

For the AIDA Country Report: Greece – Update on the year 2025, responses were received from the following authorities:

1. General Secretariat for Vulnerable Persons and Institutional Protection
2. General Secretariat for the Reception of Asylum Seekers
3. Central Directorate of Citizenship – General Secretariat for Citizenship

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Reply by the General Secretariat for Vulnerable Persons and Institutional Protection

Respondent authority:

General Secretariat for Vulnerable Persons and Institutional Protection, Ministry of Migration and Asylum

Scope of reply:

Protection of vulnerable persons, especially UAMs.

Extract from the country report	Page and section	Comments
Chapter of report: ASYLUM PROCEDURES		
Since detention (or “protective custody”, as it was called) was officially abolished in Greece in 2020, ²⁷⁸ the prolonged restriction of minors in the “SAFE Zones” of CCACs has been characterised as <i>de facto</i> detention of children also by recent national administrative court decisions. ²⁷⁹ The situation of overcrowding and <i>de facto</i> detention under inadequate living conditions remains the reality for unaccompanied minors in CCACs waiting placement in shelters.	70	Clarification: In December 2020, the practice of protective custody in police facilities, implemented by the police after a Prosecutor’s order, was abolished, regarding strictly unaccompanied minors lacking a safe or known residence. This does not concern any measure taken by administrative authorities during identification and first reception procedures. Moreover, for the purpose of completeness, it should be added that: “During late 2024 and early 2025 Greece was faced with unprecedented arrivals of unaccompanied minors, far exceeding the administrative capacity, as well as the accommodation capacity for minors (at that time 1,930 places in specialized accommodation facilities). As a response, the Ministry of Migration and Asylum officially requested the initiation of relocation of UAMs to other EU Member States, receiving no positive response, came into contact with potential donor countries and eventually secured funding for commencing the operation of three (3) safe zones (designated spaces for UAMs supported by child protection actor/NGO) in Controlled Access Centers for the Temporary Accommodation of Asylum Seekers (mainland) and one (1) in the Reception and Identification Center in Central Macedonia, and gradually organized and completed the full evacuation of the safe zones in the CCACs of the Aegean Islands. Following these measures, the situation in the safe zones of the Aegean Islands drastically changed and normalized.”
A new General Secretariat for Vulnerable Persons and Institutional Protection (GSVIP), falling under the responsibilities of the Deputy Minister of Migration and Asylum, was established by Article 6(1) of Presidential Decree 77/2023 (Government Gazette A' 130/27.06.2023), to which the services of the former Special Secretariat for the Protection of Unaccompanied Minors,	145	We suggest enriching the reference to the General Secretariat for Vulnerable Persons and Institutional Protection, by further elaborating on its mandate and activities during the reference year. “A new General Secretariat for Vulnerable Persons and Institutional Protection (GSVIP), falling under the responsibilities of the Deputy Minister of Migration and Asylum, was established by Article 6(1) of Presidential Decree 77/2023 (Government Gazette A' 130/27.06.2023), to which the services of the former Special Secretariat for the Protection of Unaccompanied Minors, established under Article 39 of Presidential Decree 106/2020, were transferred.

established under Article 39 of Presidential Decree 106/2020, were transferred.		The General Secretariat was established with the aim to develop a comprehensive protection framework for vulnerable third-country nationals and stateless persons in Greece. This mission included the design, coordination, implementation and monitoring of policies, programmes and interventions addressing the needs of vulnerable persons, while ensuring institutional coordination among the competent authorities and stakeholders. During the reference year, the Presidential Decree defining the detailed organisational structure and competencies of the General Secretariat was under preparation. In parallel, the National Strategy for the Protection of Vulnerable Persons was under preparation to be eventually adopted during the first semester of 2026. The Strategy aims to establish a coherent national policy framework for the protection of vulnerable persons and to guide the development of future policies, programmes and interventions. Special focus lies on the prevention and response to trafficking in human beings and the protection of victims, including the capacity building of front-line professionals and the development of practical tools to strengthen victim identification and referral procedures. As of November 2025, the General Secretariat is chairing the Interministerial Working Group (IWG) on counter-trafficking and the protection of victims, that brings together representatives from a broad range of public authorities. The IWG acts as a coordination hub for policy planning and focuses on addressing emerging forms of trafficking, identifying gaps related to victims' protection and the persecution of perpetrators and promoting trauma-informed and victim-centered responses.
Nonetheless, in August 2025, the procedure was reformed once again by the Joint Ministerial Decision 147627/22-8-2025	157	For the sake of completeness, it may be useful to clarify the practical implementation of the age assessment procedure under Joint Ministerial Decision the Joint Ministerial Decision 147627/22-8-2025. Pursuant to Article 4(4) thereof, where one of the three prescribed assessment methods cannot be carried out, this does not prevent the completion of the age assessment procedure. In practice, particularly in Reception and Identification Centres on the islands, access to radiological examinations may not always be immediately available due to operational constraints within the local healthcare system, including the limited availability of specialised equipment and the need to prioritise broader healthcare needs. In such cases, the age assessment procedure is completed on the basis of the macroscopic examination and the psychosocial assessment, in accordance with the applicable legal framework.
The total number of mandated guardians for UASC throughout the country on 22 January 2025 stood at 128, ⁷²⁵ significantly below the expected minimum number of 170 ⁷²⁶ (with a project	164	For reasons of consistency, it may be useful to clarify and apply uniform terminology throughout the report. The terms "Unaccompanied Minor (UAM)" and "Unaccompanied Asylum-Seeking Child (UASC)" do not refer to the same categories of children and should not be used interchangeably. While the term

