Refugee Support Aegean (RSA)
Annual Report 2021

Approved at the Extraordinary General Assembly of 2 February 2022
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Refugee Support Aegean (RSA) in numbers in 2021

Legal & Psychosocial Support

- 509 assisted asylum seekers and recognised refugees
- 18 annulment applications before administrative courts
- 5 annulment applications before the Council of State
- 3 objections against detention before administrative courts
- 7 objections for COVID-19 fines before administrative courts
- 4 cases before the ECtHR
- 855 recipients of interpretation services
- 41 families benefitting from emergency humanitarian assistance

Research & Advocacy

- 3 analyses of Greek and EU legislation
- 4 legal notes on the Greek asylum system
- 3 reports on living conditions for refugees
- 4 submissions to nationals, international and EU bodies
- 20 interventions in conferences, seminars and hearings

Communications

- 31 interviews with domestic and international media
- 4,733 Twitter followers
- 321 citations of RSA material by courts, stakeholders and media

Organisation

- 3 areas of activity in Greece: Chios, Lesvos, Athens
- 4 teams: Legal Support, Research & Advocacy, Communications, Finance & Administration
The main developments in the Greek asylum system in 2021 were as follows:

1. Serious obstacles persist with regard to access to asylum and the Greek territory due to illegal and violent push backs by Greek authorities at land and sea borders, as well as the mainland, to Turkey. Despite the pressure exerted at international and EU level for allegations to be investigated, the Greek government has repeatedly declared that it will not set up an independent border monitoring mechanism.

2. Establishment of a national list of “safe third countries” under JMD 42799/2021 designating Turkey a safe third country for asylum seekers originating from Syria, Afghanistan, Somalia, Pakistan and Bangladesh. As a result of the JMD, the Asylum Service dismisses asylum applications by claimants coming from these five countries without assessing their merits, i.e. the reasons for which they fled their countries.

3. Launch of Closed Controlled Access Centres on the islands of Samos, Leros and Kos, alongside a substantial drop in the population of asylum seekers and refugees on the Eastern Aegean islands to less than 4,000 residents.

4. Increasing tension at EU level relating to movements of recognised refugees from Greece to other countries due to lack of access to social rights and effective international protection. These gaps have been acknowledged by at least three higher administrative courts in Germany and the highest court of the Netherlands. In June 2021, six governments (Germany, France, Belgium, Netherlands, Luxembourg, Switzerland) sent a letter to the European Commission, requesting a review of Greece’s compliance with EU law.

5. Scrutiny of the compatibility of Greek legislation with EU law by the European Commission through the launch of a pilot procedure on potential violations of the Asylum Procedures and Reception Conditions Directives. Nevertheless, Greece has not followed recommendations from civil society on the necessary corrections to its legislation in the context of the September 2021 reform of L 4636/2019 and L 3907/2011.
The RSA Legal Support Team members provided free legal assistance to **509 beneficiaries during 2021**, of whom 249 from Afghanistan, 104 from Syria, 56 from Turkey and 28 from the Democratic Republic of Congo (DRC).

The breakdown of persons supported by the Legal Support Team in active cases in 2021 by country of origin is as follows:

The Legal Support Team provides legal support and representation before competent administrative authorities (Asylum Service, Appeals Authority, Hellenic Police, Reception and Identification Service, Hellenic Coast Guard), independent authorities (Ombudsman), domestic administrative courts, the European Court of Human Rights (ECtHR), EU Agencies (EASO, Frontex) and UN Committees on human rights.

Throughout the year, the Legal Support Team lodged, on behalf of RSA clients:
- 18 applications for annulment of Appeals Authority decisions before the Administrative Court of Athens;
- 5 applications for annulment, including of regulatory acts, before the Council of State;
- 3 objections against administrative detention orders before the Administrative Courts of Athens and Rhodes;
- 10 objections against COVID-19 fines issued by the Coast Guard of Chios and the Police Directorates of Lesvos and Chios;
- 4 applications to the ECtHR, including requests for interim measures under Rule 39 of the Rules of Court.

