cyprus and there is a possibility that another Member State is the responsible for examining their request, they are considered an asylum applicant and enjoy all such rights and will not be detained for this reason alone. Dublin returnees may be detained upon return including persons whose final decision has not been issued.⁶⁸⁰

2. Alternatives to detention

Indicators: Alternatives to Detention

1. Which alternatives to detention have been laid down in the law?
☒ Reporting duties
☐ Surrendering documents
☒ Financial guarantee
☒ Residence restrictions
2. Are alternatives to detention used in practice?
☐ Yes ☒ Rarely ☐ No

The Aliens and Immigration Law refers to alternatives to detention and states that detention is used as a last resort, yet alternatives to detention are not listed and the relevant article is rarely implemented in practice.⁶⁸¹ The Refugee Law includes a non-exhaustive list of recommended alternatives to detention:⁶⁸²

- ❖ Regular reporting to the authorities;
- ❖ Deposit of a financial guarantee;

⁶⁷⁷ Cyprus Police, *Meeting to address incidents of impersonation and presentation of false travel documents at Cyprus airports* available [here](#).

⁶⁷⁸ Information provided by Cyprus Refugee Council.

⁶⁷⁹ Article 9(1)(b) Refugee Law.

⁶⁸⁰ Information based on monitoring visits carried out by the Cyprus Refugee Council to the Kofinou Reception Centre.

⁶⁸¹ Article 18ΠΣΤ Aliens and Immigration Law.

⁶⁸² Article 9ΣΤ(3) Refugee Law.

- ❖ Obligation to stay at an assigned place, including a reception centre; and
- ❖ Probation.

The CRMD is responsible for assessing whether alternatives to detention may be applied. However, these are not subject to a statutory time limit or a proportionality test and there are no implementing regulations or guidelines for their application. Due to this, it is not clear how alternatives are implemented and, even though detention orders issued under the Refugee Law refer to an individualised assessment and the CRMD states that such assessments are indeed carried out, an extremely small number of detainees are released by implementing alternatives.⁶⁸³

The decision to detain is not based on an assessment of the asylum applicant's individual circumstances or the risk of absconding, and the CRMD issues and renews detention and deportation orders simultaneously, without considering less restrictive alternatives to immigration detention.⁶⁸⁴ This applies to all detainees, including asylum applicants, whose cases may still be pending.

The IPAC has raised issues related to the examination and implementation of alternatives to detentions in appeals challenging detention based on the Refugee Law,⁶⁸⁵ such as the lack of an individual assessment and consideration of less restrictive measures.⁶⁸⁶ Furthermore, the IPAC has highlighted the need for an individual assessment of detention in line with the principles of proportionality and necessity.⁶⁸⁷ In cases ΔK 45/20⁶⁸⁸ and ΔK 105/21,⁶⁸⁹ the IPAC conducted an individual assessment of the personal situation and behaviour of the applicants to find that, even though the goal pursued by detention (ultimately, the non-interference with the removal process because of the submission of an asylum application) was justified and legitimate, detention was not the proportionate measure to achieve that goal for those specific applicants. The Court ordered the release of the applicants and imposed reporting duties as an alternative measure. In case ΔK 9/2022, the IPAC found that the fact that there is no permanent registered address or that the Applicant was convicted of circulating a forged document was not sufficient justification to maintain his detention and alternative restrictive measures could be imposed on him instead of detention. In 2024, the IPAC has continued to issue decisions related to the examination and implementation of alternatives to detentions.⁶⁹⁰ however, the Court decisions have not affected change in the examination and implementation of alternatives to detention.⁶⁹¹

In the 2019 report by the Committee Against Torture (CAT) on Cyprus, it was mentioned that 'the Committee remains concerned by the criminalisation and routine detention of irregular migrants, the extended periods of detention of such migrants, and the functioning of the migration detention facilities throughout the country'. Furthermore, it is stated that 'the Committee is concerned that no comprehensive identification procedures are in place to ensure the sufficient and timely identification of vulnerable persons prior to ordering detention'. Recommendations include for Cyprus to 'Adopt regulations to fully and consistently implement the provisions of the Refugee Law providing for alternatives to detention, establish comprehensive procedures for the determination and application of alternatives to detention,

⁶⁸³ Information based on monitoring visits to Menogia Detention Centre by the Cyprus Refugee Council and interventions carried out as part of the case management under the Pilot Project on the Implementation of alternatives to detention in Cyprus. See European Alternatives to Detention Network's webpage available at: <https://bit.ly/3cJ2v6C>.

⁶⁸⁴ See FWC, *Promoting and Establishing Alternatives to Immigration Detention in Cyprus*, November 2016, available in Greek at: <http://bit.ly/2kAN5aG>, pp. 44-45. See also summary in English at: <http://bit.ly/2jEHGLz>.

⁶⁸⁵ Article 9ST (2)(δ) of the Refugee Law.

⁶⁸⁶ *G.N. v. The Republic*, ΔΔΠ 155/2019 (5/11/2019); *T.E.V. v the Republic*, ΔΔΠ 270/2019 (8/11/2019).

⁶⁸⁷ *A.H. v. Republic of Cyprus* Case No. ΔK 73/2020, 29/1/2021.

⁶⁸⁸ *S.R. v. Republic of Cyprus*, Case No. ΔK 45/20, 17/11/2020.

⁶⁸⁹ *M.R. v. Republic of Cyprus*, ΔK 105/21, 15/11/2021.

⁶⁹⁰ *EUAA case law database, CY: The IPAC annulled the detention order of a Nigerian applicant based on reasons of 'public order' as it was imposed without respecting the principles of necessity and proportionality*, available [here](#).

⁶⁹¹ Information provided by Cyprus Refugee Council.

and ensure that these be considered prior to resorting to detention, as part of an overall assessment of the necessity, reasonableness and proportionality of detention in each individual case'.⁶⁹²

The UN Human Rights Council in their Universal Periodic Review (UPR) in 2019 also recommended to the Cypriot State to 'facilitate the integration of migrants and persons under international protection residing in Cyprus, put in place alternatives to long-term detention of asylum applicants, including those whose request for asylum has been rejected'.⁶⁹³

In 2023, the UN Human Rights Committee recommended that Cyprus should take all the measures necessary to enhance protection of refugees and asylum-seekers and, to this end, it should ensure that the detention of migrants and asylum-seekers is only used as a measure of last resort and is reasonable, necessary and proportionate, in accordance with the Committee's general comment No. 35 (2014) on liberty and security of person, and that alternatives to detention are used in practice.⁶⁹⁴

From July 2019 until mid-2023, the CyRC implemented a third EPIM-funded project on ATD in Cyprus - "Safeguarding Alternatives to Detention: Implementing Case Management in Cyprus", which builds on the progress and achievements of the 2017-2019 Pilot.⁶⁹⁵ Its main objectives were to reduce immigration detention, promote engagement based ATD and contribute to the growing evidence and momentum on ATD at a national and regional level. The project team provided individualised case management to persons in detention and/or at risk of detention including asylum applicants, rejected asylum applicants, irregular TCNs, and non-removable. With the conclusion of the EPIM funded project, CyRC continues to promote engagement based ATD throughout 2024 by providing case management to persons in detention or at risk of detention.⁶⁹⁶

In 2023 and currently, there are two officers appointed by the CRMD who examine cases of detention, including the possibility of alternatives to detention. One officer is responsible for persons detained under the Aliens and Immigration Law and the other officer for persons detained under the Refugee Law. The CRMD officers conduct an examination every 2 months for each case; however it is unclear how these examinations are conducted. The examination seems to focus on whether the reasons justifying detention in the initial detention order remain valid and in the vast majority of cases the initial justification is repeated. The CyRC continues to communicate cases with recommendations for ATD however, the use of alternatives to detention remains extremely low.⁶⁹⁷

Overall "alternatives to detention" is rarely if ever examined prior to detention being ordered. As in previous years throughout 2024, alternatives to detention were ordered in an extremely low number of cases. Most cases of asylum applicants that are released from detention on alternatives to detention, concern detainees who challenge their detention order in Court successfully or detainees that have challenged their detention order before Court and as a result the CRMD cancels the detention order and issues a new decision, ordering alternatives to detention before the Court issues a decision.⁶⁹⁸

⁶⁹² UNCAT, *Concluding Observations on the Fifth Report of Cyprus*, Committee against Torture, 23 December 2019, available at: <https://tinyurl.com/3jcjevns>.

⁶⁹³ UN Human Rights Council, *Report of the Working Group on the Universal Periodic Review: Cyprus*, Twenty seventh session, April 2019, available at: <https://bit.ly/442rPNU>.

⁶⁹⁴ UN, CCPR Human Rights Committee, *Concluding observations on the fifth periodic report of Cyprus*, September 2023, available [here](#)

⁶⁹⁵ Implemented by FWC from March 2017-December 2017.

⁶⁹⁶ Information provided by Cyprus Refugee Council.

⁶⁹⁷ Ibid.

⁶⁹⁸ Ibid.

3. Detention of vulnerable applicants

Indicators: Detention of Vulnerable Applicants

1. Are unaccompanied asylum-seeking children detained in practice?
☐ Frequently ☐ Rarely ☒ Never
❖ If frequently or rarely, are they only detained in border/transit zones? ☐ Yes ☐ No
2. Are asylum seeking children in families detained in practice?
☐ Frequently ☐ Rarely ☒ Never

The Refugee Law prohibits the detention of all asylum-seeking children.⁶⁹⁹

Under the Aliens and Immigration Law, there are no provisions relating to the detention of children, except for those that transpose the Returns Directive, according to which children can be detained as a last resort and for the least possible time.⁷⁰⁰ In practice, children are not detained. The only instances where children have been detained is in cases where unaccompanied children were arrested with false/forged documents that show them to be over 18, and usually in an attempt to leave the country with these documents. In such instances, they are detained as adults and will most probably be released if sufficient evidence is provided that they are in fact under 18, especially if an NGO intervenes.⁷⁰¹ In recent years no such cases have been identified.

Detention of vulnerable persons is not prohibited, and victims of torture, trafficked persons, and pregnant women are detained with no special safeguards. Indeed, due to the lack of an effective identification mechanism, of individual assessment, and a reluctance to implement alternatives to detention, vulnerable asylum applicants are often identified while in detention. Even when these cases are communicated to the MD, they are not released, including asylum applicants who have recently arrived in the country and where there is sufficient evidence that they intend to remain engaged with the procedures.⁷⁰²

In a 2023 case the IPAC ordered the release of an asylum applicant from Cameroon who was detained on the basis that her asylum application was submitted solely to obstruct her return although she was arrested immediately upon entering RoC. The IPAC accepted that there was no evidence justifying the detention of the applicant and found among other things, a note in her file indicating that she was a victim of violence in her country of origin which was inconsistent with the legal basis of the detention and thus problematic.⁷⁰³

⁶⁹⁹ Article 9ΣΤ(1) Refugee Law.

⁷⁰⁰ Article 18ΠΓ(1) Aliens and Immigration Law.

⁷⁰¹ Information provided by Cyprus Refugee Council.

⁷⁰² Information based on monitoring visits to Menogia Detention Centre by the Cyprus Refugee Council and interventions carried out as part of the case management under the Pilot Project on the Implementation of alternatives to detention in Cyprus. See European Alternatives to Detention Network's webpage, available at: <https://bit.ly/3cJ2v6C>.

⁷⁰³ *A.M.A. v. Republic of Cyprus*, Case No. ΔΚ 33/2023, 5 January 2023, available in Greek at: <https://tinyurl.com/mrnemv5y>.

4. Duration of detention

Indicators: Duration of Detention

- | | |
|--|-----------|
| 1. What is the maximum detention period set in the law (incl. extensions): | |
| ❖ Pre-removal detention | 18 months |
| ❖ Asylum detention | None |
| 2. In practice, how long in average are asylum applicants detained? | n/a |

The Refugee Law allows the detention of asylum applicants subject to no time limit. Therefore, in most cases persons will remain in detention until they are deported, they opt to leave voluntarily or receive international protection. A limited number of cases will be released based on a Court Order.

When a person that is already detained applies for asylum, a new detention order is issued under the Refugee Law under the presumption that the person is submitting the application for international protection merely in order to delay or frustrate the enforcement of the return decision. As a result, their detention also has no time limit.⁷⁰⁴

Once detained, an asylum applicant will in most cases remain detained for the duration of the asylum procedures. For asylum applicants detained in **Menogia** Detention Centre, the duration of the first instance examination of the asylum application is on average 2 months, whereas if detained in a holding cell it may take longer. Furthermore, if an appeal is submitted before the IPAC against a negative decision on the asylum application the duration of detention will be prolonged/delayed. Duration of detention has remained an issue throughout 2024, especially if one does not challenge their detention at court. If one does not submit an appeal against the detention order issued against them, it is very rare that an asylum applicant would be released following a decision from the Migration Department.

In early 2021, the Supreme Court decided on a *Habeas Corpus* application of a **Syrian** national detained for reasons of “national security”.⁷⁰⁵ The applicant had been detained for 21 months during which his asylum application had been examined and he had been excluded from Subsidiary Protection, as he was considered to be a threat to national security due to his participation in a terrorist group. He appealed the exclusion decision, appeal that was still pending, and thus was still considered to be an asylum applicant. The Court ordered his release as he could not be returned to **Syria**. The criminal investigation of his case had been concluded on 3 February 2020: no criminal proceedings had been ordered, and no other actions taken in relation to the terrorist charges, therefore his detention could no longer be justified.

In November 2022, the Supreme Court⁷⁰⁶ ordered the release of a Syrian asylum applicant who was detained for reasons of ‘national security or public order’ when the police discovered photos he had posted on his Facebook account showing himself holding a gun and wearing the uniform of terrorist organisations. The Asylum Service found that he met the criteria to be recognised as a refugee since his return to Syria entailed risks of persecution; he was nevertheless deemed ineligible for an international protection status because of his involvement in extremist armed groups; his asylum application was rejected. The applicant appealed against the rejection and, through a separate application, challenged his detention through an application for habeas corpus. In the application, he requested disclosure of the documents and information which the authorities had in their possession, which according to the authorities, justified his continued detention. The trial court rejected his application for habeas corpus, stating that the applicant already knew the reasons for his detention, namely his social media posts implicating him with terrorist organisations. He appealed the first instance rejection of his habeas corpus application arguing that the failure of the authorities to disclose the information on the basis of which they detained him infringed the principle of equality of arms and his right to a fair trial, in violation of the EU Charter for Fundamental Rights and the ECHR. The Appeal Court set aside the trial court decisions that

⁷⁰⁴ Information provided by Cyprus Refugee Council.

⁷⁰⁵ Supreme Court Application 177/2020, 24 February 2021 available in Greek at: <https://bit.ly/316sMoA>.

⁷⁰⁶ Supreme Court, Appeal, Application 15/22, 17 November 2022, available in Greek at <https://bit.ly/3ln9FEH>.

rejected the *habeas corpus* application and ordered the applicant's release from detention, on the ground that the authorities failed to adequately and accurately justify why the applicant was seen as a risk to national security. As a result of the authorities' failure to justify why the applicant's detention for 14 months was necessary, his detention was rendered unlawful and the habeas corpus order was issued.

In 2023, the Supreme Court again ordered the release of a Syrian asylum applicant who was detained for 1 year for reasons of 'national security or public order' based on indications that he was a member of a terrorist organisation. The Court found that no actions had been taken by the authorities to investigate or support these claims and neither were any steps taken to examine his asylum application. The Court found the duration of his detention to have been unreasonably prolonged and therefore unlawful and ordered his immediate release.⁷⁰⁷

Similar cases have been brought before the Supreme Court in 2024, where the Court found once again found that no actions had been taken by the authorities to either investigate or support claims and neither had any steps been taken to examine the detainee's asylum application.⁷⁰⁸

The above-mentioned court decisions have not had an impact on the policies or practices that are followed with regard to the length of detention, which continues to be indefinite.⁷⁰⁹

C. Detention conditions

1. Place of detention

Indicators: Place of Detention

1. Does the law allow for asylum applicants to be detained in prisons for the purpose of the asylum procedure (i.e., not as a result of criminal charges)? ☐ Yes ☒ No
2. If so, are asylum applicants ever detained in practice in prisons for the purpose of the asylum procedure? ☐ Yes ☒ No

Asylum applicants may be detained in the Detention Centre of **Menogia** or in **Police Holding Cells (PHC)**. Furthermore, a limited number of asylum seekers are at times detained at the holding facilities at Larnaca and Paphos International Airports.⁷¹⁰

The Detention Centre of Menogia, located in the district of Larnaca, started operating in January 2013 to detain persons under return procedures. However, it is also used for the detention of asylum applicants. The official capacity of Menogia was initially 256 but has been lowered to 128, following recommendations made by monitoring institutions such as the Ombudsman's Office and the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT).⁷¹¹ Since its operation, there have been no issues of overcrowding, however this is due to detainees being held in PHC where conditions are often sub-standard. In the detention centre, asylum applicants are always detained with other third-country nationals as well as EU nationals pending removal.

⁷⁰⁷ Supreme Court, Application 101/2023, 15 September 2023, available in Greek at: <https://tinyurl.com/5a73w5fz>.

⁷⁰⁸ Supreme Court, Application 183/2024, 5 December 2024, available [here](#).

⁷⁰⁹ Information provided by Cyprus Refugee Council.

⁷¹⁰ CPT, *Report to the Government of Cyprus on the visit to Cyprus carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 9 to 17 May 2023*, available [here](#).

⁷¹¹ CPT, *Report on the visit to Cyprus from 23 September to 1 October 2013*, CPT/Inf (2014) 31, 9 December 2014, available at: <https://bit.ly/3xAXtWq>.

In addition to Menogia, third-country nationals, including asylum applicants, can also be held in police station holding cells (PHC) around the country, supposedly for short stays but in practice often used for lengthy stays. In 2024, 24 police holding cells were used, with total capacity of 197 persons.⁷¹² In police stations, asylum applicants may also be held with persons detained for committing an offence and awaiting their trial, although they will be accommodated in separate cells. Furthermore, persons detained for serious criminal offences will usually be transferred to the pre-trial unit at the Central Prison once the Court has ordered their detention. Out of the 24 PHC, only 10 have outdoor areas and these 10 PHC have a capacity of 174 persons.

On 26 March 2019, the European Court of Human Rights (ECtHR) delivered its judgment in the case *Haghilo v. Cyprus* (47920/12) regarding the detention pending deportation of an **Iranian** national, who had been detained for over 18 months in three police stations. The Court ruled that the applicant's detention had been unlawfully extended after the expiry of the six-month period. It found that the detention measure was not in accordance with domestic law and, therefore, violated Article 5 (1) ECHR. On the complaint under Article 3, the Court observed that the applicant had been held for a significant amount of time in detention, in police stations designed to accommodate people for a short time only. The buildings lacked the facilities necessary for long detention, such as the possibility of outdoor activity. It noted the specific material conditions of the detention under review, such as the lack of day light, fresh air, and the small size of the cells in each station, detailed in reports provided by experts and the Ombudsperson. Referring to its case law, the ECtHR held that the applicant was subjected to hardship beyond the unavoidable level of suffering inherent in detention and that it amounted to inhuman and degrading treatment prohibited by Article 3.⁷¹³

Since 2020, there has been a substantial rise in the use of holding cells. There has been no official justification for the increase of use of police holding cells, however it seems to be due to the lack of space in Menogia. The national Ombudsman acting as National Preventive Mechanism of Torture raised the issue in various reports,⁷¹⁴ the latest being a report in September 2020, based on a monitoring visit of a Pafos police station.⁷¹⁵ The report states, among other things, that holding cells should not be used for purposes of immigration detention and that persons must be transferred to Menogia within 48 hours. No improvement was noted after the issuance of the report.⁷¹⁶ In addition, due to lack of clear procedures with regards to access to asylum or court procedures, there seems to be a delay in responding to requests made by persons expressing their intention to apply for asylum while being detained in a holding cell, or asylum applicants wishing to access the court with the aim of challenging their detention.⁷¹⁷ The situation remains the same in 2024.