that provisioned a maximum of 180 mandated guardians). This team is responsible for addressing the needs of the 2,414 UASC registered in Greece as of December 2024. ⁷²⁷ With an average allocation of 15 children per professional, they can potentially cover up to 2,550 children.		"UAM" refers to all unaccompanied minors irrespective of their legal status, the term "UASC" refers specifically to unaccompanied minors who have applied for international protection. The report currently uses these terms interchangeably in several sections. It would therefore be helpful to use the term "UASC" where reference is made specifically to asylum-seeking children and "UAM" where the text concerns the broader category of unaccompanied minors, including within the National Guardianship System and reception arrangements.
At the time of writing, UAMs' presence in Safe Areas...	164	The relevant description in this paragraph seems to reflect on a specific period and for this is reason we recommend specifying the period you are mentioning instead of "at the time of the writing". As mentioned above, following the massive transfer of unaccompanied minors from the islands to appropriate accommodation facilities on the mainland, the situation had completely changed. Consequently, the occupancy levels and length of stay in the Safe Zones were significantly reduced. It may therefore be useful to reflect these subsequent developments in the report to provide a complete picture of the situation during the reference year.
The total number of mandated guardians for UASC throughout the country on 22 January 2025 stood at 128 + As reported, as of January 2025, 120 guardians have been appointed by the Public Prosecutors + As of early 2025, there are only 128 mandated guardians nationwide, falling short of the target of 170 (or up to 180 if needed)— a figure still far below what is required to meet actual needs.	164-165	The information regarding the implementation of the National Guardianship System and the number of mandated guardians is repeated in several parts of this section, often referring to the same data point (i.e. the number of guardians at the beginning of 2025). For the sake of clarity and to avoid repetition, these references could be streamlined and complemented with updated information reflecting the evolution of the system throughout the reference year, including the highest number of active mandated guardians reached during 2025 which was 145.

The establishment of a national guardianship system by Law 4960/2022, launched in January 2024, has been a welcome development, as previous legislation on the matter had never entered into force.	165	We suggest complementing this paragraph with additional factual information regarding the implementation of the National Guardianship System during the reference year 2025: “During 2025, the National Guardianship System continued its gradual consolidation. Since the commencement of its implementation in 2024, more than 7,000 unaccompanied minors have had an appointed guardian, while more than 4,800 children received guardianship services during 2025 alone (compared to more than 4,600 during 2024). The average duration of guardianship during the reference year (2025) was six (6) months and eighteen (18) days, while the maximum recorded duration during 2024-2025 reached approximately one (1) year and eleven (11) months. The average number of guardianship mandated persons available during 2025 was 145.” For the sake of completeness, it could also be noted that: “The implementation of the National Guardianship System has been accompanied by the nationwide application of harmonised Best Interests Procedures, coordinated by the General Secretariat for Vulnerable Persons and Institutional Protection with the support of UNHCR and EUAA. The programme aims to ensure the consistent implementation of Best Interests Assessments (BIAs) through standardised assessment tools and specialised training of certified child protection professionals, thereby reducing multiple interviews and promoting a child-centred and multidisciplinary approach to case management. During 2025, 5,342 Best Interests Assessments were carried out for unaccompanied, separated and children removed from their families residing in accommodation facilities, safe areas, precarious living conditions or homelessness, including children supported within the National Guardianship System. In parallel, eight (8) Training of Trainers sessions were delivered to ninety-two (92) focal points from twenty-four (24) child protection organisations, followed by sixty-three (63) cascade trainings reaching five hundred and fifty-two (552) professionals, contributing to the harmonised implementation of child protection procedures nationwide.”
Since 2024 and up to the end of 2025,⁷³³ a number of structural shortcomings, including the capacity of the system exist. A number of issues have already arisen, first and foremost, delays in appointment of Guardians and/or lack of Guardians in particular for newly arrived unaccompanied children and especially in the mainland⁷³⁴.	165-166	Since information in some points is exacerbated, generalised or repeated please consider reviewing/editing. See also comments below. Please also consider referring either to the Guardianship System or the particular Guardianship project running (but, if possible, not to the “scheme”)