A detailed account of the activity of the Legal Support Team by area is provided below:
Asylum procedure

Access to the procedure

Against the backdrop of high numbers of allegations of systematic illegal push backs of refugees from the Greek territory in 2021, the Legal Support Team continued to intervene before the competent authorities to ensure that refugees arriving on Greek territory could register asylum applications, in particular in the Evros area. RSA lodged interim measures requests to the European Court of Human Rights (ECtHR) in two cases in the fall of 2021 concerning groups of refugees at risk of imminent push back from the Evros region to Turkey. The Court submitted questions to the Greek Government regarding the detention location of the applicants. The authorities, however, responded after the persons had been unlawfully returned to Turkey.

Safe third country

Support to refugees whose claims are subject to an admissibility assessment based on the “safe third country” remains a priority for RSA. The use of the concept has been expanded to the entire Greek territory following the issuance of JMD 42799/2021 on the designation of Turkey as a “safe third country”. Throughout 2021, the Legal Support Team offered legal assistance and representation to asylum seekers before the Asylum Service, the Appeals Authority and administrative courts and contributed to positive jurisprudential developments on the “safe third country” concept. By way of example, in two cases supported by the team, the 20th Independent Appeals Committee recognised risks of refoulement facing Syrian refugees in Turkey and affirmed the COVID-19 pandemic as a circumstance justifying the making of new (subsequent) asylum applications in Greece. In another case handled by the team, the 10th Independent Appeals Committee ruled that Syrian refugees run the risk of being subjected to a situation of uncertainty in Turkey on account of obstacles to access to lawful residence and to employment.

Finally, in October 2021, RSA and the Greek Council for Refugees lodged annulment applications against JMD 42799/2021 on the designation of Turkey as a “safe third country”. The cases are expected to be heard by the Council of State in March 2022.

Vulnerable groups

<table>
<thead>
<tr>
<th>Project on victims of torture and serious violence on Lesvos</th>
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<tbody>
<tr>
<td>RSA lawyers continued to implement in partnership with Médecins Sans Frontières (MSF) a project on victims of torture and serious violence on Lesvos. A total of 83 persons in 53 cases benefitted from free legal assistance upon referral from MSF.</td>
</tr>
<tr>
<td>Note that MSF phased out their clinic for survivors of torture and violence in Athens after seven years of operation.</td>
</tr>
</tbody>
</table>

In January 2021, the ECtHR communicated the case M.A. v. Greece, App No 18179/20, supported by the Legal Support Team. The Court is examining potential violations of Articles 3 and 13 ECHR by the Greek authorities on account of deficiencies in the identification procedure for victims of torture, as well as violations of Article 34 ECHR due to non-compliance with interim measures ordered by the Court to protect the health and rights of the applicant.
Project on mothers with new-born children & vulnerable families on Lesvos

Since August 2020, RSA has provided support to mothers with new-born children and to vulnerable families mainly on Lesvos under a project privately funded by the PROASYL Foundation / Hans Maier Family. Project activities include the provision of essentials, referral to appropriate reception facilities, and free legal assistance and representation by two lawyers of the Legal Support Team. The team offered support to 25 beneficiaries in 9 cases under the project in 2021.

An illustrative example is the case of a single-parent family with four children from Syria, supported by RSA lawyers in the admissibility procedure pursuant to JMD 42799/2021 on the “safe third country” concept. The Regional Asylum Office of Western Greece declared the case admissible, acknowledging the potent risks faced by women and single-parent families in Turkey, and subsequently granted international protection.

Judicial protection

The Plenary of the Council of State published in October 2021 its decisions on the pilot procedure initiated by RSA in 2020 relating to the constitutionality of judicial review of decisions of Appeals Committees – largely staffed by higher-level judges – by lower administrative courts. The Plenary held by majority that the delegation of competence (by Article 115 IPA and Article 15 N 3068/2002) to first-instance administrative courts to judicially review asylum decisions taken by Appeals Committees is not contrary to the Greek Constitution. It also highlighted that the Appeals Committees are not “courts” but collegial administrative bodies.