The use of PHC was referred to by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) in its 2024 report on Cyprus, stating that “[d]espite repeated recommendations issued by the CPT since its first visit to the country in 1992, Cyprus has continued to use police stations and detention centres for holding irregular migrants under the aliens and immigration law for longer than 24 hours”.⁷¹⁸

⁷¹² Information provided by the Cyprus Police.

⁷¹³ ECtHR, *Haghilo v. Cyprus* (Application No.47920/12), 26 March 2019. See summary available at EDAL website at: <https://bit.ly/2Uru0Zh>.

⁷¹⁴ Reports-Recommendations of the Office of the Commissioner of Administration in its capacity as a National Mechanism for the Prevention of Torture, File Numbers: Ε.Π.Μ. 1. 02. (4/10/2019), Ε.Π.Μ. 2. 11. (10/10/2019), Ε.Π.Μ. 2.14 (24/07/2019), ΑΥΤ. 2/2020 (04/09/2020) και ΕΜΠ 2.15. (24/09/2020) *Εκθέσεις-Εισηγήσεις* του Γραφείου Επιτρόπου Διοικήσεων υπό την ιδιότητα ως *Εθνικός Μηχανισμός Πρόληψης των Βασανιστηρίων*, Αριθμός Φακέλων: Ε.Π.Μ. 1. 02. (4/10/2019), Ε.Π.Μ. 2. 11. (10/10/2019), Ε.Π.Μ. 2.14 (24/07/2019), ΑΥΤ. 2/2020 (04/09/2020) και ΕΜΠ 2.15. (24/09/2020).

⁷¹⁵ Ombudsman, *Report on Police Holding Cells in Pafos*, 1 September 2020, available in Greek at: <https://bit.ly/3cD8ycF>.

⁷¹⁶ Information provided by the Cyprus Refugee Council.

⁷¹⁷ Ibid.

⁷¹⁸ CPT, *Report to the Government of Cyprus on the visit to Cyprus carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 9 to 17 May 2023*, available [here](#).

Regarding the holding facilities at Larnaca and Paphos International Airports, the conditions of detention in both holding facilities are considered only acceptable for holding persons for a few hours as repeatedly stated in reports by the national Ombudsman and the CPT.⁷¹⁹ However, in 2024, cases were still reported of persons including asylum applicants being detained at the airports for periods reaching weeks and months.⁷²⁰ The authorities consider that detainees cannot be moved to another detention facility as they have been refused landing and entry into the territory.⁷²¹ In 2024, in a habeas corpus application brought before the Supreme Court challenging the detention of an asylum supplicant detained at Larnaca Airport due to refused entry, the Court found that the detention had been illegal from the submission of an asylum application, as there was no detention order under the Refugee Law and the applicant was denied their rights as an asylum applicant.⁷²²

2. Conditions in detention facilities

Indicators: Conditions in Detention Facilities

1. Do detainees have access to health care in practice?

☒ Yes
☐ No

❖ If yes, is it limited to emergency health care?

☐ Yes
☒ No

2.1. Overall living conditions

State of the facilities

Menogia Detention Centre, as well as the holding cells in the police stations and the airports, are under the management of the Police, therefore the guards are police officers. In 2024, the staff of Menogia Detention Centre was comprised of 20 police officers working 12-hour shifts, as well as a 13-person cleaning crew. In addition, the following staff is stationed at Menogia: an examiner of asylum applications of the Asylum Service, two Frontex officers, 3 Immigration liaison officers (one per 12-hour shift during the day), a full-time doctor (working there on weekdays between 08:30am-15:30pm). There is also one nurse available on a 24-hr basis (working in shifts) as well as one mental health nurse during office hours. Furthermore, there is a resident psychologist working there once a week during office hours. Detainees who seek psychiatric assistance, or other specialised medical assistance, must make an appointment with the doctor, who then refers them to the psychiatrist at the General Hospital of Larnaca district if needed.⁷²³

Currently and continuing from 2022 the Red Cross is implementing a program once a week through which psychology University students provide psychosocial support. In addition, material support is provided, such as clothes donations as well as sanitary products and toiletries.

719

Ibid.

720

Ombudsman/Commissioner for Administration, *Report on the visit dated 22 November 2024 to the detention area in Larnaca Airport of persons who were not allowed to enter the Republic*, 28 November 2024, available in Greek [here](#). See also, Philenews, *Commissioner for Administration: Immediate transfer of the African couple detained for two months at Larnaca airport*, 28 November 2024, available in Greek [here](#). Alphanews, ‘Images of shame: Detainees locked up for months at Larnaka airport’, 7 March 2025 available in Greek [here](#).

721

Cyprus Government, *Response of the Government of Cyprus to the report of the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) on its visit to Cyprus in 2017*, available at CPT/Inf (2018) 17.

722

Supreme Court, Application AP. 224/2024, 23 January 2025, available [here](#); Philenews, *The foreigner who was confined at Larnaca airport is free – What did the Supreme Court decide?*, available [here](#).

723

Information provided by the Cyprus Refugee Council.

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In recent years, there have been noticeable improvements to the living conditions in **Menogia**,⁷²⁴ following recommendations made by the CPT, the Committee against Torture (CAT),⁷²⁵ and the Ombudsman's Office. There are thus less complaints about custodial staff behaviour, food, or outdoor access. However, as reported by the Council of Europe Commissioner for Human Rights, detainees in Menogia complain about the lack of activities, as well as the length of their detention, some of them having being detained in the past.⁷²⁶ The Commissioner also noted that detainees deprived of their liberty for months without any prospect of either deportation or release do not understand the purpose of their continuous detention and feel treated as criminals.⁷²⁷ This leads to high levels of stress, and has resulted in several hunger strikes in Menogia in recent years, mostly by irregular migrants and rejected asylum applicants, along with a few asylum applicants.⁷²⁸

The situation remained the same in 2024 with the CPT noting that some renovations had occurred such as upgraded exercise yards and a new secure perimeter fence, but little had been done to mitigate the carceral environment. The strict rules accentuated the prison-like atmosphere, as did the distant and impersonal staff-detainee relations, with staff remaining outside the unit doors apart from routine rounds and with a limited regime of activities in place. The CPT maintains that the environment remains unnecessarily restrictive, given the nature and purpose of the administrative detention of migrants.⁷²⁹

There are no serious deficiencies as to the sanitary facilities provided, except from occasional reports of some toilets and showers being faulty. Most detainees are satisfied with the general state of the facilities and have mentioned that there is hot water and that they can shower at ease without time restrictions.⁷³⁰ Overall, the cleanliness of the detention centre seems to be of a decent standard. Cleaners are present in the Centre 7 days a week, and the communal areas such as toilets, showers and TV rooms in each block are cleaned twice daily. Furthermore, prior to 2018, washing machines for clothes operated two or three times a week; however, following, a scabies outbreak, it was decided to give detainees 24/7 access to washing machines.⁷³¹

Since Menogia began operating, there have not been any reports regarding overcrowding. The overall capacity was initially deemed to be too high and conditions in the cells/rooms that accommodate detainees are cramped, as there were eight persons/four bunk beds in an 18m² room. The capacity was reduced from 256 to 128 places, after a CPT recommendation in 2014⁷³² and the cells/rooms now accommodate four persons with two bunk beds per room. However, in early 2025, it was noted that out of the 4 wings, the 3, which are designated for male detainees, have been admitting a larger number than the normal capacity. As a result of PHC being constantly full, Mennogia occasionally takes in more detainees than their protocol provides. This usually happens for a short period of time, with people who are scheduled to be deported soon after they are placed in Mennogia.⁷³³

⁷²⁴ CoE Commissioner for Human Rights, *Report by Nils MUIŽNIEKS, Commissioner for Human Rights of the Council of Europe following his visit to Cyprus from 7 to 11 December 2015*, 31 March 2016, para 1.3.2, available at: <https://bit.ly/4aFYBqq>. See also KISA, *Improvements regarding detention conditions – significant problems regarding detention and deportation practices*, 29 January 2017, available at: <http://bit.ly/2JhL82>.

⁷²⁵ CAT, *Concluding Observations on the Fourth Report of Cyprus*, 21 May 2014, available at: <http://bit.ly/2jEBJOC>.

⁷²⁶ CoE Commissioner for Human Rights, *Report by Nils MUIŽNIEKS, Commissioner for Human Rights of the Council of Europe following his visit to Cyprus from 7 to 11 December 2015*, 31 March 2016, para 1.3.2, available at: <https://bit.ly/4aFYBqq>.

⁷²⁷ Ibid.

⁷²⁸ See KISA, *Abuse of power is leading detained migrants to desperate acts*, 5 April 2016, available at: <http://bit.ly/2jmsIOB>.

⁷²⁹ CPT, *Report to the Government of Cyprus on the visit to Cyprus carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 9 to 17 May 2023*, available [here](#).

⁷³⁰ Information based on monitoring visits carried out by the Cyprus Refugee Council.

⁷³¹ Ibid.

⁷³² CPT, *Report to the Government of Cyprus on the visit to Cyprus carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 23 September to 1 October 2013*, CPT/Inf (2014) 31, 9 December 2014, available at: <https://bit.ly/3xAXtWq>.

⁷³³ Information based on monitoring visits carried out by the Cyprus Refugee Council.

The provision of clothing in Menogia has improved in recent years, with the Red Cross Cyprus as well as other volunteer organisations providing clothes. Even police officers donate their own old clothes to detainees. Moreover, upon arrival, detainees are provided with a sanitary package, which includes soap, shampoo, razor blades for men and sanitary products for women. However, detainees are expected to pay for their own products, such as shampoos, sanitary products, water and other snacks throughout their time spent there. Police officers provide detainees with the opportunity to fill out a shopping list and officers either make a shopping run or place orders at the nearby market.⁷³⁴

Detainees in **Menogia** including asylum applicants have access to open-air spaces. The size of the outdoor space is approximately the size of a basketball court. At noon, detainees are allowed to spend a minimum of one hour and half in the courtyard; each wing given a different time slot.

Regarding food detainees are provided with 3 meals a day. Breakfast usually includes toast with butter; lunch typically includes legumes or pasta; and some kind of meat with a side of rice or potatoes is served for dinner.

In **Menogia**, detainees mentioned that pork is not included in the menu and that the meat provided is mainly chicken.⁷³⁵ It was also mentioned that, during Ramadan, religious dietary requirements are accommodated. Other dietary needs for medical reasons are also accommodated. Regarding both quality and quantity, the level of satisfaction varied among detainees. Some detainees mentioned that the food tends to be repetitive for prolonged periods of time, with only the side dish varying. In 2020, there were increased complaints regarding food, with reports of finding insects in the salad or tiny stones in dishes with beans. After voicing complaints, the issue was raised with the catering company and in early 2021 detainees noted improvements. Food quality is frequently monitored by the officers receiving it, and all detainee complaints with regards to the quality of the food are addressed. Throughout 2024, no complaints were received from monitoring visits regarding the quality of food.

Some detainees drink tap water that is available at the centre (safe to drink in Cyprus). However, the majority purchase water from a mini market close to the Centre. In 2023, a water fountain was installed in each wing to encourage use of tap water. For purchases outside the Centre, there is a procedure to order items and the costs are covered by the detainees.

Conditions in the **holding cells** of the various police stations vary but are overall considered to be sub-standard. In a report issued by the Ombudsman's Office following a monitoring visit in **Oroklini**, Larnaca, the conditions were found to be below accepted standards and included issues related to lack of access to outdoor spaces, cleanliness and hygiene facilities, access to information, and access to remedies.⁷³⁶ A similar report was issued in September 2020, again by the Ombudsman's Office, based on a monitoring visit of a **Pafos** police station.⁷³⁷ The recommendations included not using holding cells for purposes of immigration detention and moving persons to **Menogia** within 48 hours; increasing access to telephone and online communication; fixing doors to cells to ensure privacy; posting in every cell the rights of detainees; creating an entertainment area; and improving/fixing infrastructure on hygiene facilities. Finally, the report stated that the practice of making detainees clean hygiene facilities must be terminated.

Regarding access to open-air spaces for detainees in holding cells, the situation varies. Many lack sufficient open-air spaces and there are reports of detainees having extremely limited time outside. This is especially problematic for detainees during Ramadan, as observed from recent cases in March 2024,

⁷³⁴ Information based on monitoring visits carried out by the Cyprus Refugee Council.

⁷³⁵ Ibid.

⁷³⁶ Ombudsman, *Έκθεση ως Εθνικός Μηχανισμός Πρόληψης των Βασανιστηρίων αναφορικά με την επίσκεψη που διενεργήθηκε στα Αστυνομικά Κρατητήρια Ορόκλινης στις 30 Νοεμβρίου 2017*, ΕΜΠ 2.17, 3 April 2018.

⁷³⁷ Ombudsman, *Report regarding his to the Paphos Police Detention Centre on 1 September 2020*, 24 September 2020, available in Greek at: <https://bit.ly/3dFJ9yz>.

as detainees did not have access to sunlight in Lakatamia police holding cells. Furthermore, they do not have any recreational facilities.⁷³⁸

Regarding the accommodation of dietary requirements for religious or medical reasons, the situation in **holding cells** is similar to that in the Menogia detention centre, but quality and quantity varies from one holding cell to another. Regarding the Police Station in Lakatamia, in 2022, detainees mentioned that they each have a bottle/cup for drinking water. When it ran out, they would have to ask the police officers to refill their bottle/cup. This meant that they either had to shout out to a police officer or ring a buzzer to alert police officers. All detainees mentioned the practice as problematic, while some mentioned that sometimes it took the officers a long time to come and take the bottle/cup or to bring it back filled. However, improvements were made in 2023, in that detainees now have access to a water dispenser all day, as their cells are open almost all day until 10 pm. However, there were times that the water tasted salty, as one detainee mentioned, and thus had to purchase water bottles provided at the police station.

The conditions of PHC were raised again by the CPT in its 2024 report on Cyprus, which stated that “police stations visited designed to detain persons for more than 24 hours offered satisfactory material conditions overall for short stays of a few days, most of the police stations visited were dirty and certain installations such as call bells and artificial lighting were not functioning. Access to natural light also remained a problem in all police stations and detention centres visited, where windows of cells and yards were covered with layers of metal mesh, wooden boards or opaque windows in order to prevent sunlight from directly entering the cells. This prevented detained persons from having access to natural light and rendered the cells very sombre. Access to fresh air remains problematic.”⁷³⁹

In early 2024, the Ombudsman’s Office also carried out an unannounced visit to the Limassol police holding cell, under the National Mechanism for the Prevention of Torture. According to the Report, the holding cells cannot be considered compatible with international standards for the detention of any prisoner. As pointed out in the 17-page report, the detention center remains in a poor state of infrastructure, there is overcrowding, some prisoners share their cell with another person, and there are cases of prisoners sleeping on a mattress on the floor. In the section for immigration detainees, the lighting is insufficient, a fact that is aggravated by the absence of windows in the cells. Furthermore, it is noted that problems in the Limassol detention center were also identified during the visit of the Council of Europe in 2017, which were recorded in a report, however, as it appears, nothing has been done to date.⁷⁴⁰

Based on feedback from detainees in 2024, there do not seem to have been significant improvements to the conditions in PHC that are commonly used for immigration detention such as no access to open-air spaces, no access to washing machines, and no recreational activities.⁷⁴¹

Regarding conditions at the **holding facilities at Larnaca and Paphos International Airports** these are considered substandard with main issues including no access to natural light, fresh air or outdoor exercise area and with rooms locked at all times. Both the CPT and the national Ombudsman consider these facilities to be only acceptable for holding persons for a few hours.⁷⁴²

⁷³⁸ ECtHR, *Haghilo v. Cyprus* (47920/12), 26 March 2019, available at: <https://bit.ly/2Uru0Zh>.

⁷³⁹ CPT, *Report to the Government of Cyprus on the visit to Cyprus carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 9 to 17 May 2023*, available [here](#).

⁷⁴⁰ Ombudsman’s Office, Report dated 9 April 2024, available at: <https://bit.ly/4azrDrM>; Philnews, *The Limassol detention centers are in a bad state - Unannounced visit by Lottides*, 10 April 2024, available in Greek at: <https://bit.ly/3xlZAaY>.

⁷⁴¹ Based on information provided by Cyprus Refugee Council.

⁷⁴² CPT, *Report to the Government of Cyprus on the visit to Cyprus carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 9 to 17 May 2023*, available [here](#).

2.2. Activities

Detainees in **Menogia** have access to a television located in the communal area, and there are magazines and books provided by the Red Cross Cyprus. However, these are very limited in number and are mostly available in English. Detainees have access to computers in the communal areas.⁷⁴³ Detainees have access to internet through their mobile phones.⁷⁴⁴ Access to WiFi is only available in communal spaces and not in the detainees' cells. During access to outdoor spaces, detainees can engage in recreational activities such as basketball, football, card playing, chess, and backgammon. Instructors for drawing, dancing, and a physical trainer carry out activities on a weekly basis, however detainees reported either not knowing of these or showed a lack of motivation or interest to attend.

As part of the Ministry of Education's fund for Adult Education Centres, there are also service providers such as a dance teacher, and an art teacher once per week, and a gym instructor that visits the centre twice a week.⁷⁴⁵

On the two days a week when the gym instructor goes, detainees may spend more time in the courtyard, as that is where the class takes place. However, according to information gathered by the CyRC, not many detainees are interested in attending the gym classes as they take place during the morning when they prefer to sleep almost until noon. According to the staff in Menogia, women detainees are more likely to take the gym classes.⁷⁴⁶

In 2024, the CPT reiterated its recommendation that the Cypriot authorities should further develop the range of, and increase access to, more structured, organised, purposeful activities for persons held at the Menogia Detention Centre. It also recommended that detained persons be restricted in their freedom of movement as little as possible and that they have free access to outdoor exercise throughout the day.⁷⁴⁷

In **holding cells** there are no entertainment facilities, no reading materials, computers, or televisions and in most cases no internet access. Phone allowance and hours spent outside of their cells vary. For example, detainees are only allowed to use their phones when they are taken out of their cells which in certain Police Stations, like in Paphos district, may be 2 times per day, one hour each, whereas in Lakatamia they are allowed to have their phones on them throughout the day until 10 o'clock in the evening when they lock up their cells.

2.3. Health care in detention

According to the Law on Rights of Persons who are Arrested and Detained, a detainee has a right to medical examination, treatment, and monitoring at any time during detention.⁷⁴⁸ The relevant law does not limit this right to emergency situations and, from the testimonies of detainees, they seem to indeed have access to medical examinations, treatment, and monitoring in situations which cannot be classified as emergencies. However, the law provides for the criminal prosecution of a detainee who, if it is proven that the detainee has abused the right to medical examinations, treatment and monitoring, i.e. by requesting it without suffering from a health complication requiring medical examination, treatment or monitoring.⁷⁴⁹ If a detainee is found guilty of this offence, they are liable to three years in prison, or a fine of up to €5,125.80. In practice it does not seem to be used and the CPT has recommended that it be removed from the Law. It has yet to be removed.

⁷⁴³ KISA, *improvements regarding detention conditions – significant problems regarding detention and deportation practices*, 29 January 2017, available at: <http://bit.ly/2jJhL82>.

⁷⁴⁴ Ibid.

⁷⁴⁵ Ibid.

⁷⁴⁶ Information based on monitoring visits carried out by the Cyprus Refugee Council.

⁷⁴⁷ CPT, *Report to the Government of Cyprus on the visit to Cyprus carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 9 to 17 May 2023*, available [here](#).

⁷⁴⁸ Article 23 Rights of Persons who are Arrested and Detained Law.

⁷⁴⁹ Article 30 Rights of Persons who are Arrested and Detained Law.