Covering all unaccompanied children and appointing guardians in a timely manner are the main challenges identified in the assessment of the guardianship system by the main actors of the scheme.⁷³⁵ As reported, as of January 2025, 120 guardians have been appointed by the Public Prosecutors,⁷³⁶ 65 a non-sufficient number to cover the need of unaccompanied children present in the country. Also, instability persists due to resignations of appointed Guardians, coupled with delays in the timely disbursement of salaries for both Guardianship Officers and Coordinators by the competent Guardianship Service Providers have been identified as challenges within the system⁷³⁷. Additional gaps in the application of the provisions have been noted and criticized since the institution does not work yet in a unified manner for all children located in Greece.⁷³⁸ According to Save and Children and GCR, despite the establishment of a national guardianship scheme, critical gaps persist, leaving many UASC without legal representation and support. As of early 2025, there are only 128 mandated guardians nationwide, falling short of the target of 170 (or up to 180 if needed)— a figure still far below what is required to meet actual needs. The guardianship programme is hampered by severe bureaucratic delays (e.g. in the Public Prosecutors' offices) and structural weaknesses. Fluctuations in arrivals strain an already overstretched system, while high turnover rates and excessive caseloads undermine effective support. In some cases, children in CCACs/RICs are not being assigned a mandated guardian, delaying access to critical legal support and essential services such as healthcare, psychosocial support, clothing, and other basic needs⁷³⁹.		
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As reported, as of January 2025, 120 guardians have been appointed by the Public Prosecutors, ⁷³⁶ 65 a non-sufficient number to cover the need of unaccompanied children present in the country.	165-166	It should be noted that the phrase “120 guardians have been appointed by the Public Prosecutors”, although a quote from the Commission’s report is misguided. A guardian is a legal entity. The public prosecutor can appoint a guardian and the eligible guardianship service providers to be appointed are only two (2). Guardianship mandated persons are the qualified natural persons/professionals working for the guardian, who are assigned the guardianship tasks from the Guardian (not the public prosecutor). Therefore, while appointments could be hundreds or thousands, these concerned 2 guardians. The guardianship mandated persons in January 2025 were 128. Perhaps number 65 is a typo.
Also, instability persists due to resignations of appointed Guardians, coupled with delays in the timely disbursement of salaries for both Guardianship Officers	166	The terminology relating to guardianship could be harmonised throughout the report. Different terms, including "guardians", "mandated guardians" and "Guardianship Officers", are used interchangeably to describe the same role. It is recommended to consistently use the statutory terminology, namely "guardian" for the legal entity designated to provide guardianship services and "guardianship-mandated person" for the natural person entrusted with the exercise of guardianship on behalf of that entity.
In some cases, children in CCACs/RICs are not being assigned a mandated guardian, delaying access to critical legal support and essential services such as healthcare, psychosocial support, clothing, and other basic needs ⁷³⁹	166	It should be highlighted that all children in RICs and CCACs were represented by a temporary guardianship mandated person (assigned staff of NGOs contracted as the guardianship Service Providers in Greece for the years 2024-2025, METAdrasi, Praksis) and supported by an NGO (Zeuxis) contracted with the Ministry of Migration and Asylum, providing child protection services in the specific safe zones. A lawyer has always been a member of the child protection team on the ground, and a lawyer is supported the temporary guardianship mandated person and if necessary the child.
Chapter of report: RECEPTION CONDITIONS		
In line with these Decisions, the geographical restriction on each asylum applicant who enters the Greek territory through the Eastern Aegean Islands is imposed automatically when the asylum application is lodged before the RAO of Lesbos, Rhodes, Samos, Leros and Chios and the AAU of Kos.	202, 211	The report refers to the "Eastern Aegean Islands" in several instances, including references to Kos and Leros. It may be useful to review this terminology, as Kos and Leros belong administratively to the South Aegean Region (Dodecanese). Where the intention is to refer to the islands hosting Reception and Identification Centres (RICs) or Closed Controlled Access Centres (CCACs), it may be preferable to use this functional designation instead.
	228-229	GSVIP suggests adding where appropriate the following: “The General Secretariat is implementing since 2024 and during 2025 a small accommodation programme for vulnerable single women and single mothers with minor children titled "A Step Forward", in collaboration with Medecins du Monde.”

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.	229	The General Secretariat is competent for the National Emergency Response Mechanism of article 66ΑΓ of law 4939/2022, whereas the National Referral Mechanism (NRM) continues to fall under the competence of the Ministry of Social Cohesion and Family.
NERM is supported by UNHCR (expert support), EUAA, IOM and the European Commission Its operation on the ground is carried out through NGOs Arsis, METAdrasi and the Network for Children's Rights.11	230	It should be noted that, since May 2024 and up until October 2025, the National Emergency Response Mechanism (NERM) of the General Secretariat for Vulnerable Persons and Institutional Protection has been implemented with the operational support of EUAA and IOM, while its activities have been funded under the Swiss–Greek Cooperation Programme (Second Swiss Contribution), through the Swiss State Secretariat for Migration (SEM) of the Federal Department of Justice and Police (FDJP). The mention to UNHCR and European Commission (or EEA Grants which was not included) corresponds to previous years. The European Commission is supporting activities that aim to protect vulnerable groups in Greece and currently funds the national guardianship project and long-term accommodation facilities for UAMs.
The Mechanism also includes a 24/7 telephone hotline for identifying and tracing children in need, which is available in six languages.	230	As correctly noted in previous sections, the telephone hotline does not operate 24/7. It would be preferable to delete the reference to "24/7".
Nevertheless, challenges remained regarding the proper identification of UAM upon arrival, and consequently, cases where UAM have been accommodated alongside the adult population continued to be observed in 2024, at least on the islands, currently 1141	230	The statement appears to be supported by a source referring to the situation in 2021, rather than the reference year 2025. As such, it does not accurately depict the situation during the reporting period and should therefore be removed.
The lack of appropriate care, including accommodation for unaccompanied children, in Greece has been repeatedly raised by human rights bodies.	230	The statement relies exclusively on sources published between 2018 and 2022, none of which relate to the reference year 2025. As such, it does not appear to accurately reflect the situation during the reporting period. It is therefore recommended either to substantiate this statement with evidence relating to 2025 or to clarify that it refers to findings from previous years.
Types of accommodation for unaccompanied children	231	The statistical presentation could be further clarified. The figures of 2,414 (2024) and 1,716 (2025) represent the estimated UAM population by accommodation type as of the respective reference dates, rather than the number of placements carried out during the reporting period. It is therefore suggested that the wording "were placed" be amended accordingly to avoid potential misunderstanding. Finally, the accommodation capacity for 2025 should read 1,745 places in Accommodation Facilities and 155 places in Emergency Accommodation Facilities, amounting to a total capacity of 1,900 places. The reference to 145 places seems to be a typographical error.