The dissenting opinion is of interest. Dissenting judges held that Article 115 IPA contravenes the constitutional principles of rational organisation of the judiciary and of judicial independence and impartiality, since it gives rise to reasonable doubts as to the independence of lower judges’ opinion on decisions issued by hierarchically higher judicial officials, regardless of whether they judicially review a judicial decision or an administrative decision by a quasi-judicial body.

COVID-19 pandemic

RSA continued work on the impact of COVID-19 response on refugee rights, with particular emphasis on quarantine sites operating on Eastern Aegean islands such as Lesvos and Chios for new arrivals.

The Legal Support Team supported cases of asylum seekers at Megala Therma, Lesvos and submitted questions to the Reception and Identification Service (RIS), the Ombudsman and UN High Commissioner for Refugees (UNHCR) on the legal status of new arrivals and on their access to their rights during their stay in the quarantine facility.

In addition, the team supported cases on Chios in filing objections against systematic 5,000 € fines on new arrivals for breaching COVID-19 measures upon arrival in the country.

Dublin Regulation

Throughout 2021, RSA supported asylum seekers in reunification with family members in other European countries under the Dublin Regulation, including 64 beneficiaries in procedures vis-à-vis Switzerland.
Recognised refugees

RSA supported at least **77 beneficiaries of international protection**, including recognised refugees returned to Greece from other European countries e.g. Germany, Netherlands.

<table>
<thead>
<tr>
<th>Judicial scrutiny of returns of recognised refugees to Greece</th>
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<tbody>
<tr>
<td>An increasing number of foreign jurisdictions were called in 2021 to assess the lawfulness of readmissions of beneficiaries of international protection to Greece, in view of serious and structural obstacles to refugees' access to their rights. Against this backdrop, RSA continued to offer crucial evidence on the situation of recognised refugees – and returnees – in the country. It also:</td>
</tr>
<tr>
<td>❖ Submitted a joint third party intervention with the PRO ASYL Foundation in Alaa Asaad v. the Netherlands, App No 31007/20, before the European Court of Human Rights (ECtHR) relating to the compatibility of the readmission of a single-parent family from the Netherlands to Greece with Article 3 ECHR.</td>
</tr>
<tr>
<td>❖ Published a report on access of beneficiaries of international protection to documents and socio-economic rights.</td>
</tr>
<tr>
<td>❖ Participated in a workshop with judges from Dutch administrative courts, organised by the Regional Court of Middelburg.</td>
</tr>
<tr>
<td>❖ RSA lawyers gave evidence as expert witnesses in two hearings before the Administrative Court of Oslo in Norway, regarding cases of readmission of beneficiaries of international protection to Greece.</td>
</tr>
<tr>
<td>RSA reports and interventions played a central role in the assessment by foreign courts of living conditions for refugees in Greece and are cited in judgments of the Council of State of the Netherlands, the Higher Administrative Court of North-Rhine Westphalia, the Higher Administrative Court of Lower Saxony and the Higher Administrative Court of Bremen in Germany, and the Council of Alien Law Litigation in Belgium, which ruled against readmissions of beneficiaries of international protection to Greece in 2021.</td>
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Shipwrecks

The tragic shipwrecks occurring at the end of the year off of Folegandros, Antikythera and Paros brought back painful memories from previous years, as established policies and systematic deterrence practices at EU external borders lead to deadly journeys. Reports from survivors referring to delayed search and rescue operations are a cause for concern.

The RSA team continued to support relatives in identifying victims and in the asylum procedure. The Legal Support Team also represents cases of shipwrecks before the ECtHR, including F.M. v. Greece, App No 17622/21 communicated within 2021, concerning the Agathonisi shipwreck in March 2018 and alleged violations of Article 2 ECHR by the Greek authorities due to delays in search and rescue and the ensuing investigation of the incident.

NGO Registry

An increasing number of national, European and international bodies voiced concerns about the compatibility of the NGO Registry and NGO Members Registry of the Ministry of Migration and Asylum with Greece’s obligations and with human rights
in 2021, RSA submitted an **application before the Council of State for the annulment of JMD 10616/2020** regarding the establishment of the NGO Registry. The case is set to be heard in 2022.