Upon entry in **Menogia**, detainees undergo medical examinations for specific contagious diseases e.g., tuberculosis, HIV and hepatitis tests, but not a full assessment of physical and mental health issues. In 2023, the CPT expressed concerns about the completeness of the medical files held at the Menogia Detention Centre, which could compromise their reliability. Specifically, the report mentions medical related incidents that have not been included in the medical file; the description of injuries omitting relevant details (such as, its location and dimension); a lack of detail about the origin of the injury by the foreign detainee; or the doctor's opinion about the consistency between the injury and the allegation. Also, from the small sample of files assessed by the delegation's medical doctor it transpired that the medical examination at admission, besides not revealing injuries on covered parts of the body was also insufficiently thorough; in one case, a pre-existing psychiatric illness had not been detected. In addition, the delegation observed that the medical notes were cursory, at times consisting of no more than one single word. An extra complication is that it appears that a detained person may have two distinct medical files and none of the medical information from the first medical file is included into the second file, and no cross reference was made in either file.⁷⁵⁰

The Medical Centre of Menogia is staffed with a General Practitioner on a full-time basis, from Monday to Friday from 07:30am to 15:00pm. In addition, two nurses, a general nurse, and a mental health nurse are present at the Centre 24 hours per day daily, in shifts. A clinical psychologist was appointed by the Department of Mental Health Services, working there once a week during office hours. As of the beginning of 2022 and continuing until today, a group of psychology university students visit the centre every Monday from 09:00am-17:00, providing psychosocial support as part of a Red Cross initiative. In cases of emergencies, or where it is deemed necessary, detainees are transferred to **Larnaca** General Hospital or the old Hospital in Larnaca where psychiatrists and dentists are located. If a detainee is in need of a mental health practitioner, they must be referred to one by the on-site GP. During transportation, detainees are handcuffed, apart from certain cases of persons with disabilities, usually for the entire duration of transportation, and there is no indication that an individual security assessment is carried out on the necessity of this measure. Depending on the examining doctor, they may also be handcuffed during the medical examination, and usually a policeman or policewoman – depending on the gender of the detainee – is present or close by throughout the medical examination.

According to the law, any communication between the detainee and members of staff or police for purposes of medical examinations is deemed an “important” interaction and, therefore, authorities are obliged to ensure communication in a language which the detainee understands.⁷⁵¹ Based on the testimonies of detainees, due to the lack of interpreters available during the medical examination, other detainees are requested to serve as interpreters.⁷⁵² Although detainees seem willing to provide such assistance, in view of the sensitivity of medical information, it cannot be considered to satisfy the requirement of the law.

For a detainee to receive medical care and be examined by a doctor during detention, a written request must be lodged on their behalf. These requests, if submitted in English or Greek, are attended to in a timely manner and with a prompt response, and there were no complaints regarding the time it took for a request to be processed and for the detainee to see a doctor. There is no available information of anyone attempting to submit such a request in another language so as to know if it would be accepted and if there are procedures in place to have it translated. Most detainees who do not write in Greek or English, or who are illiterate, will ask a fellow detainee or an officer to fill this request for them.⁷⁵³

⁷⁵⁰ CPT, *Reports to the Government of Belgium on the visit to Belgium carried out by the European Committee for the Prevention of Torture and Inhuman or Degrating Treatment or Punishment (CPT) from 7 to 10 November 2022*, 13 July 2023, available at: <https://bit.ly/3RwrAom>. See also, ECRE, *Elena Weekly Legal Update (EWLU)* of 8 September 2023, available at: <https://bit.ly/3PFoVsZ>.

⁷⁵¹ Articles 18 and 25 Rights of Persons who are Arrested and Detained Law.

⁷⁵² Information based on monitoring visits carried out by the Cyprus Refugee Council.

⁷⁵³ Ibid.

Regarding access to medical care for detainees including asylum applicants being held in a **holding cell** at police stations, they are taken to public hospitals in a manner similar to that described above. However, the way in which such requests are handled may vary from one holding cell to another.

2.4. Special needs in detention

Families are not detained, and the plan to create a wing in **Menogia** for the purpose of detaining families with children never moved forward and seems to have since been abandoned.⁷⁵⁴ Unaccompanied children are not detained, nor are mothers of young children. Women are always detained separately from men but there are no special provisions for vulnerable persons in detention.

There is no effective mechanism in detention centres (or out of detention centres) to identify and assess persons with special needs. Persons categorised as vulnerable before detention or during their detention will still be detained. There are designated sanitary spaces, i.e., toilets and showers, for persons with disabilities. In Menogia, they are required to have 2 wheelchairs available, however, they do not have cells specifically for people with disabilities. In Lakatamia PHC, on the other hand, there is a cell for detainees with special needs or disabilities. There is no indication of other support provided for vulnerable persons.

3. Access to detention facilities

Indicators: Access to Detention Facilities

1. Is access to detention centres allowed to

❖ Lawyers:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Limited	<input type="checkbox"/> No
❖ NGOs:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Limited	<input type="checkbox"/> No
❖ UNHCR:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Limited	<input type="checkbox"/> No
❖ Family members:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Limited	<input type="checkbox"/> No

Under the law, every detainee is allowed to have personal interviews with a lawyer in a private space without the presence of any member of the police.⁷⁵⁵ This right can be exercised any day or time and the Head of the Detention Centre has an obligation to not prevent, obstruct, or limit access. In practice this is mostly adhered to. However, there would probably be an issue if a lawyer attempted to visit past the hour detainees are restricted to their cells. In the case of UNHCR or NGO visits, there are restrictions as they must give prior notice and will be given access during regular hours. Police officers may be present during interviews with detainees and NGOs, however in 2024 it was noted that if the detainee is an asylum seeker such meetings were held without presence of police officers. Lawyers maintain client/lawyer privilege and can meet in private.⁷⁵⁶

The media is restricted from accessing detention centres and must request permission which would most probably not be granted. As mainstream media show little interest in such issues, there is not a lot of information with regard to media attempts to enter detention facilities. Less mainstream media would definitely not be given access and any video footage that has surfaced was shot without permission. Politicians have access to detention centres but are also required to give prior notice.

Under the law, every detainee has the right to daily visits with any person of their choice for one hour.⁷⁵⁷ These are held in the presence of the police; however, in practice police officers do not remain in the visiting room, rather they leave the door open and monitor occasionally. The same applies to religious representatives.⁷⁵⁸

⁷⁵⁴ Ibid.

⁷⁵⁵ Article 12 Rights of Persons who are Arrested and Detained Law.

⁷⁵⁶ Information provided by Cyprus Refugee Council

⁷⁵⁷ Article 16 Rights of Persons who are Arrested and Detained Law.

⁷⁵⁸ Information provided by Cyprus Refugee Council

NGOs and UNHCR monitor detention centres, but in order to carry out monitoring visits and to be given access to areas besides those for visitors, approval is needed from the Head of Police or the Ministry of Justice and Public Order. Throughout 2016, the Police carried out consultations with NGOs and signed a Memorandum of Understanding in March 2017 which remains in effect (indefinitely), in order to facilitate better collaboration and communication between all parties on, among other things, access to places of detention and exchange of information. This has indeed led to more effective access and faster information exchange.⁷⁵⁹ The Cyprus Refugee Council carries out regular monitoring visits to Menogia, at least once a month, mainly to identify and screen vulnerable persons and provide information on asylum procedures to detainees. The police in Menogia are notified beforehand of the visits.

In **Menogia**, detainees are permitted to have mobile phones and use them at any time. Detainees report that they must pay for credit for their mobile phone with their own money that is held for them in the centre. Money sources include what was in their possession at the time of arrest or from friends or family. This money is used for all their necessities. This creates a communication barrier for detainees who did not carry any money at the moment of their arrest or who have used all of their funds. Detainees report that in such cases, they borrow money from other detainees or use another detainee's mobile. In recent years, access to free WiFi has increased communication via mobile applications, however the quality for voice calls is not always adequate. According to the management of the centre, detainees can request to use the centre's landline, however such a request must be submitted in writing and approved by the Director which usually takes 24 hours, and this includes calls to lawyers. Detainees did not seem to know about this option or reported that it was easier to borrow another detainee's mobile.

As the Centre is in a remote area, it is not easy for lawyers to access it, therefore detainees use mobile applications to send documents or written communication to lawyers, NGOs, or other organisations.⁷⁶⁰

The situation in **holding cells** varies. In some, there are stricter rules regarding the use of a mobile phone, however in others it is easier to access the landline. Regarding visitation, detainees are allowed visitors and lawyers as well as NGOs if they receive approval as mentioned above.

D. Procedural safeguards

1. Judicial review of the detention order

Indicators: Judicial Review of Detention

1. Is there an automatic review of the lawfulness of detention? ☐ Yes ☒ No
2. If yes, at what interval is the detention order reviewed?

Detention based on the Refugee Law or the Aliens and Immigration Law as a "prohibited immigrant" has no time limit or automatic review and can only be challenged judicially. Detention based on the Aliens and Immigration Law, under the articles that transpose the Returns Directive, has a maximum limit of 18 months and provides for periodic reviews of the lawfulness of detention or review of this upon request of the detainees but in practice, this does not take place. Instead, the initial motivation is repeated⁷⁶¹

Regarding access to detention orders, asylum applicants in detention will often not have the detention order on them or the latest detention order in case of renewal. If they request the detention order, which

⁷⁵⁹ Information based on the Cyprus Refugee Council's access to Menogia within the scope of a pilot project on alternatives to detention.

⁷⁶⁰ Information based on monitoring visits carried out by the Cyprus Refugee Council.

⁷⁶¹ Based on information from cases represented by CYRC as well as other cases communicated by lawyers to Cyprus Refugee Council.

may be kept in individual files in the offices of the centre, they will be provided with it, however there are always cases identified, including in 2024, in **Police Holding Cells** (PHC) where the detention order was issued or communicated to detainees with delays reaching 2-3 weeks.⁷⁶² There have also been instances, where NGOs request to review the detention orders of their beneficiaries and the police refuse to provide these to the NGOs or to the detainees themselves.⁷⁶³

Until 2021, all detention orders reviewed included only the wording of the article and, although it was stated that an individual assessment had been carried out, there were no individual facts or reasons for detention or any other reference, justification or findings of an individual assessment. Furthermore, the detention order would refer to “objective criteria” but there was no mention or analysis on what those objective criteria were and how they are applied or justified in the individual case. This raised concerns from the IPAC, and Judges would often comment that the detention orders did not have adequate justification even if detention was not considered illegal and instructed the CRMD to review them.⁷⁶⁴ As a result, since late 2021 detention orders list the reasons for which detention has been ordered (e.g., illegal entry, delay in applying for asylum, convicted for criminal offence, lack of travel document or address). However, there is no mention of the facts of the case or an individual assessment on how these reasons justify detention. The situation in 2022, 2023 and 2024 remained the same.⁷⁶⁵

Detention orders also include a brief description of the right to challenge the order by recourse before the Administrative Court or the IPAC, as well as the right to apply for legal aid but do not mention the right to submit a *Habeas Corpus* application to challenge the duration of detention. Moreover, there is no information on the procedure to be followed to access these remedies, including legal aid. The administrative order is usually issued in English and/or in Greek, and it is never provided in a language the applicant is known to understand.

In **Menogia**, detainees are given a list of lawyers and a general leaflet available in many languages informing them of their rights and obligations in detention but this does not include information on the right to legal challenges and the right to legal aid and how to access this. However, from discussions with detainees it is often evident that they do not have knowledge of the reasons for their detention and/or the legal challenges and legal options available and how to go about these.⁷⁶⁶ In spite of claims by the CRMD that detainees are always provided with written information regarding the grounds of their detention and their rights to challenge the detention orders, and that every reasonable effort is made to ensure that detainees receive the information in a language they understand,⁷⁶⁷ little improvement has been made and the situation, as reflected in older reports, remains.⁷⁶⁸

In late 2019, in an effort to address the issue of lack of information, the Cyprus Refugee Council, within the scope of the ATD project, issued an information leaflet that provided basic information on detention, access to asylum procedures, available remedies to challenge detention and access to legal aid. The leaflet was made available in **Menogia**. It was also disseminated in 2020 and again in 2023.

Regarding access to Court, detainees in **Menogia** usually have access to courts with no delays.

For detainees in **holding cells**, access to court is problematic without a lawyer, including when trying to access legal aid. Contrary to Menogia, there are no clear procedures on how to request access to judicial

⁷⁶² Information based on cases represented by the Cyprus Refugee Council.

⁷⁶³ Information based on cases represented by the Cyprus Refugee Council.

⁷⁶⁴ Information provided from the Cyprus Refugee Council and derived from reviewing IPAC decisions, e.g., *A.H Κυπριακής Δημοκρατίας, μέσω Διευθυντή Τμήματος Αρχείου Πληθυσμού και Μετανάστευσης*, 19 January 2021, available at: <https://bit.ly/3MEIm2E>.

⁷⁶⁵ Information based on monitoring visits carried out by the Cyprus Refugee Council.

⁷⁶⁶ Ibid.

⁷⁶⁷ Ibid.

⁷⁶⁸ Ombudsman, *Report on the visits to Menogia on 14 February, 3 April, and 19 April 2013, 16 May 2013*; KISA, *Comments and Observations for the forthcoming 52nd session of the UN Committee against Torture*, April 2014, 10, available at: <https://bit.ly/4aFS92J>.

procedures and no clear guidelines for the police officers to respond to such requests. The police officers stationed in holding cells are responsible only for guarding detainees whereas access to asylum procedures and access to Court for asylum applicants is the responsibility of the AIU. In the absence of clear procedures, police officers in holding cells often ignore the requests from detainees to access legal remedies or are late in notifying the AIU who will transfer detainees to court. Furthermore, there are also practical difficulties in transferring detainees from the various holding cells spread out across the country to the relevant courts that are only in Nicosia as it is more time consuming and requires more resources in comparison with transferring detainees from Menogia. This leads to practices varying widely between police stations and undue delays in granting access to legal remedies, or to applicants being left with no access to remedies due to deadlines elapsing.

Throughout 2021 and 2022 interventions were made by the Cyprus Refugee Council toward the CRMD, the AIU, the Office of the Ombudsperson and the Asylum Service advocating for clear procedures to be put in place to ensure access to legal remedies. However, no progress was noted and individual cases required repeated interventions to ensure detainees in holding cell were transferred to court. On the contrary, the Cyprus Refugee Council has monitored instances where detainees were taken to Court to apply for legal aid, one day before the deadline of their appeal. The judge would grant the legal aid on the same day and the detainees had to find a lawyer to submit an appeal for them the next day. In another instance, the detainee in a holding cell was not given access to Court and therefore missed his deadline to appeal his detention. He was given access to Court several days after he was transferred to Menogia. There was no progress on the issue in 2023 or 2024 and interventions were often required on individual cases for detainees to access remedies.

In 2024, the ECtHR found Cyprus to have violated Article 5(4) for the detention of a Moroccan asylum applicant.⁷⁶⁹ The case concerned a Moroccan national who entered Cyprus irregularly and subsequently lodged an application for asylum. He was flagged for suspicion of involvement in terrorism-related operations in support of a terrorist group or organisation and was considered to be a danger to public order and national security and was issued a detention order on these grounds. The applicant complained to the ECtHR that his detention violated Article 5(4) of the Convention. The Court noted that there was nothing to suggest that the applicant's lodging of the appeal or subsequent conduct caused delays in its examination and that the inactivity of the proceedings was therefore entirely attributable to the authorities. It reiterated that where an individual's personal liberty is at stake, there are strict standards for the State's compliance with the requirement of a speedy review of the lawfulness of detention. The Court found that as nine months had passed since the day the applicant lodged the appeal until his release with no significant activity in the proceedings, the appeal proceedings were not conducted "speedily" within the meaning of Article 5 (4) and that therefore there had been a violation of this provision.

Regarding legal remedies, according to national legislation, there are two legal remedies available to challenge detention for immigration purposes, whether detained under the Refugee Law or under the Aliens and Immigration Law for immigration/return purposes: a **recourse** before the IPAC or Administrative Court depending on the legal basis of detention and a **Habeas Corpus** application before the Supreme Court.

1.1. Recourse

In recent years, the majority of asylum applicants are detained based on the Refugee Law. In such cases, according to the law, the detention order can be challenged before the IPAC (see section on [Grounds for Detention](#)).⁷⁷⁰ The deadline to submit an appeal was reduced from 75 days to 15 days in 2020.⁷⁷¹ The IPAC is obliged to issue a decision within four weeks and in order to do so may instruct legal representatives to submit oral arguments instead of written arguments as the procedure usually

⁷⁶⁹ K.A. v. Cyprus (Application No. 63076/19), 2 July 2024, available [here](#).

⁷⁷⁰ Article 9ΣΤ(2) & Article 9ΣΤ(6)(α) Refugee Law.

⁷⁷¹ Article 12A(2)(θ) IPAC Law.

requires.⁷⁷² Regarding the length of the examination of cases, these often passed the 4-week time limit and were examined on average within 8 weeks.⁷⁷³ In 2021 and 2022, the duration of examination improved; however, in cases that required interim procedures to the main judicial procedure, either to adduce evidence or modify a legal point, the 4-week time limit was almost always exceeded. Such requests are usually submitted by the lawyer representing the asylum applicant, however, lawyers representing the Attorney General might also make such a request. In such cases, the IPAC asks for consent from both lawyers for the proceedings to go over the 4-week time limit.

If the detention order is based on the Aliens and Immigration Law, the order can be challenged by recourse under Article 146 of the Constitution before the Administrative Court. Although this is not provided for in the Aliens and Immigration Law, it is derived from the wording of Article 146 of the Constitution, as is the case with all executive decisions issued by the administration.⁷⁷⁴ The deadline to submit an appeal is 75 days upon receiving notification of the decision.⁷⁷⁵

Until 2021, the Administrative Court was under no time limit to examine a recourse regarding detention ordered under the Aliens and Immigration Law, even if priority was supposed to be given to detention cases. The decision on whether to expedite judicial examination remained at the Court's discretion, with many cases taking more than 3 months to be examined. With the amendment of the Law, in compliance with the ECtHR decision against Cyprus,⁷⁷⁶ a time limit of 30 days was introduced during which the Administrative Court is obliged to issue a decision, but only for recourses that challenge both return and detention and must include a claim that return would violate the principle of non-refoulement.⁷⁷⁷ The only exception to this is force majeure. In practice there is no clear indication if the time-limit is respected. For other recourses concerning detention the Administrative Court follows a fast-track process, however the duration varies depending on the judge and is on average 6-8 weeks.

It should also be noted that examination of detention based on the *Aliens and Immigration Law* does not examine the substance of the case but only the legality of the decision.

Until 2021, the submission of recourse by a person held under the Aliens and Migration Law would not have suspensive effect on the return/deportation decision, meaning that the detainee could be returned to the country of origin within that time period. With the amendment of the Law, in compliance with the ECtHR decision against Cyprus,⁷⁷⁸ the submission of a recourse against a deportation or return order before the Administrative Court can have suspensive effect if the claimant alleges that the return/deportation decision is in violation of Articles 2 and/or 3 of the European Convention of Human rights or/and is in violation of the principle of non-refoulement.⁷⁷⁹ Nevertheless, the suspensive effect is activated if, and only when the applicant challenges the deportation order. Therefore, applicants remain unprotected for the period of time between the issuing of the decision and the submission of the recourse against the decision. Having in mind the lack of information provided to detainees, the delays in accessing the legal aid procedure, the time it takes for a legal aid procedure to be concluded, there are concerns that the absence of suspensive effect during this time frame, leaves persons with deportation orders against them, unprotected from *refoulement*. Indeed, there has been information and cases of third country nationals being deported before they submit a challenge against their deportation order, including

⁷⁷² Article 9ΣΤ(6)(b)(i) Refugee Law.

⁷⁷³ Based in review of cases on CyLaw database (date the case was registered and the date the decision was issued), available [here](#).

⁷⁷⁴ Article 18ΟΓ& Article 18ΠΣΤ(3) Aliens and Immigration Law.