Evidently there remains a large number of UAMs that have to remain in R.I.C, CCAC and in other unsuitable sheltering arrangements, with this trend expected to continue, following the MoMA's reported plans to scale back the protection framework for UAM.	231	This seems to be a very misguided statement, starting with the use of the word "evidently", and continuing with "other unsuitable sheltering arrangements", the idea of a "trend", that is also "expected to continue", and the alleged "plans to scale back the protection framework for UAM". This is inaccurate. Please consider removing.
Namely, in a joint statement issued on 21 May 2026, twelve civil society organisations-members of the Child Rights Advocacy Network (CRAN), expressed serious concern over the systematic defunding and operational rollbacks targeting the domestic protection infrastructure for unaccompanied and separated refugee children in Greece.	232	The inclusion of this paragraph is methodologically inconsistent with the scope of the report. As the AIDA report aims to present factual information relating to the reference year 2025, it is not methodologically appropriate to rely on a statement issued in May 2026 to substantiate conclusions regarding the reporting period. Otherwise, we should mention a number of developments that have taken place during the first semester of 2026 and update statistics accordingly.
Shelters for unaccompanied children: long-term accommodation facilities for unaccompanied children (shelters) are managed primarily by civil society entities and charities.	232	Please consider amending as following "Accommodation centers for unaccompanied minors: long-term accommodation facilities for unaccompanied children (shelters) are managed primarily by civil society entities."
Chapter of report: DETENTION OF ASYLUM APPLICANTS		
As mentioned above, following the abolition of 'protective custody' in 2020 (L. 4760/2020) unaccompanied children are not detained in PRDCs and other police establishments. However, newly arrived unaccompanied children remain - depending on the number of the arrivals, in some cases for prolonged periods restricted in CCAC in the Aegean Islands or Malakasa RIC (Attica area) in <i>de facto</i> detention. In practise this measure is a significant backtrack on the protection of unaccompanied children and the abolition of protective custody.	240 (see also pages 70 and 235)	The comparison or correlation appears to conflate two distinct legal and factual situations. Article 43 of Law 4760/2020 did not concern all unaccompanied children, nor did it regulate the reception conditions of newly arrived children at Reception and Identification Centres (RICs) or Closed Controlled Access Centres (CCACs). Rather, it abolished the regime of protective custody, which applied specifically to unaccompanied children who had already been identified within the Greek territory and who, due to the absence of available and appropriate accommodation, could be placed in police custody or Pre-Removal Detention Centres solely for protective purposes until a suitable placement became available. By contrast, the concerns raised relate to newly arrived unaccompanied children remaining in RICs or CCACs during reception and identification procedures under a different legal framework. Presenting this situation as a continuation or reversal of the former protective custody regime conflates two legally distinct measures applying to different categories of unaccompanied children.

Reply General Secretariat for the Reception of Asylum Seekers

Comments of the Reception and Identification Service (RIS)

STATUS

Final RIS reply for publication as a separate AIDA Annex

Scope of the RIS Reply and Publication

The present reply is confined to factual information, administrative practice and legal provisions that fell within the statutory mandate of the Reception and Identification Service (RIS) during 2025. It does not express a position on acts, decisions or procedures for which another authority is competent, and it does not anticipate the separate replies that those authorities may submit.

The Reception and Identification Service requests that this reply be published in full as a separate Annex to the 2025 AIDA Country Report on Greece, in accordance with ECRE's letter of 2 July 2026.

1. Statistics

Reference to statistics extracted from the country report	Page and section	Comments, corrections or additional statistical information
<i>"The RIS registered a total of 50,840 persons during 2025, the majority of whom men (39,903) and women (10,937)..."</i>	pp. 23, 145-146 and 193-194 Statistics / Reception Conditions	Confirmed, with the following official breakdown. RIS annual records for January-December 2025 show 29,622 registrations at the island CCACs and Fylakio RIC and 21,218 registrations in mainland RICs/mobile reception and identification units, for a national total of 50,840. The gender totals are 39,903 male and 10,937 female. Additional context: The age breakdown is 6,214 persons aged 0-13, 4,284 aged 14-17, 32,662 aged 18-34, 7,452 aged 35-64 and 228 aged 65 or over. The report should use the final twelve-month figures consistently instead of the nine-month figures appearing at pp. 193-194.
<i>"Close to 1 in 3 of those registered were registered as vulnerable (15,345)."</i>	pp. 23 and 145-146 Vulnerability statistics	Methodological clarification requested. The published RIS dataset presents counts by vulnerability category. The aggregate of 15,345 is the sum of the category records (7,601 at border RICs/CCACs and 7,744 in mainland facilities). Before translating this aggregate into a proportion of unique persons, the report should clarify whether and how multiple vulnerability characteristics recorded for the same person are de-duplicated. The category totals are: victims of torture 7,222; unaccompanied minors 2,713; single-parent families with minor children 2,454; serious illnesses 948; victims of trafficking 545; pregnant/post-partum women 507; persons with disabilities 364; separated minors 233; elderly persons 173; intellectual/mental disabilities 146; and immediate relatives of shipwreck survivors 40.