Furthermore, RSA’s registration on said registry was **rejected** in October 2021. RSA submitted an **annulment application against the decision before the Council of State**. The **Ombudsman** has mediated in the case and urged for re-examination, while concerns have been expressed by parliamentarians at **national** and **EU** level, **UN Special Procedures** and **civil society**.
Interpretation and support to the health system

Throughout 2021, RSA offered interpretation services in Farsi in a total number of 855 cases at the “Vostanio” General Hospital of Mytilene.

Support to pharmacies

At the beginning of the year, RSA started supporting asylum seekers and recognised refugees in covering medication costs. The project was piloted on Lesvos and was later expanded to Chios, Samos and Kos. Funds were also granted to individuals to cover medical examinations and consultations on Lesvos, on Chios and in Attica.

Emergency humanitarian assistance

The interruption of monthly cash assistance and reception conditions left asylum seekers and refugees in extreme poverty, unable to cover food and other basic subsistence needs or. In an effort to fill this gap, RSA offered supermarket vouchers to its clients and to vulnerable families living in ESTIA apartments and facing serious health issues and now hunger. These includes persons with special dietary requirements due to chronic illnesses, and many young children. The action mainly addressed families: 5 in Attica, 29 on Samos, 6 on Kos and 1 in Ioannina.

In addition, RSA regularly covered rent and utilities for vulnerable families and persons.

Birth registration

The Legal Support Team lawyers exclusively provided support to 37 cases of newborns and their families at the Registry of Chios for the purposes of registration and name-giving. They also helped address difficulties and legal issues relating to corrections of personal details on civil registration acts.

Computer collection and distribution

In an effort to contribute to remote education needs of refugee children, RSA collected in cooperation with Stin Priza collective 15 computers (laptops and desktops) which underwent minor updates and repairs and were distributed to those in need.
RSA uses research and advocacy to highlight issues and to contribute to the work of national and international bodies responsible for monitoring international and European law through a holistic approach combining liaison with monitoring institutions and procedures with legal action, research and communications.

Throughout 2021, RSA published – as a rule in two languages (Greek and English) – the following outputs:

- 3 comments papers on legislative proposals and initiatives at national and EU level
- 4 legal notes on issues related to the Greek asylum system
- 3 reports on the living conditions of asylum seekers and refugees in different parts of the country
- 1 submission to the Committee of Ministers of the Council of Europe in the framework of supervision of the execution of ECHR judgments
- 3 submissions to EU and UN institutions and agencies
- 1 intervention in a pending case before the ECHR

### Format

<table>
<thead>
<tr>
<th>Format</th>
<th>Title of publication [link]</th>
<th>Date</th>
</tr>
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<tbody>
<tr>
<td>Legal Note</td>
<td>The Workings of the Screening Regulation: Juxtaposing proposed EU rules with the Greek reception and identification procedure [EN]</td>
<td>26 Jan 2021</td>
</tr>
<tr>
<td>Submission</td>
<td>Submission to the European Asylum Support Office Asylum Report [EN]</td>
<td>24 Feb 2021</td>
</tr>
<tr>
<td>Submission</td>
<td>Submission to the European Commission Rule of Law Report [EN]</td>
<td>05 Mar 2021</td>
</tr>
<tr>
<td>Legal Note</td>
<td>Rule of law capture by a Statement</td>
<td>EU-Turkey deal: 5 Years of Shame [EN]</td>
</tr>
<tr>
<td>Submission</td>
<td>Submission to the UN Universal Periodic Review [EN]</td>
<td>17 Mar 2021</td>
</tr>
<tr>
<td>Legal Note</td>
<td>Beneficiaries of international protection: Access to documents and socio-economic rights [GR, EN]</td>
<td>22 Mar 2021</td>
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<tr>
<td>Comments</td>
<td>Comments on the family law reform bill [GR, EN]</td>
<td>29 Mar 2021</td>
</tr>
<tr>
<td>Legal Note</td>
<td>New Pact on Migration and Asylum</td>
<td>Interpretation of provisions in Greek case law [GR, EN]</td>
</tr>
<tr>
<td>Submission</td>
<td>Submission to the Council of Europe in the M.S.S. and Rahimi cases [EN]</td>
<td>30 Apr 2021</td>
</tr>
<tr>
<td>Report</td>
<td>Administrative detention: A human rights black hole [GR, EN]</td>
<td>22 Jun 2021</td>
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<tr>
<td>Comments</td>
<td>Comments on the Deportations &amp; Returns Bill [GR, EN]</td>
<td>28 Jun 2021</td>
</tr>
<tr>
<td>Policy Note</td>
<td>The right to asylum in the context of “instrumentalisation” – Lessons from Greece [EN]</td>
<td>18 Nov 2021</td>
</tr>
<tr>
<td>Report</td>
<td>Refugees in Greece experience third month of humanitarian crisis and hunger [GR, EN]</td>
<td>23 Dec 2021</td>
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</table>