⁷⁷⁵ Article 146, Cyprus Constitution.

⁷⁷⁶ ECtHR, *M.A. v. Cyprus*, Application No 41872/10, 23 July 2013.

⁷⁷⁷ Article 11A, Administrative Court Law.

⁷⁷⁸ ECtHR, *M.A. v. Cyprus*, Application No 41872/10, 23 July 2013.

⁷⁷⁹ Article 11(A) -(1) Aliens and Immigration Law.

the case of a trans-person who was deported shortly after she was released from the Central Prison, regardless of the fact that she was married to a Cypriot citizen.⁷⁸⁰

In the case of asylum applicants, the deportation order is suspended for the duration of the examination of the first instance administrative examination of the asylum application. For the judicial examination of the asylum application, the deportation order is suspended for asylum applications examined under the regular procedures. However, the deportation order is not suspended for asylum applications examined under the accelerated procedures, as well as for unfounded and inadmissible decisions; subsequent applications; and implicit and explicit withdrawals. A separate application requesting the right to remain must be submitted before the IPAC. If the recourse is successful, the detention order will be annulled.

In early 2021, in *B.F. v. The Republic*,⁷⁸¹ regarding an asylum applicant who had recently entered the country and was detained under the Refugee Law, the IPAC took into account that the applicant had applied for asylum before being notified of any deportation orders against him and therefore the justification that he had applied just to frustrate the return procedures was unfounded. Furthermore, the Court took into consideration that the authorities did not initiate the examination of his asylum application while he was serving a prison sentence for using forged documents, but only 10 months later, while in removal detention. The Court also found that the assessment of whether to detain the applicant was problematic and that disproportionate weight was given to certain facts of the case, therefore the necessity and proportionality element was not satisfied. Finally, the Court found that instead of examining any alternatives to detention, the authorities decided to impose detention as a first instead of a last resort.

In early 2022 however, the Supreme Court rejected an appeal against a negative IPAC decision on detention on the basis of article 9F(2)(d) of the Refugee Law.⁷⁸² In the specific case, the asylum applicant had entered RoC and attempted to travel towards another EU country with fake documents. He was arrested and convicted. After serving his prison sentence, he was subject to deportation as a “prohibited migrant”, and he lodged an application for asylum shortly thereafter. The authorities issued a detention order under article 9F(2)(d) and the IPAC deemed the detention order to be legal because, inter alia, the asylum applicant’s behaviour justified the conclusion that his asylum application was not ‘authentic’ and was lodged with the sole purpose of obstructing his return to DRC. The Supreme Court agreed with the IPAC and found its judgment to be ‘reasonable and desirable’. The Supreme Court did not find that the fact that the applicant’s country was not listed as safe created any presumption of an ‘authentic asylum application’ and considered that the examination of alternative measure to detention conducted by the first-instance court was sufficient and correct.

In 2023, the IPAC ordered the release of asylum applicants who had been detained on grounds of public order due to their alleged involvement in fights that had broken out in Pournara on different incidents. The IPAC considered that the simple and only reference to the applicant’s participation in the fight that took place, without any other evidence and without any reference to their own action was not sufficient. In addition, the Court noted that no criminal proceedings were underway to verify their participation. The Court concluded that since no sufficient evidence is found from which it can be properly demonstrated that the applicant constitutes a real, present and sufficiently serious threat to the fundamental interest of society, their detention is not legal.⁷⁸³

⁷⁸⁰ The third country national was not transferred to the designated Migrant Detention Centre to await her deportation, but was instead transferred to Police Holding Cells. The Office of the Ombudsperson has published a report condemning the government for this action. The report can be found in Greek at: <https://bit.ly/3lnQkTP>.

⁷⁸¹ *B.F. v. The Republic*, DK25/20 (22/2/2021) not available online.

⁷⁸² *Mondeke v. RoC* (*mondeke v. κυπριακής δημοκρατίας μέσω, αν.διευθυντη τμήματος αρχείου πληθυσμού και μεταναστευσης, Έφεση κατά απόφασης διοικητικού δικαστηρίου διεθνούς προστασίας αρ.43/2021*), 20 January 2022, available in Greek at: <https://bit.ly/3ZGUlka>.

⁷⁸³ *H.C.I. v. Ministry of Interior*, DK 7/23, 15 March 2023, available in Greek at <https://tinyurl.com/y9d53672>. ; *A.A.T.S v. Ministry of Interior* DK 27/23, 12 December 2023, available in Greek at: <https://tinyurl.com/5h7kfxw8>.

In 2024, the IPAC issued similar decisions in cases of detained asylum applicants concluding that no sufficient evidence was found from which it can be properly demonstrated that the applicant constitutes a real, present and sufficiently serious threat to the fundamental interest of society.⁷⁸⁴

Regarding decisions issued on detention, in 2022, according to the IPAC, 49 decisions were issued in recourses against detention orders, of which 17 succeeded, 23 were rejected and 9 explicitly withdrawn. In 2023, according to the IPAC, 31 recourses were submitted against detention orders and 32 decisions were issued, of which 12 succeeded, 15 were rejected and 5 explicitly withdrawn.⁷⁸⁵

In 2024, according to the IPAC, 36 recourses were submitted against detention orders and 44 decisions were issued, 10 of which succeeded, 14 were rejected and 10 explicitly withdrawn.⁷⁸⁶

1.2. Habeas Corpus application

The second remedy, which is only available before the Supreme Court, is a *Habeas Corpus* application provided for under Article 155(4) of the Constitution, which challenges the lawfulness of detention, but only on grounds relating to length of detention. This remedy is not mentioned in the Aliens and Immigration Law when detention is ordered as a “prohibited immigrant”, but is derived from the Constitution, whereas there are specific provisions referring to this remedy in the articles transposing the Returns Directive and in the Refugee Law.⁷⁸⁷

A *Habeas Corpus* application can be submitted at any time. When detention is ordered under the Refugee Law, a detained asylum applicant is entitled to submit more than one *Habeas Corpus* application if the detention is prolonged, or relevant circumstances arise, or when new elements arise which may affect the legality of the duration of detention.⁷⁸⁸

In early 2020, the Supreme Court delivered a positive decision on a *Habeas Corpus* application.⁷⁸⁹ The applicant also challenged the legality of the detention order in a separate procedure by way of recourse before the Administrative Court, which was rejected and an appeal against the rejection was currently pending before the Supreme Court. The applicant, an asylum applicant, was detained for over a year because his detention was considered by the CRMD as necessary for the protection of national security. It was the second time that the applicant appealed before the Supreme Court asking for the ordering of a *Habeas Corpus* writ. It was held by the Supreme Court that in assessing the legality of the length of detention and in order to ensure the protection of the applicant’s right to effective judicial protection, the Court must be presented with the necessary evidence so as to perform its judicial duty and be able to issue a justified and informed decision. Since the CRMD had not provided any material evidence with regard to the legality of detention and, furthermore, since it was shown that there were delays (on the Attorney General’s part) in the Court procedures regarding the exclusion of the applicant from the asylum procedure, the Court decided to release the detainee.

In 2023, the Supreme Court again ordered the release of a Syrian asylum applicant who was detained for 1 year for reasons of ‘national security or public order’ based on indications that he was a member of a terrorist organisation. The Court found that no actions had been taken by the authorities to investigate or support these claims and neither were any steps taken to examine his asylum application. The Court found the duration of his detention to be unreasonably prolonged and therefore unlawful and ordered his

⁷⁸⁴ O.A. v. Civil Registry and Migration Department, DK 10/2024, 25/7/2024, available [here](#); A.O.L. v. Civil Registry and Migration Department. DK 22/2024, 17/9/2024, available in Greek [here](#).

⁷⁸⁵ Information provided by IPAC.

⁷⁸⁶ Ibid.

⁷⁸⁷ Article 18ΠΣΤ(5) Aliens and Immigration Law; Article 9ΣΤ(7)(a)(i) Refugee Law.

⁷⁸⁸ Article 9ΣΤ(7)(a)(ii) Refugee Law.

⁷⁸⁹ *Khalid Alaoui Mhammedi v. Chief of Police and Minister of Interior*, 4/2020, 24 February 2020, available in Greek at <https://tinyurl.com/5n8atpfx>

immediate release.⁷⁹⁰ Similar cases have been brought before the Supreme Court in 2024, where the Court found once again that no actions had been taken by the authorities to either investigate or support claims and neither had any steps been taken to examine the detainee's asylum application.⁷⁹¹

In 2024, in a habeas corpus application brought before the Supreme Court challenging the detention of an asylum supplicant detained at Larnaca Airport due to refused entry, the Court found that the detention had been illegal from the moment the asylum application had been submitted, as there was no detention order under the Refugee Law and the applicant was denied their rights as an asylum applicant.⁷⁹²

There are no time limits within which the Supreme Court is obliged to examine an *Habeas Corpus* application, and the examination may take one to three months. For cases which fall under the Refugee Law, the Supreme Court is obliged to issue a decision within three weeks and may give necessary instructions to speed up the process.⁷⁹³ The number of *Habeas Corpus* applications submitted is extremely low, but from those submitted it seems that the Court adheres to the prescribed deadline.⁷⁹⁴

The submission of a *Habeas Corpus* application does not have suspensive effect on the return/deportation decision, meaning the detainee can be returned to the country of origin within this time period. In the case of asylum applicants, however, the deportation order is suspended for the duration of the examination of the first instance administrative examination of the asylum application. For the judicial examination of the asylum application, the deportation order is suspended for asylum applications examined under the regular procedures. The deportation order is not suspended for asylum applications examined under the accelerated procedures, as well as for unfounded and inadmissible decisions; subsequent applications; implicit and explicit withdrawals and a separate application requesting the right to remain must be submitted before the IPAC.

If a *Habeas Corpus* application is successful, the detainee should be immediately released, however in practice at times release may be delayed.⁷⁹⁵

1.3. Effectiveness of legal review

The judicial review of detention is not considered effective due to the lack of automatic suspensive effect as well as the length of time to issue a decision. This was confirmed by the ECtHR in *M.A. v. Cyprus* where the Court held that the applicant did not have an effective remedy with automatic suspensive effect to challenge his deportation.⁷⁹⁶ The applicant was not deported to **Syria** only because of an interim measure issued by the Court under Rule 39 of its Rules of Court. The Court concluded that there was a lack of effective remedy to challenge the lawfulness of detention, as the only recourse in domestic law that would have allowed the applicant to have had the lawfulness of his detention examined would have been one brought under Article 146 of the Constitution. The Court held that the average length of such proceedings, standing at eight months, was undoubtedly too long for the purposes of Article 5(4) ECHR, and rejected the argument of the Government that it was possible for individuals to speed up their actions by reaching an agreement with the Government. The Court ruled Cyprus had violated Article 5(4) ECHR (relating to lawfulness of detention) and that domestic remedies must be "certain", and speediness, as an indispensable aspect of Article 5(4) ECHR, should not depend on the parties reaching an agreement. From 2020 onwards, the Republic was still under review by the Committee of Ministers of the CoE with regard to the general measures required to satisfy compliance with the judgment.⁷⁹⁷ The Court has already

⁷⁹⁰ Supreme Court, Application 101/2023, 15 September 2023, available in Greek at: <https://tinyurl.com/5a73w5fz>

⁷⁹¹ Supreme Court, Application 183/2024, 5 December 2024, available in Greek [here](#).

⁷⁹² Supreme Court, Application AP. 224/2024, 23 January 2025, available in Greek [here](#); See also Philenews, *The foreigner who was confined at Larnaca airport is free – What did the Supreme Court decide?*, 29 janvier 2025, available in Greek [here](#).

⁷⁹³ Article 9ΣΤ(7)(b)(i) Refugee Law.

⁷⁹⁴ Supreme Court, Application 1/2019, 24 January 2019.

⁷⁹⁵ Based on observations by Cyprus Refugee Council.

⁷⁹⁶ ECtHR, *M.A. v. Cyprus*, no. 41872/10, paras 169-170.

⁷⁹⁷ ECtHR, *M.A. v. Cyprus*, Status of execution, available at: <https://bit.ly/3Zx3hZz>.

ruled that Cyprus violated the Convention under Article 5(1) in 2015.⁷⁹⁸ In early 2024, the Committee of Ministers decided to close the supervision of this case and adopted the Final Resolution.⁷⁹⁹

Furthermore, the 2020 amendments significantly reduced the deadline to challenge a detention order under the Refugee Law from 75 days to 15 days, during which time legal aid must be requested and approved. This has rendered access to an effective remedy against detention problematic. Since the amendments, detainees have reported that they have missed the 15-day deadline which raises questions on access to adequate information and facilitation of access to remedies in time. As previously mentioned, for detainees in Police **holding cells**, access to court is particularly problematic, as they experience difficulties in accessing legal aid, and police officers do not receive clear instructions on how to respond to such requests. There is no evidence that any training takes place, for police officers guarding administrative detainees in police holding cells. From 2021 onwards, interventions were made by the Cyprus Refugee Council toward relevant stakeholders such as the CRMD, the Ombudsperson's office, the Police Immigration Unit and the Asylum Service, advocating for clear procedures to be put in place to ensure access to legal remedies however no progress was noted and individual cases required repeated interventions to ensure detainees in holding cell were transferred to court. As the vast majority of asylum applicants are now detained under the Refugee Law, which carries no limitation in duration, the number of cases in need of an effective remedy has also increased.

These issues had already been noted in the latest report on Cyprus from the UN Committee against Torture (CAT) issued in December 2019 in which the Committee expressed its concern regarding the lack of protection against *refoulement* stating that '(...) the Committee remains concerned at reports that individuals are still being returned to countries where they might be subjected to torture. It is also concerned about the effectiveness of the appeals process relating to re-examination of decisions of cessation of subsidiary protection status. The Committee is further concerned that the granting of subsidiary protection is approximately five times more frequent than the recognition of refugee status'.

It was also noted that '[t]he Committee remains concerned, however, about the effectiveness of the two courts to adjudicate challenges to the deportation of asylum applicants and irregular migrants, about the relation of these courts with the Supreme Court with regard to the accessibility of appeals, and about the backlog of asylum claims. It recommended that 'The State party should continue to abide by its commitment to provide for an effective judicial remedy with automatic suspensive effect in the context of the deportation of asylum applicants and irregular migrants'.⁸⁰⁰ No further reports are currently available.

2. Legal assistance for review of detention

Indicators: Legal Assistance for Review of Detention

1. Does the law provide for access to free legal assistance for the review of detention?

❖ Detention under the Refugee Law	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
❖ Detention for the purpose of removal	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
❖ Detention as "prohibited immigrant"	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

2. Do asylum applicants have effective access to free legal assistance in practice?

	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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According to the law, an application for legal aid can be submitted for the judicial review of detention (see [Recourse](#)) before the IPAC only when detention is ordered under the provisions of the Refugee Law.⁸⁰¹

⁷⁹⁸ ECtHR, *HS and Others v Cyprus and KF v Cyprus*.

⁷⁹⁹ CoE Committee of Ministers, *Final Resolution in the case of M.A v. Cyprus*, 12-14 March 2024, available at: <https://bit.ly/3vZzoYZ>.

⁸⁰⁰ CAT, *Concluding Observations on the fifth periodic report of Cyprus*, December 2019, available at: <https://bit.ly/49EGAYh>. See also, Global Detention Project, *Cyprus: Reception Challenges in Europe's New Gateway*, 21 August 2019, available at: <https://bit.ly/2UQ75pw>.

⁸⁰¹ Article 9ΣΤ(2) Refugee Law.

Legal aid is not provided when detention is ordered under the Aliens and Immigration Law. However, an application for legal aid can be submitted for judicial review of deportation/removal/return decision subject to a “means and merits” test.⁸⁰² Since almost always, a person against whom a deportation order is issued, will also have a detention order against them, when appealing a deportation order, the appeal can include the detention order as well.

As mentioned above, for detention orders under the *Refugee Law*, a detainee has a 15-day deadline to challenge detention and legal aid applications must be submitted and examined within this time. If a recourse challenging detention is submitted beyond the 15-day deadline, it will be rejected even if the examination of the legal aid application is pending and the delay is due to the Court’s proceedings. When the deadline to submit a recourse to challenge detention was reduced in 2020 from 75 to 15 days, it was initially noted that many legal aid applications were being examined and decided after the deadline to submit a recourse to challenge detention.⁸⁰³ From 2021 onwards and continuing in 2024, these issues seem to have been resolved, as long as detainees are transferred from detention to court in time by the AIU. Such delays are instead often noted for detainees who are detained in holding cells.

For *Habeas Corpus* applications before the Supreme Court, an application for legal aid can be submitted only if detention has been ordered under the *Refugee Law*,⁸⁰⁴ but not in cases in which detention is ordered under the Aliens and Immigration Law.⁸⁰⁵

Legal aid is not provided to challenge or request a review of detention before the authorities through administrative procedures e.g., request for review, challenge of purpose, length, and lawfulness, regardless on the legal basis.

When detention has been ordered under the *Refugee Law*, applications for legal aid either for the judicial review of detention (see *Recourse*) before the IPAC or the length of detention with a *Habeas Corpus* application are subject only to a “means” test. According to the means test, the detainee applying for legal aid must show that they do not have the means to pay for the services of a lawyer and this will be examined by a Welfare Officer who will submit a report to the Court. In most cases of detention, this limb of the test will be met.

In 2022, according to the IPAC, 18 applications for legal aid to challenge detention were successful. In 2023, 13 applications for legal aid to challenge detention were successful. In 2024, 12 applications for legal aid to challenge detention were successful.⁸⁰⁶

Furthermore, in 2024 an amendment to the Legal Aid Law was passed which includes the following,⁸⁰⁷

- ❖ Legal aid applications will be deemed inadmissible if the appeal is submitted past the appeal deadline.
- ❖ When an applicant is awarded legal aid, they can either choose a lawyer, or have one appointed by the Court. However, a lawyer cannot be re-appointed until all lawyers registered under the “Lawyers’ Registry” have either been chosen to represent or have refused to represent. Therefore, if a lawyer is selected to represent an applicant receiving legal aid, that lawyer cannot be chosen to represent any other legal aid beneficiary, until every other lawyer on the list has been considered.
- ❖ Provisions for drafting the “Lawyers’ Registry” and how lawyers can register to be included in it.

⁸⁰² Article 6Γ(2) Legal Aid Law.

⁸⁰³ Based on cases brought before the Court by the Cyprus Refugee Council. The time required to examine legal aid cases can also be derived from the date of application and date of issuance of legal aid decisions as seen on the database of cases published by the Court available at: <https://bit.ly/3IbnaCX>

⁸⁰⁴ Article 6B(7)(b) Legal Aid Law.

⁸⁰⁵ Article 6B and 6Γ Legal Aid Law.

⁸⁰⁶ Information provided by IPAC

⁸⁰⁷ Legal Aid Law, Amendment 170(I)/2024, available [here](#).

- ❖ The penalties for fraudulent statements to secure legal aid have increased. Upon conviction, penalties have risen from £450 (Cypriot pounds) to €3000 and imprisonment from 6 months to 2 years.
- ❖ Introduction of penalties for lawyers who request and receive any additional amount in relation to the services provided under the framework of legal aid, beyond the remuneration received in accordance with the Legal Aid Law.

Contacting a lawyer in Menogia Detention Center is not a significant issue, and detainees usually receive a list of lawyers and their telephone numbers as compiled by the Cyprus Bar Association and as required by law.⁸⁰⁸ However, detainees rarely use the list, as they usually contact lawyers recommended by other detainees or friends, or lawyers that visit the detention centre to meet another detainee/client. The situation in Police holding cells differs and it is not clear if detainees receive a list of lawyers. Meetings with lawyers in detention are confidential and held in a specialised room which has been designated as the lawyer's room. The lawyer can be escorted by an interpreter. The clients are contacted mainly through their mobile phones.