Reference to statistics extracted from the country report	Page and section	Comments, corrections or additional statistical information
Table headed "Capacity and occupancy of the reception system: December 2025", combining island data for 31 December 2025 with mainland data "as of June 2025".	pp. 204-205 Housing - Types of accommodation	The table heading and grand total are temporally inconsistent. The island figures are explicitly dated 31 December 2025, whereas the mainland figures are drawn from a parliamentary reply referring to June 2025. They should not be combined under a single "December 2025" heading or used to produce a single year-end occupancy total. Requested correction: Use a clearly dated official year-end population figure. The Ministry's December 2025 Annex records 22,609 residents in the reception system on 31 December 2025: 12,507 in controlled temporary accommodation facilities and 10,102 in RICs/CCACs. Where capacity figures come from a different reference date or source, this must be stated in the table heading and notes.
Island occupancy total of 6,788 persons at the five CCACs.	pp. 59 and 204-205 RIC/CCAC capacity and occupancy	Scope clarification. The figure 6,788 correctly represents the sum of the five named CCACs on 31 December 2025. The Ministry's broader "residents on the islands" table records 7,000 persons because it also includes persons outside the five named CCAC totals, according to the scope described in the official explanatory notes. The report should label each figure according to its precise population and facility scope.

Any additional remarks on statistics: RIS figures should be used with their exact reference date, unit of measurement and population scope. Registrations, transfers, resident population, capacity and vulnerability-category records are separate indicators and should not be combined or treated as interchangeable.

2. Asylum Procedure

Extract from the country report	Page and section	Comments
<i>"The regime of de facto detention has been reintroduced... newcomers might be placed under arbitrary restriction of liberty... in few cases... more than 25 days... decisions... are not always notified."</i>	pp. 68-69 B. Access to the procedure - 2.2.1 Situation upon arrival in CCACs	The passage should be revised so that the legal measure provided for in Article 40 of Law 4939/2022 is not merged with wider legal characterisations. Under Articles 38-40 of Law 4939/2022, a person entering a RIC or CCAC is subjected to reception and identification procedures. A restriction of freedom within the Centre may be imposed only by an individual, written and reasoned decision of the Commander of the competent RIC or CCAC. The initial period is five days. If the procedures have not been completed, the measure may be extended only for the time necessary to complete them and up to an overall maximum of twenty-five days from entry into the Centre. The measure is therefore specific, time-limited and individually ordered. The expressions "arbitrary", "in few cases" and "not always notified" should be retained only if they are supported by identifiable evidence from 2025, stating the facility, period, number of cases and source. The source cited in the draft for the claim concerning periods exceeding twenty-five days relates to an April 2024 visit and cannot, without further evidence, establish a general practice during 2025. This comment concerns only the Article 40 measure applied within RIS facilities. RIS does not comment on any other form of deprivation of liberty outside its competence.
<i>Newcomers are placed in "waiting areas" and have "extremely hindered access" to services before registration.</i>	p. 69 Reception and identification procedures on the islands	The description should be proportionate and facility-specific. The same section acknowledges that in the majority of cases persons awaiting registration are placed directly in accommodation areas and that registration is generally completed within a few days. Any reference to exceptional waiting arrangements should identify the facility, period, operational circumstances and duration, and should not be presented as a uniform nationwide practice. Urgent medical needs are assessed from arrival. The existence of a pending registration step does not remove the obligation to provide emergency care and to identify evident protection needs.
<i>At Fylakio RIC "in few cases, de facto detention... exceeded 25 days", mostly because of transfer delays.</i>	p. 73 2.2.2 Reception and identification procedures in Evros	The same legal distinction applies to the reference concerning Fylakio RIC. Any assertion that the statutory maximum was exceeded should identify the individual administrative act, the relevant dates and the specific 2025 case or cases on which it is based. Transfer arrangements following completion of the reception and identification procedure are not, in themselves, a legal basis for extending the Article 40 measure beyond the statutory maximum.

Extract from the country report	Page and section	Comments
<i>Crete/Gavdos arrivals were allegedly left without reception and identification procedures and/or subjected to automatic detention.</i>	pp. 71 and 215 Reception and identification / Reception conditions	The draft should distinguish the point of arrival and any temporary pre-transfer location from a RIS facility. During 2025, when persons arriving through Crete or Gavdos were referred and transferred to a competent RIS Regional Service, RIS received them and carried out the reception and identification procedures provided for in Articles 38-43 of Law 4939/2022. The absence at that time of a permanent RIS Regional Service at the point of arrival does not, by itself, establish that RIS bypassed the statutory procedure. RIS does not comment on measures taken before a person was referred or transferred to the Service. Any allegation of delay or omission attributable to RIS should identify the date, group and competent RIS facility.

Any additional remarks on the asylum procedure: References to RIS facilities should use the terminology and legal sequence set out in Articles 38-43 of Law 4939/2022. The Article 40 restriction must be assessed by reference to the individual decision, its duration and its notification, rather than by applying a general label to all persons undergoing reception and identification procedures.