Furthermore, RSA advocated its positions through contact with institutions such as the European Parliament, as well as presentations and interventions by RSA staff in at least 20 discussions, conferences and seminars organised in 2020 at domestic and European level:
<table>
<thead>
<tr>
<th>Institution</th>
<th>Title</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>European Parliament</td>
<td>Crisis Regulation proposal shadows’ meeting</td>
<td>08 Feb 2021</td>
</tr>
<tr>
<td>European Parliament</td>
<td>Roundtable on access of refugee children to education, by MEP Kostas Arvanitis</td>
<td>22 Feb 2021</td>
</tr>
<tr>
<td>Oxfam &amp; Refugee Rights Europe</td>
<td>Seminar: ‘5 Years of EU Refugee Response in Greece’ [EN]</td>
<td>18 Mar 2021</td>
</tr>
<tr>
<td>Eerste Kamer, Netherlands</td>
<td>Hearing on the New Pact on Migration and Asylum</td>
<td>23 Mar 2021</td>
</tr>
<tr>
<td>Regional Court Zeeland-West Brabant, Netherlands</td>
<td>Workshop on beneficiaries of international protection in Greece</td>
<td>30 Mar 2021</td>
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<tr>
<td>Racist Violence Recording Network</td>
<td>Annual Report 2020 launch</td>
<td>22 Apr 2021</td>
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<tr>
<td>National Commission for Human Rights</td>
<td>Working Group on the push backs recording mechanism</td>
<td>24 Apr 2021</td>
</tr>
<tr>
<td>Parliamentary Assembly of the Council of Europe</td>
<td>Hearing on reception conditions in Greece</td>
<td>10 May 2021</td>
</tr>
<tr>
<td>National Commission for Human Rights</td>
<td>Hearing on the New Pact on Migration and Asylum</td>
<td>12 May 2021</td>
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<tr>
<td>Dutch Council for Refugees</td>
<td>Werkgroep Rechtshulp aan Vluchtelingen (WRV)</td>
<td>18 May 2021</td>
</tr>
<tr>
<td>National Kapodistrian University of Athens</td>
<td>Seminar: “Διαχείριση των Εξωτερικών Συνόρων της ΕΕ στον Έβρο, στο Αιγαίο και την Ανατολική Μεσόγειο”</td>
<td>08 Jun 2021</td>
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<tr>
<td>Vluchtelingenwerk Vlaanderen</td>
<td>Training: ‘Vormingsreeks Dublin: Griekenland’</td>
<td>08 Jun 2021</td>
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<tr>
<td>Médecins Sans Frontières</td>
<td>Roundtable: ‘Health of migrants in containment settings’</td>
<td>17 Jun 2021</td>
</tr>
<tr>
<td>UN Special Rapporteur on human rights defenders</td>
<td>Hearing with human rights defenders in Greece [EN]</td>
<td>29 Sep 2021</td>
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<tr>
<td>Academy of European Law (ERA)</td>
<td>Annual Conference on Asylum and Migration Law 2021</td>
<td>22 Oct 2021</td>
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<tr>
<td>Heinrich Böll Stiftung</td>
<td>Roundtable on the EU-Turkey deal</td>
<td>15 Nov 2021</td>
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<tr>
<td>University of Copenhagen</td>
<td>Seminar on the EU-Turkey deal</td>
<td>01 Dec 2021</td>
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<tr>
<td>UNHCR</td>
<td>Training of Asylum Service Registry Lawyers</td>
<td>09 Dec 2021</td>
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</tbody>
</table>

