

Member State Reply on the 2024 AIDA country report on Greece

1. Statistics

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

2. Asylum Procedure

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

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Solidarity of the Ministry of Labour and Social Affairs to the Special Secretary for the Protection of Unaccompanied Minors (SSPUAM) to the General Secretariat for Vulnerable Persons and Institutional Protection.		
Under the new law, the provision of guardianship is relegated to a list of legal entities appointed by the Public Prosecutor (<i>i.e.</i> , public entities, NGOs, international organisations) who collaborate with persons acting as guardians.	p. 93	The legal entities must employ the professionals acting as guardians (guardianship mandated persons), not just “collaborate with persons”. Suggestion to substitute “collaborate with” with the word “employ”.
Under the new law, the provision of guardianship is delegated to a list of legal entities appointed by the Public Prosecutor (<i>i.e.</i> , public entities, NGOs, international organisations) who collaborate with persons acting as guardianship-mandated persons (henceforth referred to as “mandated guardians”).	p. 148	See above. Suggestion to amend as following “that employ persons acting [...]”
The total number of mandated guardians for UASC throughout the country on 22 January 2025 stood at 128, significantly below the expected minimum number of 170 (with a project that provisioned a maximum of 180 mandated guardians).	p. 148, Section: Legal Representation of Unaccompanied Children.	Indeed, this number is accurate for that time. Yet it should be noted though that the average number of guardians for 2024 was 127, due to gradual implementation of the guardianship project, which included recruitments in three stages (60 guardians by the end of the first month, 120 by the end of the first trimester, 170 by the end of May 2024). Since May 2024, until August 2025, the average number of guardians is 142 (reaching at a point 168 guardians, in June 2024).
At the time of writing, UAMs’ presence in Safe Areas or Zones inside RICs, both on the mainland and the islands, is much higher than the number of those registered (and thus	p. 149	With regard to this discrepancy, we would like to note that up to now the dashboard of statistics for UAMs (e.g. https://migration.gov.gr/wp-content/uploads/2025/09/SGVP_Statistics-September_GR.pdf) is based on the data retrieved from the accommodation requests submitted before the competent authority, as

recorded in the cited statistics), and exceeds the actual capacity of these arrangements		well as the accommodation arrangements updates. This is the case since 2017 and on.
Consequently, discrepancies have been observed concerning the level of involvement of guardians, lawyers, social workers and educators, some of which have affected UACS' asylum procedure, such as Dublin II procedures and appeals, as lawyers and other professionals now require authorisations from the mandated guardian to support or follow up on a case.	p. 149	It should be noted that in alignment with other EU member states' good practices and to EU legislation, the guardian is responsible for representing the minor in asylum and family reunification procedures. The fact that the role of the guardian of unaccompanied children was introduced in Greek practice after two decades of working together with unaccompanied children can only mean that it will take time for this role to be embedded and embraced.
The National Emergency Response Mechanism (NERM), which in accordance with L. 4939/2022, is part of the General Secretariat for Vulnerable Persons and Institutional Protection, and includes a 24/7 telephone hotline	p. 150	The "15107" Tracing hotline of NERM is available Mo-Fri: 08:00-22:00 and Sat: 11:00-19:00

3. Reception Conditions

Extract from the country report	Page and section	Comments
General Secretariat for Vulnerable Persons and Institutional Protection (GSVP)	p. 151	Correct abbreviation is GSVPIP
There is no capacity to actually screen vulnerabilities or provide them with the health care they need. Unaccompanied and separated children face additional barriers when they reach the CCAC. Until a guardian is	p. 195, section: Conditions on the Eastern Aegean islands	Clothes, shoes and communication are provided by the child protection actor operating in the safe area, complementing any distributions made by RIS. Activities are provided by the staff of the child protection actor as well.

<p>appointed, these children have no one to provide them with clothes, shoes or a cell phone to call home and talk to their family. Unaccompanied children also have to spend about two to three weeks in a fenced area called a 'safe area' until they are transferred to a shelter for unaccompanied children. There is nothing to do in the safe area, no activities, recreational or otherwise. It is a container surrounded by barbed wire.</p>		
<p>The newly established General Secretariat is also competent for the National Referral Mechanism, according to Article 66ΑΓ of L. 4939/2022 added with Article 39 of L. 4960/2022.</p>	<p>p. 210, section: Special reception needs for vulnerable groups</p>	<p>The correct name of the GSVPIP's Mechanism is "National Emergency Response Mechanism", whereas the one included in that sections is something different.</p>
<p>The goals of NERM can be separated into the categories: a) accommodation and relocation management, b) evaluation of hosting facilities, c) social integration support, d) institutional protection</p>	<p>p. 210</p>	<p>Please be aware that these are the goals and mandate of the General Secretariat for Vulnerable Persons and Institutional Protection and not of NERM. The goal of NERM is to identify promptly children in immediate need of protection and shelter, transfer them to appropriate accommodation and provide them with the necessary services.</p>
<p>Based on updates by EKKA, by the year's end, the majority of referrals were for UAMs from Egypt (48%), Somalia (15%), Syria (14%) and Afghanistan (10%).</p>	<p>p. 211</p>	<p>By the end of 2022, EKKA had stopped being involved in any capacity in the generation of statistics. Therefore, the phrase should be corrected to "Based on updates by MoMA, by the year's end, [...]"</p>
<p>In December 2024, the average waiting period for the placement of unaccompanied minors residing in island RICs to suitable accommodation places for UAMs was 8,88 days. Lastly, the average time for the placement of UAM in a shelter was 13.45 days.</p>	<p>p. 211</p>	<p>We recommend deleting these two sentences because the data that we had provided you did not concern only islands (for example even the placement from emergency to long-term is included and even the placement from the streets to emergency is included), and moreover it concerned the time period between the issuance of an accommodation act until the actual placement of a child. Given that currently we don't have the capacity to retrieve the requested</p>

		data (e.g. from the day a child entering the safe area in island CCAC until the moment he/she is placed in an accommodation center), perhaps is better to omit it this information.
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3. Detention of Asylum Seekers

Extract from the country report	Page and section	Comments
A number of 385 unaccompanied children have been detained in PRDCs during 2024, prior to their placement in a shelter for UAMs.	p. 216 Detention of Asylum Seekers	See above comment under statistics: 195 UAMs
In total, 385 unaccompanied children were kept in PRDCs countrywide during 2024. ^[1] [1] Information provided by the Directorate of the Hellenic Police, 18 January 2024.	p. 222	See above comment under statistics: 195 UAMs. The reference includes the date of 18 January 2024, while the number in question should be corresponding to the entire year of 2024.
However, the scope of the JMD 9889/2020 does not apply to age assessments of unaccompanied children under the responsibility of the Hellenic Police, <i>i.e.</i> , minor children arrested by the police. In practice, children under the responsibility of police authorities are as a rule deprived of any age assessment guarantees set out in the Ministerial Decision, and systematically undergo medical examinations consisting of left-hand X-ray, panoramic dental X-ray and dental examination if their age is disputed. In addition to the limited reliability and highly invasive nature of the method used, no remedy exists to	p. 222	The JMD can be applied also for children under the responsibility of the Hellenic Police, as long as their asylum seekers and their have been processed for migration status issues (not penal). RIS is responsible for coordinating the procedure. There is always the right to submit an appeal against the decision of the age assessment.

challenge the outcome of that procedure.		
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4. Content of International Protection

Extract from the country report	Page and section	Comments

5. Additional remarks