3. Reception Conditions

Extract from the country report	Page and section	Comments
<i>“Overall, the Greek reception system has been long criticised as inadequate, not least in the M.S.S. v. Belgium and Greece ruling...”</i>	p. 204 B. Housing - Types of accommodation	Historical jurisprudence should be clearly separated from the factual assessment of 2025. The cited judgments must be accurately reported and are not disputed. However, findings concerning earlier periods should not be presented as direct evidence of the conditions prevailing throughout the 2025 reception system. The final text should distinguish historical findings, subsequent judgments concerning specific applicants, and current year data. The 2025 assessment should include the year-end occupancy figures and acknowledge that the five island CCACs were below nominal capacity on 31 December 2025, while separately assessing any facility-specific or period-specific shortcomings.
<i>Indicator: “Are single women and men accommodated separately? ... Depends/subject to availability of space/capacity.”</i>	p. 207 Conditions in reception facilities	Clarification. Standard accommodation planning provides separate accommodation areas for single women and single men, while preserving family unity. Placement is also adjusted to individual protection needs, vulnerability, age, disability and operational conditions. The indicator should therefore be answered “Yes, as a standard rule, subject to individual protection needs and operational capacity”, rather than implying the absence of a separation policy.

Extract from the country report	Page and section	Comments
<i>“Challenges with regards to the availability of interpretation persisted in 2025... [services halted in July]... 168 interpreters... at the end of 2025, exclusively through... EUAA.”</i>	pp. 196 and 208-209 Interpretation and access to services	The chronology should be completed. Following the interruption of the previous interpretation arrangement, RIS secured coverage through the European Union Agency for Asylum (EUAA) from 4 August 2025. The relevant EUAA operational arrangement is formally in force until 31 December 2026. Accordingly, the report may describe the interruption that occurred before 4 August 2025, but it should also record the date on which coverage resumed and should not imply that interpretation was unavailable throughout the remainder of 2025. Any alleged gap after 4 August 2025 should be identified by facility, language and period, so that it can be checked against the deployment records.
<i>“There is no systematic provision of essential non-food items... Food provided in the facilities is frequently reported as inedible or unsafe.”</i>	p. 209 Conditions in mainland facilities	The two assertions are framed as nationwide conclusions and require facility-specific evidence. Essential non-food items are distributed according to recorded needs, available RIS stocks and partner contributions, taking account of age, family composition, season and vulnerability. Meals are supplied daily under contractual specifications concerning quantity, nutritional composition, food safety and hygiene, with special diets where medically, religiously or age-appropriate requirements apply. A complaint about a particular distribution or meal may be reported and examined. It should not be presented as a general description of all RIS facilities unless the report identifies the facility, date, item or meal and the evidence supporting that conclusion.
<i>“Individuals who are granted international protection are immediately cut off from food and water provision.”</i>	p. 209 Material reception conditions	This is legally inaccurate as a general statement. The report itself correctly states at p. 195 that, following recognition, reception conditions terminate, subject to exceptions, within thirty days of notification of the positive decision. For unaccompanied minors, the relevant period starts upon reaching adulthood. Requested revision: Replace “immediately” with an accurate description of the statutory transition period. Any allegation of earlier termination should be presented as a documented case-specific deviation, not as the legal or general operational rule.

Extract from the country report	Page and section	Comments
<i>“At least five camps had no doctor at all at the end of 2025. This includes Leros, Filippiada, Veria, Kyllini and Pyrgos.”</i> <i>Related passage: “Filippiada, Veria, Kyllini and Pyrgos [had] no doctor at all.”</i>	pp. 208-209 Medical and psychosocial staffing	Correction and terminology clarification. The two passages should identify the precise reference date and distinguish a year-end staffing snapshot from the provision of healthcare services throughout the reporting year. The December 2025 Hippocrates staffing list available to RIS records a full-time general practitioner at Leros. Leros should therefore not be included among facilities described as having no doctor. On the specific year-end reference date, Veria, Kyllini, Pyrgos and Filippiada did not have a physician assigned on site. This is a date-specific staffing position and should not be presented as describing the whole of 2025. RIS records show that Veria had physician coverage until 30 June 2025, while Pyrgos and Kyllini had physician coverage through February 2025. The records also show nursing, midwifery and/or psychosocial staff in the facilities concerned. In Filippiada, no physician accepted a permanent post through the Hippocrates recruitment procedure during the relevant period. Nursing posts remained staffed. Throughout 2025, RIS arranged medical support through the ARSIS/German Doctors mobile medical team, which provided medical examinations, prescriptions where required, childhood vaccinations and other healthcare services. Additional field visits could also be organised through the Hippocrates mobile medical unit on the basis of identified needs. RIS records further show general-practitioner coverage from March to June 2025 and paediatric coverage during April and May 2025. Accordingly, where the report describes a staffing snapshot, it should state the exact date and use the more precise formulation “no physician was assigned on site on the reference date”. The expression “no doctor at all” is imprecise and should not be used to imply either the absence of medical services throughout the reporting year or the absence of access to healthcare.