The RSA Research & Advocacy Team also supported and met with parliamentary missions to Greece in the course of 2021, including by: Steffi Krisper (Austria), Eva Platteau (Belgium), Ben Segers (Belgium), Tineke Strik (European Parliament), Cornelia Ernst (European Parliament), Sira Rego (European Parliament), as well as the official visit of the Civil Liberties, Justice and Home Affairs (LIBE) Committee of the European Parliament in November 2021.

**Contribution to the legislative process**

RSA continued to contribute to the legislative process and to efforts to ensure that Greek law complies with international and European law. In 2021, the Research & Advocacy Team published comments on the deportations and returns bill (adopted as L 4825/2021) and on the family law reform bill (adopted as L 4800/2021). Comments were submitted in public consultation and were transmitted to relevant actors.
### RSA advocacy on the transposition of the EU Asylum Directives

Bringing Greek legislation (namely the IPA and L 3907/2011) in line with the EU asylum acquis, namely the Asylum Procedures Directive (2013/32/EU), the Reception Conditions Directive (2013/33/EU) and the Return Directive (2008/115/EC), was a priority for RSA in 2021. RSA combined research and advocacy activities with targeted legal actions to raise awareness on the topic and to put pressure on the European Commission to launch infringement proceedings against Greece due to systematic non-compliance with EU law requirements. In the course of the year, RSA:

- Lodged **complaints with the European Commission** on behalf of three asylum seekers on Eastern Aegean islands regarding violations of EU law stemming from non- or incorrect transposition of Articles 10(3)(b), 12(1)(d), 31(6), 38(2) and 46(7) of the Asylum Procedures Directive and Articles 7, 8, 25 and 26 of the Reception Conditions Directive.

- Submitted together with legal organisations **detailed proposals for amendments of the IPA and L 3907/2011** in the public consultation of the deportations and returns bill, to bring domestic law in line with EU Directives. The recommendations were, however, fully disregarded by the Ministry of Migration and Asylum.

- Submitted together with legal organisations a **detailed catalogue of relevant legislative provisions** to the Civil Liberties, Justice and Home Affairs (LIBE) Committee of the **European Parliament** in the context of its delegation visit to Greece in November 2021.

- Raised the issue in bilateral contacts with the European Commission and MEPs.

### Contribution to parliamentary scrutiny and the work of monitoring bodies

Throughout 2021, RSA prepared submissions relating to the Greek asylum system *inter alia* to the European Commission **Rule of Law Report**, the EASO **Asylum Report**, the Council of Europe Committee of Ministers and the **Universal Periodic Review** of the UN Human Rights Council.

### RSA documentation and advocacy on push backs of refugees

Illegal push backs of refugees by Greek authorities at land and sea borders have been a core subject for human rights and EU law monitoring bodies in 2021. During the year, RSA mobilised different mechanisms at European and international level as follows:

- RSA and 5 other civil society organisations submitted a **report** to the UN Special Rapporteur on the Human Rights of migrants relating to systematic push backs practices at land and sea borders.

- **Υπέβαλε, υπό τη μορφή κοινής επιστολής 5 οργανώσεων της κοινωνίας των πολιτών, ερωτήσεις στην Ευρωπαϊκή Επίτροπο Εσωτερικών Υποθέσεων, Ylva Johansson, σχετικά με τις συστηματικές πλημμέλειες στην τήρηση του ενωσιακού κεκτημένου στα ελληνικά χερσαία και θαλάσσια σύνορα, η οποία απαντήθηκε τον Ιούλιο του 2021.**

- **Δημοσιοποίησε εμβληματικές υποθέσεις τις οποίες υποστηρίζει η Ομάδα Νομικής Υποστήριξης, όπως η περίπτωση Σύρου πρόσφυγα, ο οποίος επαναπροωθήθηκε**
At the same time, the Research & Advocacy Team continued its contact and cooperation with MPs and MEPs with a view to strengthening parliamentary scrutiny, namely through parliamentary questions at domestic and European level on issues such as the functioning of asylum procedures and of immigration detention, or the implementation of JMD 42799/2021 on the “safe third country” concept.