In 2024, the CPT reported that “[f]rom the interviews held with the delegation at police stations and detention centres, it was apparent that there was a lack of information provided to immigration detainees as most of the persons interviewed by the delegation did not know the status of their immigration procedure. Further, they were not provided with information in a language that they understand on how to contact relevant and competent national, international and non-governmental organisations and bodies for assistance. Benefiting from free legal aid was also an issue for persons detained under immigration legislation; most of the persons with whom the delegation discussed were not legally represented in their immigration procedure and claimed they could not benefit from the free legal aid system. Moreover, unlike criminal suspects held in the same facility, persons detained under immigration legislation were not provided with the list of rights of persons under arrest and detention although they should be entitled, from the very outset of their deprivation of liberty, to be informed, without delay and in a language they understand, of all their rights, their legal situation and the procedure applicable to them, including on how to make a complaint.”⁸⁰⁹

Furthermore, regarding Pournara Centre, the CPT noted in 2024 that it was clear that legal assistance was not available free of charge for indigent foreign national detained persons. Moreover, given the *de facto* nature of the detention of foreign nationals without detention orders, it was impossible *per se* to exercise the right to challenge their detention order.⁸¹⁰

Overall, the main obstacles to accessing legal assistance in detention is the short deadline for challenging a detention order, during which legal aid must be applied for; the lack of resources of the detainee to contract the services of a lawyer; the lack of access to legal aid if detained under provisions of the Aliens and Immigration Law and the lack of information and counselling to access legal aid; the lack of information on immigration status and available remedies. The court fees to submit a judicial review are € 96 if the applicant submits it without a lawyer, whereas if the appeal is submitted by a lawyer the court fees are € 137. The submission of a *Habeas Corpus* application requires €150. NGO lawyers may provide assistance to prepare legal aid applications,⁸¹¹ but they are not permitted to appear before the court.

Asylum applicants in detention reach NGOs providing legal assistance primarily through word of mouth, especially since the information available to asylum applicants is often not available or outdated (see section on [Information for Asylum Applicants and Access to UNHCR and NGOs](#)), or by NGOs carrying

⁸⁰⁸ Article 8(3)(b) Rights of Persons who are Arrested and Detained Law.

⁸⁰⁹ CPT, *Report to the Government of Cyprus on the visit to Cyprus carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 9 to 17 May 2023*, available [here](#).

⁸¹⁰ Ibid.

⁸¹¹ Administrative Court, *Alashkham*, Legal Aid Application 15/2018, 17 July 2018, available in Greek [here](#).

out monitoring visits to the detention centre.⁸¹² If an NGO visiting the detention centre cannot offer legal assistance, it often refers asylum applicants to NGOs that do offer such services. If an asylum applicant was represented prior to their detention, there may be a slightly better chance of challenging the detention. However, similar issues will arise, as an asylum applicant who was represented by a private lawyer prior to detention may not have the funds to continue contracting the lawyer's services.

Besides judicial review of detention, a legal representative can challenge the detention of an asylum applicant or request their release through administrative procedures that do not carry expenses. However, the lack of free legal assistance is again an obstacle for detainees to utilise this option and the success of such interventions is extremely low.⁸¹³

Free legal assistance is extremely limited to asylum applicants in detention, as it is only provided by NGOs with extremely limited capacity, inconsistent and dependent on project funding.

E. Differential treatment of specific nationalities in detention

There is no information that indicates specific nationalities being more susceptible to detention, systematically detained or staying longer in detention whilst holding the status of asylum applicant.⁸¹⁴

⁸¹² Information based on monitoring visits carried out by the Cyprus Refugee Council.

⁸¹³ Information provided by Cyprus Refugee Council

⁸¹⁴ Information based on monitoring visits carried out by the Cyprus Refugee Council.

A. Status and residence

1. Residence permit

Indicators: Residence Permit

1. What is the duration of residence permits granted to beneficiaries of protection?
 - ❖ Refugee status 3 years
 - ❖ Subsidiary protection 1 year, renewable for 2 years

According to the Refugee Law,⁸¹⁵ recognised **refugees** are granted, as soon as possible, a residence permit valid for three years. The permit is renewable for three-year periods only, and there is no possibility for this permit to be issued for longer periods. The law also allows for the residence permit of family members of beneficiaries of refugee status that do not qualify individually as refugees to be valid for less than three years renewable, however in practice this limitation was rarely applied. Residence permits are issued by the Civil Registry and Migration Department (CRMD) and in 2023 there were 2,515 permits of recognised refugees valid until 31 December 2023, concerning 1,654 adults and 861 minors.⁸¹⁶

In 2024, 2,004 residence permits were issued for persons granted refugee status. As of December 2024, 3,678 residence permits for persons granted refugee status were valid.⁸¹⁷

In the case of beneficiaries of **subsidiary protection status** and their family members, the law states that a renewable residence permit valid for one year is issued as soon as possible after international protection has been granted.⁸¹⁸ This permit is renewable for two-year periods for the duration of the status. Again, there is no possibility for such permits to be renewed for longer periods. Residence permits are issued by the Civil Registry and Migration Department (CRMD) and in 2023 there were 10,277 permits of beneficiaries of subsidiary protection status valid until 31 December 2023, concerning 6,448 adults and 3,829 minors.⁸¹⁹

In 2024, 9,281 residence permits were issued for persons granted subsidiary protection status. Furthermore, as of December 2024, 13,220 residence permits for persons granted subsidiary protection status were valid.⁸²⁰

Moreover, according to the Refugee Law, residence permits for both refugees and subsidiary protection beneficiaries provide the right to remain only in the areas under the control of the Republic of Cyprus (RoC), therefore excluding beneficiaries from the right to remain or even visit areas in the north of the island that are not under the control of the RoC.⁸²¹

In practice, long delays are systematically encountered in the issuance and renewal of residence permits for both refugees and beneficiaries of subsidiary protection. During 2022, delays increased due to the CRMD prioritising Temporary protection holders who received their residence permits within 5-7 working days on average.⁸²² In 2022, the CRMD set up an online platform where a BIP, once granted international protection or in the case of renewal, could book an appointment to submit the application in the city in which they are living (if in Nicosia at the CRMD Office, for other cities at the AIU of the that city). Depending

⁸¹⁵ Article 18A Refugee Law.

⁸¹⁶ Information provided by Civil Registry and Migration Department.

⁸¹⁷ Information provided by Migration Department.

⁸¹⁸ Article 19(4) Refugee Law.

⁸¹⁹ Information provided by Civil Registry and Migration Department.

⁸²⁰ Information provided by Migration Department.

⁸²¹ Articles 18A and 19(4) Refugee Law.

⁸²² Based on information from beneficiaries/cases represented by the Cyprus Refugee Council.

on the city, appointments were extremely scarce and it could take up to 6 months to secure one. Furthermore, and based on many complaints, throughout 2022, the scarcity in appointments was mainly due to the online platform being abused by agents who book appointments and would then sell these. In early 2023 the operation of online platform was gradually terminated due to the abuse.⁸²³

Throughout 2023, the procedure and time to submit an application for the issuance or renewal of residence permits differed among cities; in Nicosia an appointment is not required and persons are served on a first-come first served basis⁸²⁴ whereas in other cities an appointment must be made at the Aliens and Immigration Unit of the city by email or telephone. Appointments are usually scheduled within 2-3 months.⁸²⁵ In 2024, the procedure to submit an application remained the same.

In 2023, 4-5 months were required from the submission of the application to issuance of the residence permit. In 2024, the processing time was 3-4 months. During this period, and as a result of advocacy interventions from NGOs and UNHCR, the receipt that is given when the application for the permit is submitted is accepted to access certain rights, such as State assistance via the Guaranteed Minimum Income scheme. However, there are rights that cannot be accessed or are problematic to access such as access to the health system, social schemes for persons with disabilities and delays might arise in opening bank accounts. Access to a bank account also impacts employment as employers request a bank account to transfer salaries and may refuse to hire or proceed to terminate employment. Furthermore, employers are often reluctant to hire or maintain employment of an BIP whose residence permit is not valid in fear that they may be employing someone without legal status. These issues remained throughout 2024.

Regarding family members, up to 2019 the CRMD issued residence permits for family members of recognised refugees and beneficiaries of subsidiary protection that did not exist prior to the entry of the refugee into Cyprus; the permits referred to a 'spouse or child of a refugee'. In 2019, the CRMD ceased this practice with the justification that it did not have a legal basis and was merely a practice. Until 2023 the CRMD had not provided an effective alternative status or residence permit leaving persons who have been living for many years in the country without status, residence permit, access to rights, and in many cases leading to loss of employment and the main income of the family.⁸²⁶ The Commissioner for Children's Rights in 2019 and again in 2020, in response to complaints submitted,⁸²⁷ identified it as a gap in the law that violates the principle of family unity, calling on legislative amendments and for the administration to take steps to identify an interim solution. In 2022, the Ombudsman,⁸²⁸ in a report on the issue, reached the same conclusion calling for legislative amendments. To date no legislative amendments have taken place. In early 2025, the Commissioner for Child's Rights once again called on the responsible ministry which is now the Deputy Ministry for Migration and International Protection to take immediate action to resolve the issue.⁸²⁹

From 2020 onwards and continuing in 2024, the Asylum Service has set up a procedure by which they assess the protection needs of family members. If it is decided that there are protection needs, a decision is issued granting international protection which includes the names of the family members. However, in

⁸²³ Cyprus Mail, *Government admits abuse in migration department*, 19 March 2023, available at: <http://bit.ly/3LRW4Qx>; Politis, *He knew about the agents... at the Migration Department and Nouris turned a blind eye*, 22 March 2023, available in Greek at: <http://bit.ly/3TQG8jf>; Philelefttheros, *Brake on online appointments by the Migration Department - Abuse by agents*, 19 March 2023, available in Greek at: <https://tinyurl.com/3mu9jxd5>.

⁸²⁴ Civil Registry Department, *Appointments*, available [here](#).

⁸²⁵ Cyprus Police, *Appointments*, available at: <https://tinyurl.com/4m6pr8cm>.

⁸²⁶ Information provided by Cyprus Refugee Council.

⁸²⁷ Based on the response to individual complaints submitted by the Cyprus Refugee Council before the Commissioner for the Rights of the Child.

⁸²⁸ Report of the Commissioner for Administration and Protection of Human Rights regarding the Family Unity of beneficiaries of International Protection, *Έκθεση Επιτρόπου Διοικήσεως και Προστασίας Ανθρωπίνων Δικαιωμάτων αναφορικά με την Οικογενειακή Ενότητα δικαιούχων Διεθνούς Προστασίας*, available in Greek at: <https://bit.ly/3nsaoF1>.

⁸²⁹ Information provided by Cyprus Refugee Council.

practice such decisions have been issued mainly for minor children of beneficiaries of protection and not for spouses or adult children, leaving them without status, and access to rights.

In 2023, the CRMD in order to address the issue, initiated a practice by which they grant humanitarian status to the spouse and/or parent of BIP. The “special residence permit” is valid for 12 months, granting the right to remain, access to health under the same conditions as an asylum applicant and access to the labour market but subject to the authorisation of the Labour Department.⁸³⁰ Furthermore, the residence permit will be issued only once and before the expiration of the 12 months, the applicant has to apply for a residence permit for employment reasons, which requires a specific employer to support the application.⁸³¹ Since the introduction of the practice and throughout 2024, very few such decisions have been issued and as a result many spouses/parents of BIP are left undocumented with no access to rights. Furthermore, in 2024, cases of male spouses/parents were recorded that were arrested and placed in detention. In such cases, the spouses were released from detention with the intervention of NGO or a lawyer but even when released they were not provided with a status. In certain cases, the parent in detention was requested to undergo a DNA test, the cost of which they had to cover, to prove that they are the biological parent of the BIP even though they were registered on the birth certificate and there was no evident reason to question this.⁸³²

In 2024, the UN Economic and Social Council recommended that Cyprus reviews the right to family residence permits for the spouses and children of beneficiaries of international protection where the family was formed in Cyprus.⁸³³

2. Civil registration

The procedure for the civil registration of children born in Cyprus is the same for all, regardless of nationality or status.⁸³⁴ In order to register the new-born child in the Birth Registry, an application form must be completed and signed by the doctor who delivered the child. A copy is kept at the hospital/clinic records, another copy is sent to the Competent District Administration Office by the hospital/clinic, and a third copy is given to the child's parents, for them to submit it to the Competent District Administration Office. The registration of the child can take place in any District Administration Office, regardless of the district in which the child was born. If the parents of the child are not married, an affidavit is required by both parents confirming the father of the child.

Birth certificates are issued upon registering the birth at all the District Administration Offices. The fee payable for each certificate is €5, provided that the birth has been registered within the time period determined by the law: 15 days from the birth of the child. If the birth is registered three months after the birth of the child the following is required: the Birth Registration Form; an affidavit in the prescribed form; and a fee of €60 (down from €150 as of 2019).⁸³⁵

A birth certificate is required in order to enjoy various rights, such as access to medical care, registration in school, and access to benefits such as child allowance, single parent allowance, and minimum guaranteed income scheme.

There are no reports of difficulties in regard to civil registration of BIPs.

⁸³⁰ Based on information from the representation of beneficiaries of International Protection by the Cyprus Refugee Council.

⁸³¹ Ibid.

⁸³² Information provided by Cyprus Refugee Council.

⁸³³ UN Committee on Economic, Social and Cultural Rights, *Concluding observations on the seventh periodic report of Cyprus*, 18 October 2024, available [here](#).

⁸³⁴ Article 8 Civil Registry Law.

⁸³⁵ Article 16 Civil Registry Law.

Regarding access to marriage, the Cypriot Constitution safeguards everyone's right to get married. However, only members of the Greek or Turkish communities (and other recognized minorities of Cyprus) can access religious marriages.⁸³⁶ Therefore, beneficiaries of International Protection are only allowed to undergo a civil marriage or, since 2015, a civil union. Civil marriages in Cyprus can only occur between one man and one woman.⁸³⁷ This gender limitation does not exist in the case of civil unions, which have the same effect as civil marriages except in terms of adoption.⁸³⁸ For a civil marriage or a civil union to be legally entered into, both spouses need to have given their full and free consent to this end⁸³⁹ and to have reached the minimum age of 18 years.⁸⁴⁰

The prerequisites for a person to apply for a marriage license by the Migration Department of the Ministry of Interior slightly differ when the applicant is a Cypriot/EU National or a Third-Country National. Firstly, when a Cypriot/EU National applies for a marriage license, the form of identification needed is a passport, an identity card and, where applicable, a registration as an EU Citizen in Cyprus.⁸⁴¹ When a Third-Country National applies for a marriage license, the necessary form of identification is a passport. BIPs are exempted from this requirement, as it suffices that they provide the Migration Department with their residence permits and proof of the fact that they handed over their passports to the Asylum Service when they applied for asylum. Secondly, when a Cypriot national applies for a marriage license, a celibacy certificate from the Ministry of Interior, no less recent than 3 months at the time of the application, is required. For EU nationals, this certificate needs to be issued by their member state. Whereas for Third-Country Nationals, a celibacy certificate from the country of origin no less recent than 3 months is required. This certificate needs to be officially translated into Greek or English and be duly ratified. For BIPs the celibacy certificate can be issued by the authorities of the Republic of Cyprus by way of an affidavit signed before the court, as it has already been accepted that the person would be at risk if they had to contact the authorities of their country.⁸⁴² This exception does not extend to Subsidiary Protection Beneficiaries, who still need to obtain this certificate from their country of origin. In doing so they often face bureaucratic hurdles, communication issues and delays, especially when there is no embassy of their country in Cyprus.

As for marriages performed before Beneficiaries of International Protection arrive in the Republic of Cyprus, only civil marriages are recognized and can be registered.⁸⁴³ If the country where the marriage took place is a party to the Hague Convention, it suffices that the marriage certificate bears an Apostille seal.⁸⁴⁴ If not, the marriage certificate needs to be legalized by the Ministry of Foreign Affairs of the country of issuance or by an embassy of Cyprus in the country.⁸⁴⁵ In both cases, marriage certificates need to be officially translated into Greek or English.

Polygamous marriages are not recognised and, in such cases, the first wife to arrive in Cyprus is considered the spouse. Marriages where one spouse is a minor that took place before entering Cyprus are not challenged in any way and can be recognised as mentioned above.

⁸³⁶ Article 22, Cyprus Constitution.

⁸³⁷ Article 3, Marriage Law of 2003 (104(I)/2003).

⁸³⁸ Article 4, Civil Union Law of 2015 (184(I)/2015).

⁸³⁹ Article 8(1)(β), Marriage Law and Article 6(1)(iii), Civil Union Law.

⁸⁴⁰ Article 17(2)(στ), Marriage Law and Article 5(3)(α), Civil Union Law.

⁸⁴¹ Ministry of Interior, *Σύμβαση Πολιτικής Συμβίωσης – Πολιτικοί Γάμοι*, available [here](#).

⁸⁴² Article 8(2), Marriage Law and Article 6(1)(γ) of Civil Union Law. Both refer to Article 21Γ of Refugee Law which stipulates that when the exercise of any right by a recognized refugee normally requires the assistance of the authorities of a state to which they have no access, the responsible authorities of the Republic of Cyprus will provide this assistance and will issue relevant documents or certificates.

⁸⁴³ Information provided by the Migration Department.

⁸⁴⁴ Ministry of Justice and Public Order, *Apostille*, available [here](#).

⁸⁴⁵ Migration Department, *Επικύρωση Εγγράφων*, available [here](#).

3. Long-term residence

Indicators: Long-Term Residence

1. Number of long-term residence permits issued to beneficiaries in 2024: 0

The criteria for applying for long-term resident status for all eligible persons, including persons under refugee status and subsidiary protection, are the following:⁸⁴⁶

- ❖ Five years residence in the government-controlled areas;
- ❖ Stable and regular resources sufficient to live without recourse to the social assistance system of Cyprus. In assessing the resources, the following factors shall be taken into account:
 - the remuneration from a wage-earning full-time employment;
 - the remuneration from other stable and lawful sources;
 - the cost of living, including the rent that applies in the current market;
 - a contact of employment of at least 18-month duration or of an indefinite duration;
 - the availability of shelter for the person and their dependent family members, which is considered adequate for a corresponding family residing in the same area and meets the general standards of safety and health and generally ensures a dignified living;
 - in case of intention to become self-employed, the financial sustainability of the business or activity, including skills and experience in the related field;
- ❖ Adequate knowledge of the Greek language (at level A2, as prescribed in the Common European Framework of Reference for the Languages of the Council of Europe), and of basic data and information about the contemporary political and social reality of Cyprus. In exceptional cases these requirements may be waived;⁸⁴⁷
- ❖ Adequate health insurance covering the risks that are usually covered in insurance contracts involving Cypriot citizens;⁸⁴⁸
- ❖ The person must not constitute a threat to the public security or public order;
- ❖ Residence in the areas controlled by the Republic has been secured not as a result of fraud or misrepresentations.

Procedure

The application must be supported by the following official documents which prove that the preconditions for the acquisition of the long-term residency status are met. In particular:

- ❖ A valid passport or other travel document which is in force for at least two years and certified copies of the aforementioned that include the pages of arrivals to and departures from the Government controlled areas of the Republic;
- ❖ A valid resident permit with an address in the areas controlled by the Republic;
- ❖ An employment contract;
- ❖ Certificates of academic and professional qualifications, including professional licenses;
- ❖ Tax statements of the previous five years and a certificate of settlement of any pending tax obligation;
- ❖ A statement of social insurance contributions made at the Social Insurance Fund for the last five years where the payment of the social insurance is mandatory;
- ❖ VAT statements of the last five years and a certificate of settlement of pending tax obligations, where the applicant in accordance with the provisions of the Value Added Tax Law, is subject to this tax;
- ❖ Statement of bank deposits;
- ❖ Proof of income derived from sources other than employment;
- ❖ Property Titles or a lease with a description of the shelter and utility bills;

⁸⁴⁶ Article 18Θ Aliens and Immigration Law.