Extract from the country report	Page and section	Comments
<i>“The MoMA still does not organise regular transportation from the camps to urban centers... residents remain unable to reach essential services.”</i>	p. 209 Location, transport and access to services	The statement is contradicted by RIS operational records and should not be presented as a general conclusion for mainland facilities. During 2025, under the existing framework agreement with a private contractor, RIS organised circular transport movements from mainland facilities to hospitals and other public healthcare structures, Regional Asylum Offices, Hellenic Police services and other competent public services. These movements generally operated during the daytime, approximately from 09:00 to 17:00. This arrangement enabled residents to attend the appointment or service for which the movement had been scheduled and, where time and operational circumstances permitted, to address other personal or administrative matters in the urban centre. Official RIS records for 2025 show 7,774 recorded movements of third-country nationals under these circular transport arrangements across 17 mainland facilities: 5,712 through the Directorate of Northern Greece Facilities and 2,062 through the Directorate of Southern Greece Facilities. The number of scheduled movements and the number carried out were identical in the relevant records. The framework agreement is the contractual basis for these circular transport movements and remains in force until 2027; it is not a separate supplementary mechanism. Together with public transport links and any additional facility-specific arrangements, these documented movements demonstrate that a nationwide conclusion that RIS did not organise transportation, or that residents were unable to reach essential services, is not substantiated. Any identified shortcoming should specify the facility, reference period, destination and transport arrangement concerned.
<i>Descriptions of facilities as “clusters-cages”, an “open prison” environment and structures “more akin to a detention centre”.</i>	pp. 210-211 Security and physical design	Attribution and temporal framing should be retained. These expressions are evaluative quotations from identified third-party sources, including a 2023 letter and a 2024 Ombudsperson report. They should remain clearly presented as attributed assessments and not as neutral factual descriptions generated by the AIDA authors for 2025. Security and access-control infrastructure is intended to protect residents, personnel and facilities and to support orderly operation. Its proportionality can be assessed, but the report should distinguish the existence of security equipment from a legal classification of the facility or of each resident as detained.

Extract from the country report	Page and section	Comments
<i>The report describes substantial obstacles to employment and limited access to skills, documentation and labour-market support.</i>	pp. 217-220 Access to the labour market	The report correctly notes the major legislative change introduced by Article 192 of Law 5078/2023. During 2025, Article 57 of Law 4939/2022 allowed an applicant holding valid documentation to access employment sixty days after the lodging/full registration of the application, subject to the statutory conditions. This replaced the previous six-month waiting period. During the full registration of an application carried out by RIS, each applicant is assigned a Provisional Insurance and Healthcare Number for Foreigners (PAAYPE) and a Tax Registration Number (AFM) through the competent interconnected information systems. These are material elements of practical access to healthcare, social insurance and lawful employment and should be reflected in the report. Within its facilities, RIS also facilitated access to employment information through information sessions, publication of vacancies, CV preparation and referrals. These are supporting actions within the Service's mandate; RIS does not comment on the wider operation of the labour market.
<i>"Upon arrival, the Head of the RIC or of the Closed Control Centre shall refer persons belonging to vulnerable groups... [footnote: Article 40 Asylum Code]."</i>	p. 227 Special reception needs for vulnerable groups	Legal citation correction and RIS operational update. The relevant referral and care provisions form part of the third stage of reception and identification under Article 41 of Law 4939/2022, not Article 40. Article 40 governs subsection to the procedures and the restriction within the Centre. Within its mandate, RIS initiates medical and psychosocial screening upon arrival, identifies vulnerabilities, records relevant information, provides or arranges primary healthcare and psychosocial support services, provides or arranges special reception conditions within its facilities and makes referrals to competent services. Where an urgent medical need is identified, RIS also arranges the transport of the person concerned to a public hospital or health centre. In 2025, RIS used ALKYONI II, updated operational tools and SOPs, designated protection focal points, adopted a Child Protection Policy in December 2025 and continued staff training and awareness actions. These measures should be reflected alongside any documented shortcomings.

Extract from the country report	Page and section	Comments
<i>Access by third parties is subject to prior official authorisation at central level, except for NGOs operating within a site and registered with MoMA.</i>	p. 233 Access to reception centres by third parties	Clarification rather than deletion is appropriate. Article 60(2)(b) of Law 4939/2022 protects contact with relatives, legal advisers, UNHCR and certified organisations and allows restrictions only for security-related reasons. Operational coordination of visits (identity checks, timing, location and safeguarding arrangements) is not in itself a denial of access. The final text should distinguish: (a) access by a lawyer or authorised representative for a specific resident; (b) access by UNHCR or an organisation already operating in the facility; and (c) general visits, research, filming or activities by third parties, for which prior administrative authorisation and coordination may be required. Any alleged denial of legal assistance should be documented as a case-specific incident and not inferred solely from the existence of an authorisation procedure.
<i>Crete and Gavdos: people allegedly remained for days or weeks in unsuitable temporary sites without basic items.</i>	p. 215 Conditions in south-western entry points	The report should not attribute conditions at a temporary pre-transfer location to RIS unless that location was operated by the Service during the stated period. RIS can answer only for the stage following referral or transfer to a competent RIS Regional Service. At that stage, the persons concerned were received and subjected to the reception and identification procedures provided by Law 4939/2022. Any contrary allegation should identify the RIS facility, date, duration and population concerned.
<i>“Differential treatment... towards Ukrainian refugees... created a two-tiered reception system... This distinction continued to apply during 2025.”</i>	p. 233 Differential treatment of specific nationalities in reception	RIS does not submit a substantive comment on this policy comparison. Temporary protection for persons displaced from Ukraine derives from Council Implementing Decision (EU) 2022/382 and from a distinct EU and national legal framework. The comparison between that regime and the Common European Asylum System is therefore a matter of wider European and national policy, not an assessment of a specific RIS procedure. The draft does not identify a particular act or omission by RIS that would establish discriminatory treatment. The expression “two-tiered reception system” should not be attributed to RIS as an operational practice unless a specific RIS measure and the persons affected are identified.