**Transparency and data collection on asylum**

Transparent and accurate official information on asylum is a prerequisite for sound understanding of current conditions and needs in Greece. RSA put significant emphasis on data collection, analysis and interpretation in 2021, in particular by supporting parliamentary scrutiny processes. This led to the publication of statistics on immigration detention and judicial review thereof, and to awareness of the persisting obstacles to accurate and credible data on asylum. For example, competent authorities – Ministry of Citizen Protection, Ministry of Migration and Asylum, Ministry of Justice – hold widely diverging statistics and provided contradictory figures to the same parliamentary questions on detention.

**Strengthening Greek jurisprudence: the Greek Asylum Case Law Report**

RSA, the Greek Council for Refugees and HIAS Greece launched a collection of asylum case law from national courts and administrative authorities, with the aim of contributing to filling existing gaps in the dissemination of Greek asylum jurisprudence and to informing the legal and broader community of jurisprudential developments in the field.

The first issue of the Greek Asylum Case Law Report was published at the end of December 2021. It contains excerpts from 127 decisions issued in 2020-2021 by Administrative Courts, the Independent Appeals Committees and the Asylum Service relating to topics such as the interpretation of the “safe third country” concept, evidence assessment and refugee status determination, procedural safeguards in the asylum procedure, the workings of administrative appeals and of judicial protection of asylum seekers, the rights of beneficiaries of international protection, as well as immigration detention.
Media work and social media

Media interviews

Throughout 2021, RSA staff gave at least **31 interviews** to national (e.g. in.gr, Ethnos, Efysyn, Avgi, Skai) and international media (e.g. The Economist, The Guardian, AFP, EU Observer, Al Jazeera, Deutsche Welle, Balkan Insight, The New Humanitarian, El País). Examples are provided below:

<table>
<thead>
<tr>
<th>Member</th>
<th>Team</th>
<th>Outlet [link]</th>
<th>Date</th>
</tr>
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<tbody>
<tr>
<td>Natassa Strachini</td>
<td>Legal Support</td>
<td>Ethnos [GR], Lifo [GR],</td>
<td>15 Sep 2021</td>
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<td>AFP [EN]</td>
<td>06 Jun 2021</td>
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<td>Marianna Tzefterakou</td>
<td>Legal Support</td>
<td>Efysyn [GR], InfoMigrants [EN]</td>
<td>10 May 2021</td>
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<td>16 Jul 2021</td>
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<td>Yiota Massouridou</td>
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<td>29 Jun 2021</td>
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<td>Eleni Spathana</td>
<td>Legal Support</td>
<td>Efysyn [GR]</td>
<td>05 Apr 2021</td>
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<td>Efi Latsoudi</td>
<td>Legal Support</td>
<td>The Press Project [GR],</td>
<td>23 Jan 2021</td>
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<td>Avgi [GR], Lesvos News [GR]</td>
<td>22 Apr 2021</td>
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<td>09 Jun 2021</td>
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<td>Naiem Mohammadi</td>
<td>Legal Support</td>
<td>Al Jazeera [EN], Deutschlandfunk [DE]</td>
<td>02 Jan 2021</td>
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<td>18 Jan 2021</td>
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<td>Minos Mouzourakis</td>
<td>Research &amp; Advocacy</td>
<td>The Economist [EN], The Guardian [EN]</td>
<td>07 Aug 2021</td>
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<td>El País [ES], NOS [NL]</td>
<td>05 Nov 2021</td>
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<td>To Vima [GR]</td>
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Social media presence

RSA maintains a strong social media presence, particularly with a steadily increasing following of its account on Twitter. The total number of followers of the RSA account rose from 3,927 at the end of 2020 to 4,733 at the end of 2021.