⁸⁴⁷ Article 18Θ(2) Aliens and Immigration Law.

⁸⁴⁸ A valid medical card issued by the Health Ministry can be considered as adequate health insurance.

- ❖ Health insurance contract;
- ❖ Certificate of a criminal record;
- ❖ Language certificate issued by the Education Ministry further to an oral examination meeting the level of language requirement or an equivalent certificate recognised by the Education Ministry. Participation in the test is permitted by application to the Service Examinations of the Ministry of Education and Culture and a fee of €25.

The application is submitted to the CRMD, who transfers it to the Migration Control Committee, which is the authority that examines and issues decisions on the applications.

Due to the low number of applications submitted for the status, it is not clear how long the examination takes or on what basis applications are accepted or rejected. From the limited information available, it seems that the criteria have proven extremely difficult to satisfy by any third-country national, including BIPs, with the exception of third-country nationals that are financially well off. Specifically, the most common obstacles reported are the requirements related to proving stable and regular resources, including an employment contract of at least 18 months duration or of an indefinite duration; the mandatory requirement to show contributions to the Social Insurance Fund for the last five years; tax statements of the previous five years; the language certificate, as in practice no other certificate seems to be accepted and, although the required level A2 is supposed to be basic, two persons who took the examination failed it even though they have passed higher levels of language examination from other acknowledged language institutions.⁸⁴⁹

Due to these obstacles, the status has not attracted many applications and, overall, BIPs do not consider it an option and do not bother to apply. Furthermore, the majority of beneficiaries aim at receiving nationality.

There has been no official information available on the number of BIPs receiving the Long-Term Residence status. However, since it was introduced in 2007 it seems that only one refugee has ever received it. In 2024 it was confirmed that no BIP received the status.⁸⁵⁰

4. Naturalisation

Indicators: Naturalisation	
1. What is the waiting period for obtaining citizenship?	8 years ⁸⁵¹
2. Number of citizenship grants to beneficiaries in 2024:	n/a

Citizenship can only be acquired by decent and not by being born on territory. Citizenship can be applied for and the decision to grant citizenship is issued by the Minister of Interior. In 2023, the Law⁸⁵² was amended and the requirements for applying for naturalisation have been hardened significantly.

Specifically, the requirements for applying for naturalisation under the Civil Registry Law, prior to the amendment were as follows:⁸⁵³

1. Five or seven consecutive years of residence, and uninterrupted stay in Cyprus during the last twelve months (e.g., holiday). The required residence period depends on the status of residency and beneficiaries of international protection fall under the category that requires five years;
2. Three guarantors who are of all Cypriot nationality;
3. A clear criminal record.

⁸⁴⁹ Information provided by Cyprus Refugee Council.

⁸⁵⁰ Information provided by Cyprus Refugee Council.

⁸⁵¹ Citizenship is not obtained but granted at the discretion of the Minister of Interior.

⁸⁵² Civil Registry Law (Amendment) Law of 2023.

⁸⁵³ Table III (Article 111) Civil Registry Law, 2002, available in Greek at: <http://bit.ly/2IN0nAD>.

Currently, the requirements under the amended Law, are as follows:

A person who submits an application for naturalization may be naturalized, provided that they cumulatively meets the following requirements:

1. Legal and continuous residence in the Republic for the period of the immediately preceding twelve (12) months from the date of submission of his naturalization application. Periods of absence from the Republic that do not exceed a total of ninety (90) days within the 12 month period do not interrupt the above-mentioned time period; and
2. Total residence with physical presence of seven years of legal residence in the Republic within the last ten years before the mentioned twelve-month period. The years of stay as a student, applicant for international protection, holder of supplementary or temporary protection are not counted towards this seven years. The only exception is for persons who reside in the Republic for the purpose of highly skilled employment in companies as determined by a Decision of the Council of Ministers, who can apply at 4 or 5 years depending on the applicants academic level of the Greek language. And;
3. The applicant is of good character:

According to the Law, elements that tend to indicate good character include:

- (i) The applicant has not shown by deeds or words any lack of respect for the law or contempt for the Republic;
 - (ii) The applicant has not behaved in a way that constitutes acceptance of the illegal administration of the areas not controlled by the Republic, does not hold any office related to it, nor does it possess, illegally enter, cause damage to or interfere with immovable property located in said areas which belongs to another legal owner;
 - (iii) The applicant has not, during any war waged by the Republic, engaged in any transaction, nor communicated with the enemy, or engaged in the conduct of an operation, or participated in any operation in such a manner as to have assisted the enemy;
 - (iv) The applicant has not been sentenced in the Republic or abroad to imprisonment for a serious criminal offense, which carries a prison sentence of five (5) years or more or for another serious offense or for an offense that is dishonourable or involving moral obscenity;
 - (v) The applicant is not wanted at pan-European level by EUROPOL or internationally by INTERPOL for a serious criminal offence, which constitutes an offense in the Republic and carries a prison sentence of five (5) years or more or for another serious offense or for a dishonourable or moral offense turpitude;
 - (vi) The applicant was not sanctioned and his name is not included in a list of sanctions, in accordance with the provisions of the Implementation of the Provisions of the Resolutions or Decisions of the United Nations Security Council (Sanctions) and the Decisions and Regulations of the Council of Europe Union (Restrictive Measures) Act;
 - (vii) No criminal case is pending against the applicant in the Republic or abroad for an offense punishable by imprisonment of three (3) years or more;
 - (viii) The applicant has not entered through an illegal point of entry or entered or remained in the Republic in violation of any prohibition, condition, restriction or reservation, in accordance with the laws of the Republic in force at the time.
 - (ix) The applicant does not constitute a risk to public order and public security of the Republic:
4. The applicant must have sufficient knowledge of the Greek language at level B1, with the exception of persons who reside in the Republic for the purpose of highly skilled employment.
 5. The applicant must have sufficient knowledge of basic elements of the modern political and social reality of the Republic. The process and method of evaluation of this requirement will be determined by a three-member evaluation committee, which is made up from representatives of the Ministry of the Interior, the Ministry of Education, Sports and Youth and the Ministry of Justice and Public Affairs Order.

6. The applicant must have suitable accommodation and stable and regular financial resources sufficient for the maintenance of I and dependent members of their family and for this purpose the following will be taken into account:
 - (i) income from gainful full-time employment and/or income from other sources of a stable and legal nature;
 - (ii) if the applicant is or has been for a long-term unemployed during his stay in the Republic; and
 - (iii) if, as a result of hardship or difficult financial situation, the applicant has received any financial aid or benefit during their stay in the Republic.
7. The applicant has the intention to
 - (i) reside in the Republic; or
 - (ii) enter or continue to serve in the public service of the Republic.

The requirements included in the amended Law are expected to make it extremely difficult if not impossible for BIPs to satisfy, including BIPs that were born in Cyprus or came to Cyprus at a young age and grew up in Cyprus. Specifically, the required years of residence which has been increased from 5 years to 8 years, whereas the years as an applicant for international protection, holder of subsidiary or temporary protection are not counted will be an obstacle for the majority of BIPs as they are subsidiary protection holders, including Syrian nationals. Furthermore, the majority of BIPs enter in an irregular manner, which is considered as an indication of not 'good character'. Finally, the majority of BIPs will have received at some point financial assistance either as an applicant of international protection or later as a BIP which is considered as an indication that the applicant does not have sufficient financial resources.

The procedure to apply requires a submission fee of € 500 upon submission of the application.

The time required to examine applications has always been lengthy and, in most cases, taken over 3-4 years. The procedure to examine applications requires an oral interview, which includes questions related to the political and social issues of Cyprus. A recommendation is then drafted by the examining officer which is then referred to the Minister of Interior who has the final decision either to reject or grant citizenship. Under the amended Law there is no time limit for the examination of applications, except for those of highly skilled employees which undergo a fast-track procedure of maximum 8 months.

Even prior to the amendment naturalisation for BIPs has always been problematic, as the procedures are extremely slow and lack transparency, and naturalisation of BIPs have never been facilitated in any way other than being able to apply after completing 5 years instead of 7 years of stay as is the case for other TCNs. Furthermore, children are not naturalised when born in the country, under any circumstances, which limits access further. In 2021, 11 BIPs were granted citizenship and in 2022, a slight rise was noted with 27 BIPs granted.⁸⁵⁴ In 2023 and 2024, no information was provided on the number of BIPs granted citizenship, however it is expected to be extremely low.⁸⁵⁵

It was also noted that although the requirements for nationality prior to the amendment do not include financial criteria, an applicant's financial situation is a primary consideration. Also, if the person is a recipient of State benefits, including persons with special needs, disabilities, and survivors of torture and trafficking etc, they will most probably be rejected. In the decision it is cited that they are a 'burden on the state'.⁸⁵⁶ From 2021 onward, including 2024, an increase in the decisions rejecting applications for nationality by BIPs – including persons living in the country for periods of well over 10 years – was noted.⁸⁵⁷ Such cases included young adults that were born or grew up in Cyprus, completed public school, speak fluent Greek and are studying in university; in these cases, the motivation for rejection referred to the fact that their parents had or were receiving State support, even if the applicants involved were not.

⁸⁵⁴ Civil Registry and Migration Department.

⁸⁵⁵ Information provided by Cyprus Refugee Council.

⁸⁵⁶ Ibid.

⁸⁵⁷ Ibid.

Furthermore, single persons were rejected, and the justification mentioned the fact that they had no sufficient ties to the country as they had not formed families. In other cases, the applicant was found to be of non-good character, although they had submitted a clean criminal record as required and the finding of non-good character was based on reports supposedly provided by the Central Intelligence Service but with no evidence to support this and no access to such reports. Some of these cases have been appealed before Court and are currently pending.⁸⁵⁸

According to the Law, in cases of children born in Cyprus where one parent is Cypriot and the other is non-Cypriot, but entered or remained in Cyprus irregularly, the child does not acquire nationality unless the Ministerial Council orders otherwise. Until recently, this was only applied to Cypriot nationals who reside in the areas not under the effective control of the RoC and are married and/or have children with nationals of Türkiye who have settled in Cyprus after the 1974 war, and whose entry and residence in Cyprus is considered to be illegal. However, in recent years this has been applied to children of Cypriot nationals living in the areas under the effective control of the RoC who are married to third country nationals, including asylum applicants or international protection holders who may have entered irregularly when they first arrived or at some point stayed irregularly. The procedure for the examination of applications by the Council of Ministers to enable the registration of such children as Cypriot nationals is very lengthy and decisions often remain pending for years; in recent years close to zero decisions have been issued.⁸⁵⁹ In cases where the third country national, including a BIP cannot pass on their own nationality, the child will be stateless. In 2023, the number of such cases increased significantly, including cases where the children are stateless, whereas no decisions were issued by the Council of Ministers.⁸⁶⁰

In December 2024, the Commissioner for Administration and the Protection of Human Rights issued a Report on the issue of children born in Cyprus with one parent that is Cypriot and the other non-Cypriot, focusing on cases where the non-Cypriot parent is not a national of Türkiye. The Commissioner acknowledged that children who are not able to access Cypriot nationality are likely to have their access to basic rights excluded or restricted and that in many such cases where the non-Cypriot parent is a BIP or asylum seeker, they are not able to access the authorities of their country and proceed with the relevant procedures for acquiring citizenship. The Commissioner recommends that cases should be assessed and completed within a reasonable time. For cases that are not approved, the applicants should be informed promptly and in writing of the reasons why their request cannot be approved.⁸⁶¹ The issuance of an administrative decision would also provide access to a legal remedy before the Administrative Court, under the procedures to challenge administrative decisions.⁸⁶²

In 2024, the UN Economic and Social Council called upon the State to take all steps necessary to review the requirements for obtaining Cypriot nationality for children born in Cyprus, with a view to granting nationality to children who would otherwise be stateless, regardless of the status of their parents in relation to nationality, residence, legal status and marital status, paying particular attention to children born to refugee, asylum-seeking, migrant or stateless parents.⁸⁶³

⁸⁵⁸ Information provided by cases represented by the Cyprus Refugee Council.

⁸⁵⁹ Dialogos, *Children of Turkish Cypriot mixed marriages await recognition – The road is long and arduous*, 30 April 2022, available in Greek at <https://bit.ly/3JFZgMc>.

⁸⁶⁰ Information provided by Cyprus Refugee Council.

⁸⁶¹ Ombudsman, *Report of the Commissioner for Administration and Protection of Human Rights regarding the non-completion of the examination of applications for the acquisition of Cypriot citizenship, by virtue of origin, of minors with a Cypriot citizen parent*, dated 13 December 2024, available in Greek [here](#).

⁸⁶² Article 146 Cyprus Constitution, Law Office of the Republic, available [here](#)

⁸⁶³ UN Committee on Economic, Social and Cultural Rights, *Concluding observations on the seventh periodic report of Cyprus*, October 2024, available [here](#).

5. Cessation and review of protection status

Indicators: Cessation

1. Is a personal interview of the asylum applicant in most cases conducted in practice in the cessation procedure? ☒ Yes ☐ No
2. Does the law provide for an appeal against the first instance decision in the cessation procedure? ☒ Yes ☐ No
3. Do beneficiaries have access to free legal assistance at first instance in practice? ☐ Yes ☒ With difficulty ☐ No

According to the Refugee Law,⁸⁶⁴ **refugee status** ceases to exist if the refugee:

- ❖ Has voluntarily re-availed themselves of the protection of the country of nationality;
- ❖ Having lost their nationality, has voluntarily re-acquired it;
- ❖ Has acquired a new nationality, and enjoys the protection of the country that provided them with the new nationality;
- ❖ Has voluntarily re-established themselves in the country which they left or outside which they remained owing to fear of persecution; or
- ❖ Can no longer continue to refuse the protection of the country of nationality or habitual residence because, the circumstances that led to recognition as a refugee have ceased to exist.

The Asylum Service shall examine whether the change of circumstances is of such a significant and non-temporary nature that the refugee's fear of persecution can no longer be regarded as well-founded. However, cessation shall not apply to a refugee who is able to invoke compelling reasons arising out of previous persecution for refusing to avail themselves of the protection of the country of nationality or former habitual residence.⁸⁶⁵

In the case of beneficiaries of subsidiary protection, the Refugee Law provides that they shall cease to be eligible for subsidiary protection when the circumstances which led to the granting of subsidiary protection status have ceased to exist or they have changed to such a degree that protection is no longer required.⁸⁶⁶ As with refugee status, the Head of Asylum Service shall examine whether the change in circumstances is of such a significant and non-temporary nature that the person eligible for subsidiary protection no longer faces a real risk of serious harm. However, cessation shall not apply to a beneficiary of subsidiary protection who is able to invoke compelling reasons arising out of previous serious harm for refusing to avail themselves of the protection of the country of nationality or former habitual residence.

The same procedure is followed to examine cessation of refugee status and subsidiary protection. Firstly, the examination may commence provided that new elements or findings arise indicating that there are reasons to review the status.⁸⁶⁷ When the Head of the Asylum Service examines the possibility of ceasing the status, they must ensure that the person concerned is informed in writing that the Asylum Service is reconsidering whether the person in question satisfies the conditions required for the status. This is generally done in practice. The person concerned must be given the opportunity to submit, in a personal interview in accordance with the [Regular Procedure](#),⁸⁶⁸ or in a written statement, reasons as to why international protection should not be withdrawn.⁸⁶⁹ It is not clear how or when it is decided to provide an interview or a written statement.⁸⁷⁰

⁸⁶⁴ Article 6 Refugee Law.

⁸⁶⁵ Article 6(1A-bis) Refugee Law.

⁸⁶⁶ Article 19(3) Refugee Law.

⁸⁶⁷ Article 6(1B) Refugee Law.

⁸⁶⁸ Articles 13A and 18(1), (2), (2A), (2B) Refugee Law.

⁸⁶⁹ Article 6(1Γ)(a)-(b) Refugee Law.

⁸⁷⁰ Information provided by Cyprus Refugee Council.

Within the cessation procedure, according to the Law, the Head of the Asylum Service shall obtain precise and up-to-date information from various sources, such as, where appropriate, EUAA and UNHCR, as to the general situation prevailing in the countries of origin of the persons concerned.⁸⁷¹ Furthermore, where information on an individual case is collected for the purposes of reconsidering international protection, it is not obtained from the actor(s) of persecution or serious harm in a manner that would result in such actor(s) being directly informed of the fact that the person concerned is a BIP whose status is under reconsideration, or jeopardise the physical integrity of the person or their dependants, or the liberty and security of their family members still living in the country of origin.

If the Head of the Asylum Service, after examining the case in accordance with the [Regular Procedure](#),⁸⁷² considers that one of the cessation grounds is substantiated, a decision is issued in writing and the person concerned is notified.⁸⁷³ The decision must include the facts and legal grounds on which it is based and information on the right to appeal the decision before the IPAC as well as the nature and form of the remedy and the deadline to submit the appeal.⁸⁷⁴

With cessation, any residence permit granted to the person as a refugee or beneficiary of subsidiary protection is cancelled and that person must surrender the identity card and travel documents.⁸⁷⁵

The procedure for appeals is identical to that in the regular procedure (see [Regular Procedure: Appeal](#)). As in the regular procedure, the person concerned may submit an appeal before the IPAC.⁸⁷⁶ The appeal examines both substance and points of law and the persons concerned has a right to remain.

As in the regular procedure, there is no access to free legal assistance from the State before the Asylum Service during the cessation procedure. However, such cases can be assisted by the free legal assistance provided for by NGOs under project funding, but the capacity of these projects is extremely limited. Legal aid is offered by the State only at the judicial examination of the cessation decision before the IPAC.⁸⁷⁷ The application for legal aid is subject to a “means and merits” test and is extremely difficult to be awarded (see [Regular Procedure: Legal Assistance](#)). As there are very few cessation decisions, there are no statistics or information available on the success rate of appeals or legal aid applications.

There is no systematic review of protection status in Cyprus and currently cessation is not applied to specific groups of BIPs.

⁸⁷¹ Article 6(1Δ) Refugee Law.

⁸⁷² Article 13 Refugee Law.

⁸⁷³ Article 6(2) Refugee Law.

⁸⁷⁴ Article 6(2) Refugee Law.

⁸⁷⁵ Article 6(3) Refugee Law.

⁸⁷⁶ Article 11 IPAC Law.

⁸⁷⁷ Article 6B(3) Legal Aid Law.

6. Withdrawal of protection status

Indicators: Withdrawal

1. Is a personal interview of the asylum applicant in most cases conducted in practice in the withdrawal procedure? ☒ Yes ☐ No
2. Does the law provide for an appeal against the withdrawal decision? ☒ Yes ☐ No
3. Do beneficiaries have access to free legal assistance at first instance in practice?
☐ Yes ☒ With difficulty ☐ No

According to the Refugee Law, the Head of the Asylum Service withdraws refugee status if it is found that:⁸⁷⁸

- ❖ The misrepresentation or omission of facts, including the use of false documents, on behalf of the person, was decisive for the granting of refugee status;
- ❖ The person should have been or is excluded from being a refugee in accordance with the exclusion clause under Article 5 of the Refugee Law;
- ❖ There are reasonable grounds for regarding the person as a danger to the security of the Republic; or
- ❖ The person concerned constitutes a danger to the Cypriot community, having been convicted by a final judgment of a particularly serious crime.

Regarding beneficiaries of **subsidiary protection**, the status is withdrawn if the Head of the Asylum Service finds in retrospect, based on events that are revealed and after the status has been granted, that the misrepresentation or omission of facts, including the use of false documents on behalf of the person, was decisive for the granting of subsidiary protection status.⁸⁷⁹

The same procedure as that for **Cessation** is followed.