Any additional remarks on reception conditions: Where the report makes a factual claim concerning RIS, it should identify the facility, reference period, affected population and source. Findings from a particular incident, facility or earlier year should not be converted into a nationwide description of 2025 without current and representative evidence. The same standard should apply to positive and negative information.

4. Detention of Asylum Applicants

RIS submits no substantive comments on this chapter. Detention of asylum applicants and return-related detention do not fall within the statutory mandate of the Service. This does not affect the separate RIS comment above on the specific Article 40 restriction within a RIC or CCAC.

5. Content of International Protection

RIS submits no substantive comments on this chapter, as it does not concern the statutory mandate of the Service. The correction regarding the thirty-day transition after recognition appears under

Reception Conditions because it concerns the continuation and termination of material reception conditions in RIS facilities.

6. Additional RIS-specific observations on methodology

Temporal scope: The report is presented as a 2025 update. Material from earlier years should remain clearly dated and should not be described as a continuing 2025 practice without current evidence relating to the relevant RIS facility or procedure.

Fact and assessment: Terms such as “arbitrary”, “prison-like”, “automatic detention”, “inedible” or “unsafe” may form part of an attributed quotation, a judicial finding or the author’s assessment. They should not be presented as established facts about RIS without a clearly identified source and factual basis.

Statistical methodology: The reference date, population covered and unit of measurement should accompany each RIS figure. Registrations, transfers, resident population, capacity and vulnerability-category records measure different matters.

Verification of individual allegations: Where an alleged act or omission is attributed to RIS, the date, facility and procedural stage should be provided, together with an anonymised identifier where possible. This allows the Service to verify the allegation while protecting personal data.

7. Sources relied upon

1. European Council on Refugees and Exiles (ECRE), Draft AIDA Country Report: Greece - 2025 Update.
2. Ministry of Migration and Asylum, Consolidated Reports - Overview, December 2025 - International Protection, Appendix A.
3. Reception and Identification Service, registrations in island CCACs/RICs and Fylakio RIC, January-December 2025.
4. Reception and Identification Service, registrations in mainland RICs/mobile reception and identification units, January-December 2025.
5. Law 4939/2022 (Government Gazette A 111/10.06.2022), in particular Articles 38-44, 47, 57, 59-62 and 109, as in force during 2025.
6. Law 5078/2023 (Government Gazette A 211/20.12.2023), Article 192, amending Article 57 of Law 4939/2022.
7. Ministerial Decision 605869/2022 (Government Gazette B 5392/18.10.2022) concerning PAAYPA.
8. Decision 553695/2023, General Regulation for the Operation of Closed Controlled Access Centres (Government Gazette B 7533/31.12.2023).
9. Council Implementing Decision (EU) 2022/382 on temporary protection for persons displaced from Ukraine.
10. RIS administrative and operational records for 2025 concerning registration, PAAYPA/AFM assignment, EUAA interpretation coverage from 4 August 2025, Hippocrates staffing records for December 2025, mobile medical coverage at Filippiada, and circular transport movements from RIS facilities during 2025.

Prepared exclusively on the basis of the statutory mandate of RIS, the draft AIDA report, official 2025 statistics and the administrative records of the Service.

Reply by the Central Directorate of Citizenship (General Secretariat for Citizenship)

page	Draft report	Proposed correction
262	As regards applicants who are over 62 years old, those who are unable to take a written test due to learning difficulties, and those with a disability certificate of 68% or more, the Adequacy of Knowledge for Naturalisation examinations can be oral. In February 2022, a circular was issued providing more details on the exams procedure.	As regards applicants who are over 62 years old, those who are unable to take a written test due to learning difficulties, and those with a disability certificate of 67% or more , the Adequacy of Knowledge for Naturalisation examinations can be oral. In April 2026 , Decision No. 21536/22-4-2026 of the Secretary-General for Citizenship was issued (published in Government Gazette FEK B 2319/24-4-2026), determining the specific details and procedure for the examinations for the Certificate of Adequacy of Knowledge for Naturalisation (PEGP)
263	EUR 100 fee of is required for the submission of a naturalisation application for refugees. In case of beneficiaries of subsidiary protection, the fee is EUR 550. A EUR 200 fee is required for a re-examination of the case.	...EUR 100 fee is required for the submission of a naturalisation application for refugees. In case of beneficiaries of subsidiary protection, the fee is EUR 550. A EUR 200 fee is required for a re-examination of the case, provided that applicants who paid a reduced fee initially are also entitled to the same reduced fee upon re-submission

Note

The disability percentage for participation in the oral examination procedure for the PEGP was amended by Article 96(1) of Law 5225/2025 (<https://www.ypes.gr/wp-content/uploads/2025/09/n5225-FEKA152-20250100152.pdf>).