The RSA Facebook account has **1,595 followers**.

Campaigns

The EU-Turkey “deal” has symbolised an institutional deviation at an unspeakable cost for people seeking refuge in Europe and for local communities on the Eastern Aegean islands since March 2016. With EU support, the “deal” acts as a lever for the systematic dismantling of the Greek and European legal order and contributes to rule of law backsliding in Europe.

RSA and the PRO ASYL Foundation launched a campaign in March 2021, five years after the signature of the “deal”, highlighting its implications through a series of outputs on the main factors revealing its complete failure:
1. **Policy note** on the need to end this institutional deviation
2. **Legal note** on the capture of the rule of law by a “statement”
3. **Online photo exhibition** by Giorgos Moutafis on the Moria nightmare
4. **Expert views** on the repercussions for the children of the “deal”
5. **Illustrative stories** of refugees who faced the consequences of the implementation of the “deal”
6. **Documentary** by Ahmed Ebrahimi on the vicious circle of signatures and on survival in the Reception and Identification Centres
7. **Online roundtable** with refugees and islanders, moderated by journalist Fotini Lambridi

**Citations of RSA material**

RSA publications continued to contribute to the work of jurisdictions in other countries, EU institutions, international organisations, civil society organisations, researchers and the media.

RSA recorded at least **321 citations of its material** in 2021, including:

- 83 in case law of domestic and foreign jurisdictions, namely in Germany, Belgium, Austria, Switzerland and the Netherlands;
- 56 in reports and documents of authorities, researchers, civil society organisations.
- 182 in media.
RSA counts 15 staff members, including 8 lawyers, active on Chios, Lesvos and Athens. The organisational structure of the organisation, available on its website, comprises of the following teams: Legal Support, Research & Advocacy, Communications, Finance & Administration.

In addition to its Chios headquarters, RSA operates a branch office in Athens and as of recently on Lesvos.

Registration on the NGO Registry

In keeping with national legislation requirements – JMD 3043/2020, as replaced by JMD 10616/2020 – RSA filed an application to register with the NGO Registry of the Special Secretariat for Stakeholder Coordination at the Ministry of Migration and Asylum on 11 June 2020. The application was rejected on 25 October 2021, even though a positive recommendation had been issued all required conditions were met. RSA has lodged a judicial review application against the decision before the administrative courts and is preparing a new registration application.

RSA is registered on the EU Transparency Register under No 583270644066-47.

RSA has a Quality Assurance System covering its legal support, research and advocacy activities, in line with the ISO 9001:2015 model. RSA was awarded a three-year ISO 9001:2015 quality assurance system certification by EQA on 16 November 2020.

Cooperation with the PRO ASYL Foundation

RSA continues its collaboration with the PRO ASYL Foundation, PRO ASYL, a leading human rights organisation in Germany, has RSA as its exclusive partner in Greece, and has undertaken joint actions in 2020 at national and European level.

Synergies and networks

To 2021, η RSA συνέχισε τη συνεργασία της με τους Γιατρούς Χωρίς Σύνορα (MSF) στη Λέσβο, δεχόμενη την παραπομπή ιδιαίτερα ευάλωτων ασθενών του γραφείου τους για την παροχή δωρεάν νομικής συνδρομής σε όλους τους βαθμούς διαδικασιών σαύλου, σε επαπειλούμενες απελάσεις / επανεισδοχές και σε ζητήματα σχετικά με τις συνθήκες υποδοχής και την κράτηση.

RSA is an active member of the Racist Violence Recording Network and systematically documents racially motivated violence on the islands of Lesvos, Chios and the mainland.

RSA participates in the newly founded Informal Forced Returns Recording Mechanism of the National Commission for Human Rights.

Finally, RSA participates in regular meetings of the Legal Aid Working Groups organised by UNHCR on Lesvos, Chios and Athens, and chairs the CEAS Sub-Working Group. RSA also participates in meetings of the Advocacy Working Group of civil society organisations in Athens.
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