In 2022, refugee status was withdrawn in 2 cases, concerning 5 persons and subsidiary protection was withdrawn in 15 cases, concerning 28 persons. In 2023, refugee status was withdrawn in 6 cases, concerning 8 persons and subsidiary protection was withdrawn in 15 cases, concerning 20 persons. In 2024, refugee status was withdrawn in 15 cases, concerning 25 persons and subsidiary protection was withdrawn in 151 cases, concerning 313 persons.⁸⁸⁰

There are no statistics or information available on the success rate of appeals or legal aid applications against withdrawal decisions.

⁸⁷⁸ Article 6A Refugee Law.

⁸⁷⁹ Article 19(3A) Refugee Law.

⁸⁸⁰ Based on statistics issued by the Cyprus Asylum Service.

B. Family reunification

1. Criteria and conditions

Indicators: Family Reunification

1. Is there a waiting period before a beneficiary can apply for family reunification?
☐ Yes ☒ No
❖ If yes, what is the waiting period?
2. Does the law set a maximum time limit for submitting a family reunification application?
☒ Yes, to be exempt from material conditions ☐ No
❖ If yes, what is the time limit? 3 months
3. Does the law set a minimum income requirement? ☐ Yes ☒ No

The Refugee Law provides the right to family reunification only to refugees.⁸⁸¹ According to the Law only the following family members have the right to family reunification and only where the family relationship arose before the refugee's entry in RoC,

- ❖ Spouses, provided that both have reached the age of twenty-one. In cases of polygamous marriage, the spouse of a refugee is excluded from the right to family reunification, when another spouse is already cohabiting with the refugee in the Republic;
- ❖ minor and unmarried children of the refugee and their spouse, including a child adopted in accordance with either a decision taken by a competent authority in the Republic or a foreign decision which is automatically enforceable by virtue of the international obligations of the Republic or compulsorily recognised in accordance with the international obligations of the Republic. In cases of polygamous marriage, the child of the refugee and a spouse, besides the spouse already living with the refugee in the Republic, is excluded from the right to family reunification.
- ❖ minor and unmarried child of the refugee, including a child adopted where the refugee has sole custody and responsibility for maintenance. In cases of polygamous marriage, the child of the refugee and a spouse, besides the spouse already living with the refugee in the Republic, is excluded from the right to family reunification.
- ❖ a minor and unmarried child of the refugee's spouse, including a child adopted in case the spouse has sole custody and responsibility for maintenance. In cases of polygamous marriage, the child of a spouse other than the one already cohabiting with the refugee in the Republic is excluded from the right to family reunification.
- ❖ by blood and first-degree relatives, in case the refugee is an unaccompanied minor.

The right to family reunification was removed for beneficiaries of subsidiary protection in 2014 and, only in extremely rare and exceptional cases (approximately two to three cases), has such a request been granted on humanitarian grounds.⁸⁸² Since 2019, no such cases have been identified. In April 2019, the Commissioner for the Rights of the Child concluded that the legislation in Cyprus which imposes a total ban on the right of family reunification to holders of subsidiary protection does not comply with the spirit of Directive 2003/86/EC on family reunification as interpreted by the Commission and is incompatible with the obligations under the ECHR, in particular Articles 8 and 14, as well as the United Nations Convention on the Rights of the Child. They recommended an amendment to the Law, however, there have been no

⁸⁸¹ Article 25(5)-(19) Refugee Law.

⁸⁸² IOM, *IOM Helps Syrian Girl Reunite with Family in Cyprus*, 23 February 2016, available at: <http://bit.ly/2IHbEQ8>.

such developments.⁸⁸³ In 2024, the UN Economic and Social Council recommended that Cyprus reviews the right to family reunification for beneficiaries of subsidiary protection.⁸⁸⁴

There is no waiting period for refugees to apply for family reunification and, according to the law, an application must be submitted to the CRMD, in a form and with a fee as decided by the Director of the CRMD.⁸⁸⁵ If the request is submitted within three months from the granting of refugee status, there are no requirements besides proving the family relations. To date a fee has not been required.

The law provides that the request is accompanied by documentary evidence of the family relationship and accurate copies of the travel documents of the members of the family. If necessary, to prove the existence of the family relationship, the CRMD may conduct personal interviews with the refugee and/or family members and conduct any other investigation deemed necessary. Where a refugee cannot provide official documentary evidence of the family relationship, the CRMD examines other evidence of the existence of such relationship, assessed under Cypriot law. A decision refusing a request cannot be based solely on the absence of such documents. In practice the examination is based on documents submitted combined with the information provided by the refugee during the refugee status determination procedure as well as any other information the CRMD may request. There have been no cases identified where an interview has taken place with the family members.

According to the Law, the request for family reunification is submitted and examined only when the family members of a refugee are living outside the territory of the Republic. As soon as possible, and in any event no later than nine months from the date of the request, the Director of the CRMD shall decide on the request and notifies, in writing, the refugee who made the request as well as the Asylum Service. In exceptional circumstances linked to the complexity of the examination of the request, this period may be extended by written decision of the Director. The decision to reject the request must include the reasons. In the aforementioned procedure, the best interests of the child must be taken into consideration.⁸⁸⁶

Furthermore, in accordance with the Law, where family reunification is possible in a third country with which the refugee and family member(s) have a special connection or when the request for family reunification is submitted later than three months after the refugee was granted refugee status, the Director of the CRMD may also require the following evidence to be submitted:

- ❖ accommodation that is regarded as normal for a comparable family in the same region and which meets the general health and safety standards in force in Cypriot law;
- ❖ health insurance for the refugee and members of his family which covers all risks normally covered for nationals; and
- ❖ stable and regular resources which are sufficient to maintain the refugee and family members without recourse to the social assistance system of the Republic. The Director evaluates the listed resources as to their nature and regularity, and may take into account the level of minimum wages and pensions in the Republic, as well as the number of family members.⁸⁸⁷ The Director may reject a family reunification request concerning a member of a refugee's family, for reasons of public policy, public security or public health.⁸⁸⁸

In practice, the procedure and requirements have often changed and at times there have been various obstacles such as long delays, requests to provide original documents without alternative options,

⁸⁸³ Position of the Commissioner for the Rights of the Child in reference to the right to family reunification for persons with subsidiary protection, April 2019, available in Greek at: <https://bit.ly/3apHev6>.

⁸⁸⁴ UN Committee on Economic, Social and Cultural Rights, Concluding observations on the seventh periodic report of Cyprus, October 2024, available [here](#).

⁸⁸⁵ Article 25(6) Refugee Law.

⁸⁸⁶ Article 25(7)-(11) Refugee Law.

⁸⁸⁷ Article 25(12) Refugee Law.

⁸⁸⁸ Article 25(13) Refugee Law.

requests to provide evidence that applicants have stable and regular resources even when the applicant is exempted from such requirement.⁸⁸⁹

Such practices led to complaints being submitted by the Cyprus Refugee Council before the Commissioner of Administration and Human Rights, the Commissioner for the Rights of the Child and the EU Commission. Both the national Commissioners at the time found the CRMD to be in violation of the law. In 2020, the EU Commission requested information from the CRMD on the procedures and cases. However, throughout 2020, cases were not being decided on and the examination of cases has once again become very slow with cases pending up to three years.

In 2021 and although the EU Commission's inquiry was still ongoing, limited progress was noted. Only 2 family reunification applications received decisions, although both were positive. Furthermore, procedures remained lengthy, with cases taking on average 2 or more years before receiving a decision. In 2022, attempts were made by the CRMD to clear the backlog of pending requests for family reunification as well as speed up the examination of new applications. However, at the end of 2022 and continuing in 2023 and 2024 the procedure remains slow, exceeding 9 months and with minimal decisions issued.⁸⁹⁰

According to the Law, once the Director approves a family reunification request, they immediately authorise entry for members of the refugee's family into the areas under the control of the Republic and notify the relevant consular authorities of the Republic so they may facilitate any necessary visas.⁸⁹¹ However, there have been cases where a positive decision has been issued by the CRMD but the Ministry of Foreign Affairs via the consular authorities have refused to facilitate the issuance of visas.⁸⁹²

In 2022 the IPAC issued a positive decision with regards to family reunification in a case of a recognised refugee who had applied for family reunification with their spouse and 4 underage children.⁸⁹³ As the applicant had applied 3 months after status was granted their application was subject to material conditions. The application was rejected on the basis of financial criteria, although the applicant was employed it was deemed that the income was insufficient to support the family. The IPAC annulled the decision on the basis of a non-sufficient research of the material facts by the CRMD and provided clear guidance on the examination of family reunification applications of refugees, emphasising the need for the CRMD to take into consideration the special circumstances of refugees and the best interest of the child principle. The case has been returned to the CRMD for examination, and a positive decision was issued allowing the family to join the BIP.

Overall, the number of family reunification requests submitted or approved is substantially low due to the low numbers of persons granted refugee status, as the majority of refugees from Syria (96%) receive subsidiary protection and as mentioned above do not have access to this right regardless of the number of years they are in Cyprus.

In 2022, 20 applications for family reunification were submitted, 2 applications were approved, and the rest remain pending. In 2023, 10 applications for family reunification were submitted, 2 were approved and the rest remain pending. In 2024, 30 applications for family reunification were submitted, 1 was approved and the rest remain pending⁸⁹⁴

⁸⁸⁹ Based on information from cases represented by the Cyprus Refugee Council.

⁸⁹⁰ Information provided by the Cyprus Refugee Council

⁸⁹¹ Article 25(14)(a) Refugee Law.

⁸⁹² Information provided by the Cyprus Refugee Council

⁸⁹³ YT v. RoC via CRMD, ΔΔΠ 500/2019, decision date 10/11/2022

⁸⁹⁴ Information provided by the Migration Department I.

2. Status and rights of family members

Although the law allows family members to be granted lesser rights than the sponsor,⁸⁹⁵ in practice this was rarely, if ever, applied, which may be due to the extremely low number of family reunification requests. Family members were issued the same residence permit as the sponsor, which establishes their status as refugees, so that they enjoy the same rights. In 2019, the CRMD ceased issuing residence permits for family members, including family members that arrived via family reunification procedures. In 2022, the CRMD resumed issuing residence permits for family members that arrived under the family reunification procedure, the status is not the same as the sponsor but is referred to as 'refugee/SP spouse' or 'refugee/SP child'. Family members under this status enjoy the same rights as the sponsor with the exception of a travel document. Furthermore, according to a practice implemented in 2022, family members may request examination of their protection needs by the Asylum Service and in two cases it was reported that the Asylum Service proceeded to issue a decision acknowledging that they have the same protection needs as the sponsor and therefore granting them status and rights. However, it is not clear if all cases receive information and access to this procedure.

Overall, due to the limited number of decisions on family reunification cases it is difficult to observe the policy/practice followed in relation to the status and rights afforded to family members.

C. Movement and mobility

1. Freedom of movement

According to the Refugee Law, residence permits for both refugees and subsidiary protection beneficiaries provide the right to remain only in the areas under the control of the Republic of Cyprus, therefore excluding beneficiaries from the right to remain or even visit areas in the north of the island that are not under the control of the RoC.⁸⁹⁶ Other third-country nationals who are resident in Cyprus either as visitors or under some form of residence, employment, or student permit have the right to visit the areas in the north.

The law also permits dispersal schemes, but these have never been implemented.⁸⁹⁷

2. Travel documents

Convention Travel Documents are issued to persons granted **refugee status** with a three-year validity.⁸⁹⁸ The only limitation to the areas of travel is the country of origin of the refugee. Up to 2020, the Convention Travel Documents issued did not meet the requirements of the International Civil Aviation Organisation and, although it was not in most cases an obstacle for refugees to travel to the Schengen Area, which is the most common destination, there were often complaints of being stopped by various airport immigration authorities, at times for hours, due to the travel document. From 2020 onwards, new travel documents are issued which comply with the requirements.

In 2024, 657 travel documents were issued for persons with refugee status.⁸⁹⁹

Up to 2020, beneficiaries of **subsidiary protection** were issued with a one-page travel document valid for a one-journey trip (*laissez passer*), which were very problematic as the vast majority of countries did not accept these, including the Schengen Area. In mid-2020, the CRMD announced the issuance of the

⁸⁹⁵ Article 25(14) Refugee Law.

⁸⁹⁶ Article 18A and 19(4) Refugee Law.

⁸⁹⁷ Article 21(1Γ) Refugee Law.

⁸⁹⁸ Article 22 Refugee Law.

⁸⁹⁹ Information provided by Migration Department

travel documents which led to high demand by Syrian nationals' holders of subsidiary protection as they had been waiting for many years in order to visit relatives mainly in the EU. Due to an influx of requests, the Department announced that travel documents would only be issued for subsidiary protection holders who do not have access to a national passport and a preliminary examination would be carried out to examine this prior to issuing travel documents.

Throughout 2022, 2023 and continuing in 2024, the issue remains problematic as in most cases the procedure to apply cannot even be accessed as the application will not be received and as a result the CRMD does not issue a negative decision which would require justification. Evidently, to date travel documents are not issued by the CRMD for beneficiaries of subsidiary protection, including cases of a stateless person, with very limited exceptions mostly for cases of persons with serious medical issues which require transfer for medical procedures out of Cyprus with the support of the Ministry of Health.⁹⁰⁰

D. Housing

Indicators: Housing	
1. For how long are beneficiaries entitled to stay in reception centres?	Not regulated
2. Number of beneficiaries staying in reception centres as of 31 December 2024	Approx. 17 ⁹⁰¹

There are no schemes providing housing to BIPs. Therefore, those persons need to secure private accommodation on their own. This is often a difficult task, due to language barriers and financial constraints, related to high levels of unemployment, high rent prices, reluctance of landlords to rent premises to non-EU citizens and the extent of assorted allowances. In 2024, as was the case in 2023, securing private accommodation remained difficult for refugees who have recently been granted protection, as well as refugees living in the community. Although instances of homelessness are much more frequent among asylum applicants, BIPs also face this risk and assistance and guidance are required in order to secure shelter. The risk is higher for BIPs that lack community support in the country and vulnerable persons.

BIPs have a right to apply for financial aid through the national Guaranteed Minimum Income (GMI) scheme, which may include a rent allowance. However, in order to apply for the rent allowance a property must already have been contracted. In addition, rent deposits are not covered through the GMI scheme. (see section: [Social Welfare](#)).

Regarding BIPs residing in the Reception Centre, there is no set time frame in which they must leave the Centre once they have received international protection, but persons are informed and urged by the Asylum Service to expedite their transition to the community. People are rarely evicted from the centre and in the case of BIPs efforts are made to support them to exit. However, to date there is still no official procedure for transition into the community. Obstacles faced by BIPs trying to exit Kofinou include finding accommodation in the community, especially in view of the high rent prices and delays with the issuance of residence permits. During 2024, delays related to Guaranteed Minimum Income (GMI); and delays to open a bank account, although still observed, were reduced.

As a significant number of persons will not be able to secure employment immediately after receiving international protection, they will need to apply for financial aid through the national GMI scheme. Prioritization of GMI applications for beneficiaries who are still residing in the Reception Centre has not been officially set-up. Furthermore, the GMI scheme does not provide amounts for housing, unless a specific property has already been identified and contracted.

⁹⁰⁰ Information provided by Cyprus Refugee Council.
⁹⁰¹ Information provided by the Asylum Service.

During 2024, the stay of BIPs was significantly reduced due to efforts conducted by center staff providing integration services to the residents, primarily through job and housing placements.

In 2024, the UN Economic and Social Council raised concerns about reports of a deficit of affordable homes and that migrants and refugees face a heightened risk of exploitative practices by landlords and homelessness. The Committee recommended that the State party take immediate measures to address the housing situation, including by prioritizing funding for the construction of new and affordable housing units, strengthen oversight and enforcement mechanisms to prevent exploitation by landlords and reduce the risk of homelessness, including for migrants and refugees.⁹⁰²

E. Employment and education

1. Access to the labour market

BIPs are granted full access to the labour market under the same conditions that apply in the profession and public administration for nationals, immediately upon receiving international protection.⁹⁰³ Recognised refugees and subsidiary protection holders have access to the labour market under the same conditions.

BIPs have the right to register at the Public Employment Service (PES) offices for purposes of seeking employment.

In September 2021, the PES initiated a different registration and job-seeking procedure for all service-users, including International Protection Holders. Under this new process, all job-applicants are required to register as unemployed, renew their registration and contact employers, through the Labour Department's online platform. While online, the system is not automated and caused many issues (see [Access to the labour market](#) of asylum applicants).

Since late 2019, the CRMD refuses to issue residence permits for family members, leaving them without status and full access to rights and has led to persons losing their employment and other rights. In 2023, the CRMD initiated a practice by which they grant humanitarian status to the spouse and/or parent of BIP, according to which the "special residence permit" is valid for 12 months, granting the right to remain, access to health under the same conditions as an asylum applicant and access to the labour market subject to the authorisation of the Labour Department, and therefore not under the same conditions as an BIP.⁹⁰⁴ Furthermore, the residence permit will be issued only once and before the expiration of the 12 months, the applicant has to apply for a residence permit for employment reasons, which requires a specific employer to support the application.⁹⁰⁵

BIPs have the right to participate in vocational trainings offered by the competent State institutions. Access to such vocational training is very limited due to language barriers since courses are taught predominately in Greek, and a lack of information and guidance. Most courses aimed at BIP are offered through EU-funded sources and/or civil society initiatives. The majority of training courses are offered mostly through physical presence rather than online. Overall number of vacancies remains particularly low.

No official data is available regarding the participation of BIPs in State-led or other vocational training or the level of unemployment among BIPs.

⁹⁰² UN Committee on Economic, Social and Cultural Rights, *Concluding observations on the seventh periodic report of Cyprus*, October 2024, available [here](#).

⁹⁰³ Article 21A Refugee Law.

⁹⁰⁴ Based on information obtained through representation of beneficiaries of International Protection by the Cyprus Refugee Council.

⁹⁰⁵ Ibid.

Employers are not adequately familiarised with BIPs rights of full access to the labour market, which places an additional obstacle for beneficiaries to find a job. In order to address this gap, the Cyprus Refugee Council in collaboration with the UNHCR Representation in Cyprus has launched an online platform 'HelpRefugeesWork'⁹⁰⁶ that connects employers and training providers with beneficiaries and acts as an advocacy tool to familiarise employers with BIPs' rights of full access to the labour market and engage them to collaborations that promote refugee labour integration. Between 2018 and 2024, more than 1200 International Protection Holders registered in the platform, applied for jobs and received employment-related guidance and support, whereas more than 350 well-known businesses covering a wide spectrum of employment sectors have registered in the platform.⁹⁰⁷

According to the Refugee Law, the State authorities should facilitate for BIPs, who cannot provide substantiated evidence of their qualifications, full access to appropriate programs for the evaluation, validation, and certification of their previous learning.⁹⁰⁸ In practice, accreditation of academic qualifications is possible through the same procedures available to nationals, with no special facilitation. Due to this, the following obstacles and/or limitations often prevent persons from accreditation:

- ❖ Unavailability of original academic titles/document needed to undergo accreditation procedures;
- ❖ The high cost of official translation of titles/documents before submitting them to the appointed authority (KYSATS);
- ❖ A lack of information regarding accreditation procedures;
- ❖ Long waiting times for the process to conclude, especially when KYSATS needs to consult with the corresponding authorities of other countries;
- ❖ Cost and difficulties for acquiring full correspondence of a title with the titles offered by the local public institutions.

The recast Qualification Directive provision foreseeing special measures concerning BIPs' inability to meet the costs related to the recognition procedures has not been included in national legislation.

Access to professional experience certification and recognition procedures is also available for beneficiaries, however under the same conditions applying to nationals.⁹⁰⁹ Therefore, due to the lack of information and the fact that the vast majority of those procedures are carried out in Greek, participation of beneficiaries is extremely limited.

In September 2020, the Department of Transportation issued a Circular/Guidance Note concerning the criteria and the procedures for obtaining or renewing a driving license in Cyprus.⁹¹⁰ The circular established additional requirements for non-Cypriot citizens including BIPs, preventing their access to issuing or renewing driving licenses and as a result to accessing professions that require them. Also, the requirement of holding a valid residence permit excluded BIP who had their residence permit under issuance or renewal, a process which typically requires months of waiting (see section: [Residence Permit](#)). In October 2020, the Department of Transportation issued an updated circular clarifying that, due to a temporary technical problem with the issuance of the residence permits at that time, they would accept a certificate issued by the CRMD instead of the residence permit.⁹¹¹

⁹⁰⁶ HelpRefugeesWork for more information, see [here](#).

⁹⁰⁷ Information provided by Cyprus Refugee Council.

⁹⁰⁸ Article 21(1A) Refugee Law.

⁹⁰⁹ Article 21(1)(b)(iΓ) Refugee Law.

⁹¹⁰ Circular/GuidanceNote αρ.32/2020, *Άδειες οδήγησης – Απαιτήσεις για άδεια παραμονής και τεκμήριο για έξι μήνες παραμονής*, 9 September 2020, available in Greek at: <https://bit.ly/3cPlonf>.

⁹¹¹ Circular/GuidanceNote αρ.32/2020 (Clarification), *Άδειες οδήγησης – Απαιτήσεις για άδεια παραμονής και τεκμήριο για έξι μήνες παραμονής*, 20 Octobre 2020, available in Greek at: <https://bit.ly/3cMo9Xr>.

The requirements are considered to be in violation of the Driving License Law,⁹¹² which transposes the relevant article of the EU Directive on Driving Licences.⁹¹³ Following interventions by NGOs, UNHCR, and employers, the issue was brought for discussion before the Human Rights Committee of the Parliament in February 2021, in view of the discriminatory policy and violation of the Law and EU Directive. During the discussion, the Department of Transportation agreed to review the criteria. In May 2021, a new circular was issued, but it did not address the barriers for BIPs. Regarding the requirement of holding a valid residence permit, the circular announces the termination of CRMD's practice to issue a certificate for those not holding a residence permit, thus maintaining the barriers for those BIPs affected by CRMD's delays in issuing or renewing their residence permit.⁹¹⁴ Throughout 2024, the issue remained unresolved.

2. Access to education

BIPs access the general education system and further training or re-training under the same conditions applying to nationals.⁹¹⁵ Children are granted full access to all levels of the education system.

The right of enrolled students to attend secondary education is not affected even when they reach the age of 18.⁹¹⁶ However, considering that the last three years of secondary education are non-obligatory, almost all new students above 18 years of age wishing to enrol for the first time in secondary education are denied access to free public schools by the Ministry of Education. Cyprus Refugee Council's interventions for specific cases have resulted in enrolment, but the overall situation remains.

The age of students and their previous academic level is taken into consideration when deciding the grade where they will be registered. Classes at public schools are taught in Greek. Should they wish to attend a private school (usually to attend courses in English), it is possible but at their own cost.

In the context of primary education, additional hours of Greek language learning are arranged at schools where the number of non-Greek speaking children is deemed particularly high.

Linguistic and cultural barriers are still significant obstacles for young students, especially those entering secondary education. In order to deal with the language barrier in Gymnasium (middle-school) and Lyceums (high-school), the Ministry of Education has developed transitional classes (i.e., classes of 14 hours of Greek per week as well as selected other subjects), and short classes (i.e., classes where 5 hours of Greek per week are offered) in selected schools.⁹¹⁷

Students in Gymnasium and Lyceum are expected to succeed in the final exams to proceed to the next grade. Students the age of 15 and above may also attend evening Greek classes offered by the Ministry of Education in the community through life-learning schemes (Adult Education Centres and State Institutes of Further Education) or other arrangements (EU-funded or volunteer based).

The special needs of students are usually evaluated and taken into consideration by the Ministry of Education upon registration into schools, and sometimes through the intervention of NGOs. Depending on the nature and the seriousness of the disability, different arrangements are offered. The available schemes by the Ministry of Education for students with special needs are: placement in a regular class

⁹¹² Article 5, Driving License Law, available in Greek at: <https://bit.ly/2PzdcQg>.

⁹¹³ Article 12. EU Directive 2006/126 on Driving Licences (Recast), "For the purpose of this Directive, 'normal residence' means the place where a person usually lives, that is for at least 185 days in each calendar year, because of personal and occupational ties, or, in the case of a person with no occupational ties, because of personal ties which show close links between that person and the place where he is living".

⁹¹⁴ Circular/Guidance Note αρ. 9/2021, *Άδειες οδήγησης – Απαιτήσεις για άδεια παραμονής και αποδεικτικού εξάμηνη διαμονή στη Δημοκρατία*, 12 May 2021, available in Greek at: <https://tinyurl.com/mu4dpnf8>.

⁹¹⁵ Article 21(1)(b)(i) and (iB) Refugee Law.

⁹¹⁶ Article 9H(2) Refugee Law.

⁹¹⁷ Ministry of Education, Youth and Sports, *List of schools that provide Greek lessons as a second language*, 20 June 2023, available at: <https://bit.ly/4d0lCpM>.

and provision of additional aid; placement in a special unit which operates within the regular school; placement in a special school (for more severe cases); and placement in alternatives to school settings.

Assessing the needs of children in an adequate manner is time-consuming. In addition, there is often the need to receive important treatments (physiotherapy, occupational therapy, speech therapy) outside of the school context (in public hospital or privately). There are often delays and/or financial constraints in accessing these services.⁹¹⁸

Children entering UASC shelters in the middle of a school year may not be placed in school, and the same will apply to children who are close to 18. Instead, they may be referred to evening classes which include Greek, English or French language, mathematics, and computer studies at the State Institutes of Further Education. Those Institutes operate under the Ministry of Education, mainly as lifelong learning institutions.

Beneficiaries completing public secondary education have the right to participate in the nationwide entry exams in order to secure placement in State universities, under the same conditions applying to nationals. Those who are able to secure a position in the State universities study free of charge. A very limited number of BIPs is admitted annually under special criteria applied for non-EU students by University of Cyprus. A limited number of scholarships is also offered from time to time by private universities.

An important limitation is that BIPs are not eligible for the student sponsorship scheme provided by the State to nationals and EU citizens who secure placement in an accredited tertiary education institution in Cyprus and abroad. This is particularly relevant to BIPs who, due to language barriers or an inability to secure a position in state universities, study in private universities or colleges in Cyprus and are subjected to the higher fees that apply for non-EU students.

F. Social welfare

BIPs, both recognised refugees and subsidiary protection holders have access to the national social welfare system Guaranteed Minimum Income (GMI) at the same level and under the same conditions that apply to nationals. The only exception is the requirement of having five years of legal and continued residence in Cyprus, from which BIPs are exempted. All applicants of GMI are required to reside in the government-controlled areas of RoC. Other than that, there are no requirements to reside in a specific place or region.

The Deputy Ministry of Welfare, and specifically the Welfare Benefit Administration Service (WBAS), is the authority responsible for the administration of the GMI. In practice applicants for GMI, both nationals and BIPs, face long delays in the examination of their application and throughout 2021, 2022 and 2023 most cases took 12 months or more to receive a decision.

In 2024, the time required to examine a GMI application including the rental allowance was reduced from 12 months to 6-7 months, however the period remained challenging for BIPs. Even in cases of vulnerable persons or homeless persons, it is rare the application is examined faster.⁹¹⁹

During the examination of the GMI application, an emergency allowance is provided which varies from district to district and is extremely low, at about € 100-150 for one person per month and approximately € 150-280 for a family per month. The amount cannot be determined in advance and depends on the amount that is provided to the Welfare Office every month by the Deputy Ministry of Welfare. Furthermore, the examination of the emergency application takes approximately 1-3 weeks and is subject to the approval of the supervisor of the welfare office. The application is valid only for one month and must be

⁹¹⁸ Information provided by Cyprus Refugee Council.

⁹¹⁹ Information provided by Cyprus Refugee Council.

submitted every month, until the decision for the GMI is issued. The delays in the examination of GMI applications have a serious negative impact on living standards and integration efforts and in some instances lead to homelessness.⁹²⁰

In 2024, 161 applications were submitted for GMI by persons with refugee status and 145 applications by persons with subsidiary protection status (each application is submitted by the family head and represents the whole family unit). A total of 31 new applications by persons with refugee and/or subsidiary protection status were approved in 2024. Overall, in 2024, a total of 167 beneficiaries (families) with refugee status and 348 with subsidiary protection status (families) received the GMI benefit.⁹²¹

For BIPs, this period is extremely difficult, as all the benefits received as an asylum applicant are immediately terminated upon issuance of a decision on the asylum application. According to an internal SWS circular, BIPs should continue to receive MRC for two months after the decision granting international protection is issued, but this policy is not widely applied, and it has been observed to take place only in very few vulnerable cases.⁹²²

Since 2020, in order to provide rent allowances, GMI requires a copy of the property title by the owner, rental agreements containing taxation stamps if the amount exceeds €5000, two witnesses signing the agreement as well as providing their ID numbers and an electricity utility bill in the name of the tenant. Transfer of the electricity bill in the tenant's name costs €50 provided that the person's name is included in the catalogues of GMI recipients sent to the Electricity Authority by the GMI Services, otherwise the cost is €300. Due to delays in examining the GMI applications, a BIPs who will be eventually approved will not be included in those catalogues before several months elapse. Therefore, transfer of the account on their name will take place afterwards, which results in additional delays in receiving rent allowances.⁹²³

During 2022, complaints concerning the ability of BIPs to open/maintain an account, and as a result receiving GMI benefits, persisted, although at a lower rate compared to previous years. The main issues identified involve documents required by banks, (utility bills in the name of the applicant, rent contract signed by two Cypriot citizens, police record from country of origin, passport), significant delays in concluding the procedures, discrepancies in bank account opening policy between branches/officers, and the requirement for the applicant to speak good Greek/English.

Additionally, from 2021 onward it was observed that banks limit the number of accounts owned by BIPs to one per person. Although one bank account is sufficient for receiving GMI, it is disruptive for disabled persons because disabled BIPs who are dependent on other persons (typically children but also adults not in a position to act independently) have a separate GMI file and a joint bank account is required, with co-owners being the disabled person and the carer. In those situations, the banks typically ask existing clients to close their personal account before opening a joint one, which is a source of additional delays as it often requires resubmission of documents, and re-examination of the applicant's details.

Regarding the verification of identity and residence for BIPs, the Central Bank of Cyprus and the association of credit institutions adopted the law 64 (I)2017 which transposed Directive 2014/92/EU on the comparability of fees related to payment accounts, payment account switching, and access to payment accounts with basic features (Payments Accounts Directive). In February 2019, the Central Bank released the "Directions/Instructions to Credit Institutions in Accordance with the Article 59(4) of the Prevention and Control Revenues from Illegal Activities for 2007-2018".⁹²⁴ Articles 16 and 17(4) stress

⁹²⁰ Information provided by Cyprus Refugee Council.

⁹²¹ Information provided by Welfare Benefit Administration Service.

⁹²² Based on cases represented by the Cyprus Refugee Council.

⁹²³ Information provided by Cyprus Refugee Council.

⁹²⁴ Directive to Credit Institutions in accordance with no. 59(4) of the Laws of 2007 to 2018 on the Prevention and Combating of Money Laundering from Illegal Activities «Οδηγία προς τα Πιστωτικά Ιδρύματα σύμφωνα με το αρ.59(4) των Περί της Παρεμπόδισης και καταπολέμησης της Νομιμοποίησης Εσόδων από παράνομες δραστηριότητες Νόμων του 2007 Εως 2018», February 2019, available in Greek at: <https://bit.ly/3eVlxXF>.

the right of accessing basic bank accounts without any discrimination against consumers legally reside in the European Union, for reasons such as their nationality or place of residence.

It is also indicated that if a credit institution has valid doubts regarding the originality of the documents, it should not contact any governmental agency or credit institution from the country of origin of the person but an appointed department in Cyprus.

With regard to the verification of the address of an applicant, credit institutions may visit the applicants' residence, or use other documents, such as a recent utility bill,⁹²⁵ documents issued by the State or an affidavit.⁹²⁶

Following interventions by UNHCR and NGOs, as well as meetings between Central Bank, Asylum Service, and SWS, the situation has improved. Despite this, issues remain, mainly concerning the time needed for processing applications for opening an account, the requirement of submitting a criminal record certificate, and the requirement for a valid residence permit. The frequency of the occurrence of those obstacles still depends heavily on the branch or the Bank officer handling the individual claim and calls for more efforts towards a comprehensive and uniform Bank practices. Furthermore, the abovementioned consultations mainly involve four private Banks in Cyprus, which engaged in the dialogue, out of the 29 credit Institutions registered in Cyprus.

G. Health care

In June 2019, a National Health System (GESY) took effect for the first time in Cyprus, introducing major differences in the provision of health care services, mainly introducing the concept of a General Practitioner (GP) as a focal point for referrals to all specialised doctors. A network of private practitioners, pharmacies, and diagnostic centres have been set-up in order for health services to be provided, including a number of private hospitals.

Beneficiaries of International Protection, unlike asylum applicants, have access to the General Health System under the same conditions as nationals do. This entails access to a GP free of charge, whereas access to specialised or supportive medical care (specialised doctors, lab work, physiotherapy,

⁹²⁵ Article 126 Directive to Credit Institutions in accordance with no. 59(4) of the Laws of 2007 to 2018 on the Prevention and Combating of Money Laundering from Illegal Activities Άρθρο 126, «Οδηγία προς τα Πιστωτικά Ιδρύματα σύμφωνα με το αρ.59(4) των Περί της Παρεμπόδισης και καταπολέμησης της Νομιμοποίησης Εσόδων από παράνομες δραστηριότητες Νόμων του 2007 Εως 2018», February 2019, available at: <https://bit.ly/3eVlxXF>: “Πέραν από την εξακρίβωση του ονόματος, εξακριβώνεται και η διεύθυνση μόνιμης κατοικίας του πελάτη με ένα από τους πιο κάτω τρόπους: (i) επίσκεψη στον τόπο κατοικίας (σε μια τέτοια περίπτωση θα πρέπει να ετοιμάζεται και καταχωρείται στο φάκελο του πελάτη σχετικό σημείωμα από το λειτουργό του πιστωτικού ιδρύματος που πραγματοποίησε την επίσκεψη), (ii) η προσκόμιση ενός πρόσφατου (μέχρι 6 μήνες) λογαριασμού Οργανισμού Κοινής Ωφέλειας (π.χ. ηλεκτρικού ρεύματος, νερού), ή έγγραφο ασφάλειας κατοικίας, ή δημοτικών φόρων ή/και κατάστασης τραπεζικού λογαριασμού. Η διαδικασία εξακρίβωσης της ταυτότητας ενός πελάτη ενισχύεται εάν το εν λόγω πρόσωπο έχει συστηθεί από κάποιο αξιόπιστο μέλος του προσωπικού του πιστωτικού ιδρύματος ή από άλλο υφιστάμενο αξιόπιστο πελάτη ή τρίτο πρόσωπο γνωστό σε προσωπικό επίπεδο στη διεύθυνση του πιστωτικού ιδρύματος. Λεπτομέρειες τέτοιων συστάσεων πρέπει να σημειώνονται στον προσωπικό φάκελο του πελάτη.”

⁹²⁶ Article 136 Directive to Credit Institutions in accordance with no. 59(4) of the Laws of 2007 to 2018 on the Prevention and Combating of Money Laundering from Illegal Activities Άρθρο 136, (i) «Οδηγία προς τα Πιστωτικά Ιδρύματα σύμφωνα με το αρ.59(4) των Περί της Παρεμπόδισης και καταπολέμησης της Νομιμοποίησης Εσόδων από παράνομες δραστηριότητες Νόμων του 2007 Εως 2018», Φεβρουάριος 2019. <https://bit.ly/3eVlxXF>: “Με τη διεύθυνση που αναγράφεται σε ένα από τα επίσημα έγγραφα για τα οποία γίνεται αναφορά στην παράγραφο 133 και που μπορεί να αντιπροσωπεύει ακόμα και την προσωρινή διεύθυνση του προσώπου που αιτείται την έναρξη επιχειρηματικής σχέσης (π.χ. ενός κυβερνητικού κέντρου υποδοχής αιτητών πολιτικού ασύλου ή ενός μη-κυβερνητικού οργανισμού που βοηθά το εν λόγω πρόσωπο). (ii) Με ένορκη δήλωση της διεύθυνσής τους καθώς και της υποχρέωσης να ενημερώσουν το πιστωτικό ίδρυμα, το συντομότερο δυνατόν, σε περίπτωση αλλαγής της διεύθυνσής τους.”

psychologists etc.) requires contributions of € 6-10 per visit. Medication may also require small contributions which is usually around € 2-4.

Although the transition to the new health system for BIPs was not smooth due to various coordination challenges between the appointed relevant governmental departments, a lack of translated material in the language of beneficiaries and confusion among medical and hospital staff in regard to refugees' rights to health care, the situation has been normalised. A major obstacle remains for BIPs before they receive their residence permit, which is challenging as such a period often reaches 6 months. During this time, persons cannot access health services through GESY and are supposed to have access as asylum applicants, however they need to provide additional documentation showing that although they are BIPs they do not have access to GESY and in many cases this has led to delays or no access.⁹²⁷

BIPs have access to the schemes of the Department for Social Inclusion of Persons with Disabilities, operating under the Ministry of Labour and Social Insurance, which asylum applicants do not have access to. These schemes include various types of allowances and access to care and technical means. Since May 2018, following a decision of the Council of Ministers, BIPs are granted access to the allowance scheme provided to HIV positive persons.⁹²⁸

BIPs have access to mental health care services via GESY, which includes access to psychiatric and psychological care, with a small fee (€ 6 for psychiatrists and € 10 for psychologists). An ongoing gap is the provision of interpretation which is not available for free for the professionals working for GESY. In 2024, the UN Economic and Social Council raised concerns about reports of inadequate access to mental health care, including for refugees, asylum-seekers and migrants and recommended Cyprus ensures funding to improve mental health care services at both the preventive and the treatment levels, including by providing community-based services and programmes, in particular for refugees, asylum-seekers and migrants.⁹²⁹

⁹²⁷ Politis, *She lost the twins due to paperwork and delay in the... registration*, 21 September 2022, available in Greek at: <https://bit.ly/3ZYxHov>.

⁹²⁸ Council of Ministers, Decision 85.016 of 30 May 2018, available in Greek at: <https://tinyurl.com/7crhaacb>

⁹²⁹ UN Committee on Economic, Social and Cultural Rights, Concluding observations on the seventh periodic report of Cyprus, October 2024, available [here](#).

ANNEX I – Transposition of the CEAS in national legislation

Directives and other CEAS measures transposed into national legislation

Directive	Deadline for transposition	Date of transposition	Official title of corresponding act	Web Link
Directive 2011/95/EU Recast Qualification Directive	21 December 2013	15 April 2014	The Refugees (Amendment) Law of 2014 N. 58(I)/2014 The Refugees (Amendment) (No 2) Law of 2014 N. 59(I)/2014	http://bit.ly/1HwnhwB (GR) http://bit.ly/1LhRNPc (GR)
Directive 2013/32/EU Recast Asylum Procedures Directive	20 July 2015 Article 31(3)-(5) to be transposed by 20 July 2018	14 October 2016	The Refugees (Amendment) Law of 2016 N. 105(I)/2016 The Refugees (Amendment) (No 2) Law of 2016 N. 106(I)/2016	http://bit.ly/2kbxgGD (GR) http://bit.ly/2jmEGCt (GR)
Directive 2013/33/EU Recast Reception Conditions Directive	20 July 2015	14 October 2016	The Refugees (Amendment) Law of 2016 N. 105(I)/2016	http://bit.ly/2kbxgGD (GR)
Regulation (EU) No 604/2013 Dublin III Regulation	Directly applicable 20 July 2013	14 October 2016	The Refugees (Amendment) Law of 2016 N. 105(I)/2016	http://bit.ly/2kbxgGD (GR)