

REPORT

# RECOGNISED REFUGEES 2025

MARCH 2025

Access to documents  
and socio-economic rights

stiftung  
PRO ASYL

RSA  
REFUGEE SUPPORT AEGEAN

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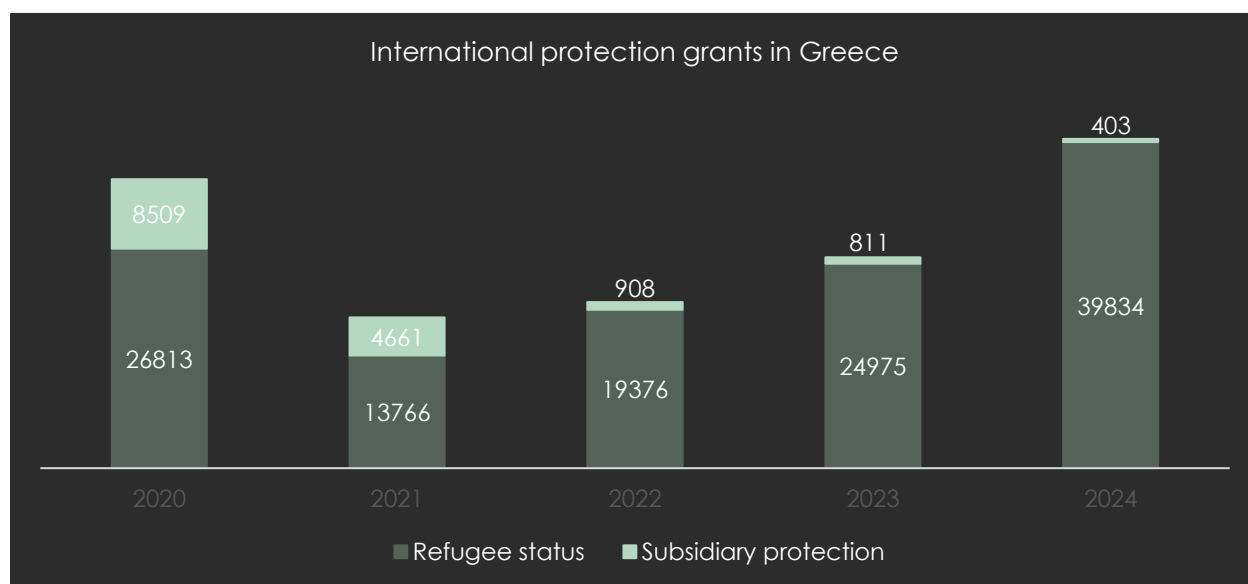
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# Introduction

## Key figures

Greece has approved more than 140,000 asylum applications in the last five years. The number of positive decisions has gradually increased from 2021 to 2024, leading up to more than 40,000 status grants in the last year alone:



Source: Ministry of Migration and Asylum, Statistics, [here](#)

At the end of 2024, Greece counted 83,895 active international protection [Residence Permits](#) and 32,572 temporary protection residence permits.

## Lack of coordination on integration & deficiencies in services

Provision of the rights and entitlements attached to international protection status is a state task spanning across different branches of government, namely at least six different ministries in Greece. The very same administrative procedure may involve various public services operating under different ministries. For example, responsibility for the issuance of [Residence Permits](#) lies with both the Asylum Service under the Ministry of Migration and Asylum and the Hellenic Police under the Ministry of Citizen Protection. The two authorities seem to hold diverging views as to the causes of chronic delays in the renewal of residence permits, as discussed below.

Against this backdrop, the Directorate-General for Migration and Home Affairs (DG HOME) of the European Commission has emphasised in its dialogue with Greece the importance of "establishing

a seamless collaboration and communication framework among various governmental departments and ministries to ensure a unified, coherent approach to the integration process".<sup>1</sup>

The Task Force on migrant integration was launched by the Greek government in 2024 as a tool to address cross-cutting challenges to refugee integration.<sup>2</sup> Yet, said Task Force appears to be restricted to a "'high-level discussion' format" according to the European Commission,<sup>3</sup> and does not seem to have addressed the chronic legal and practical obstacles to beneficiaries' access to documents and socio-economic rights in Greece. These include "key points of concern with regards to integration and relevant challenges... (i.e. issue of AMKA, bank accounts, Helios+, residence permits, Minimum Guaranteed income, access to education etc)", which continue to attract concern from the European Commission.<sup>4</sup>

The past year in particular was marked by a near-total halt of basic services for refugees in Greece: withdrawal of interpretation services in camps; persisting shortages in medical and psychosocial personnel; complete suspension of the monthly financial allowance granted to asylum seekers, to name a few.<sup>5</sup> Chronic weaknesses in funding and programme management on the part of the Ministry of Migration and Asylum have led to "severe gaps in services due to framework contract interruptions (e.g., interpretation, transportation, and cash assistance)"<sup>6</sup> with direct, nefarious repercussions on the tens of thousands of people obtaining international protection and on their prospects of integration in the country.

Despite persisting, chronic challenges described throughout this report, the Greek state retains its policy of demanding immediate autonomy and self-sufficiency of beneficiaries of international protection. People are still expected to vacate the accommodation places they occupied in camps during their asylum process within 30 days of getting asylum. Material reception conditions are immediately ceased upon issuance of a positive asylum decision (see [Housing](#)).

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<sup>1</sup> European Commission, Letter to the Minister of State, Ares(2023)8268343, 4 December 2023, 9.

<sup>2</sup> European Commission, 'Task Force on migrant integration launched in Greece', 28 May 2024, available [here](#).

<sup>3</sup> European Commission, Email correspondence: 'Mission Report – Acting Director-General Beate Gminder to Greece – 15-16 July 2024', Ares(2024)6952325, 26 July 2024, 3.

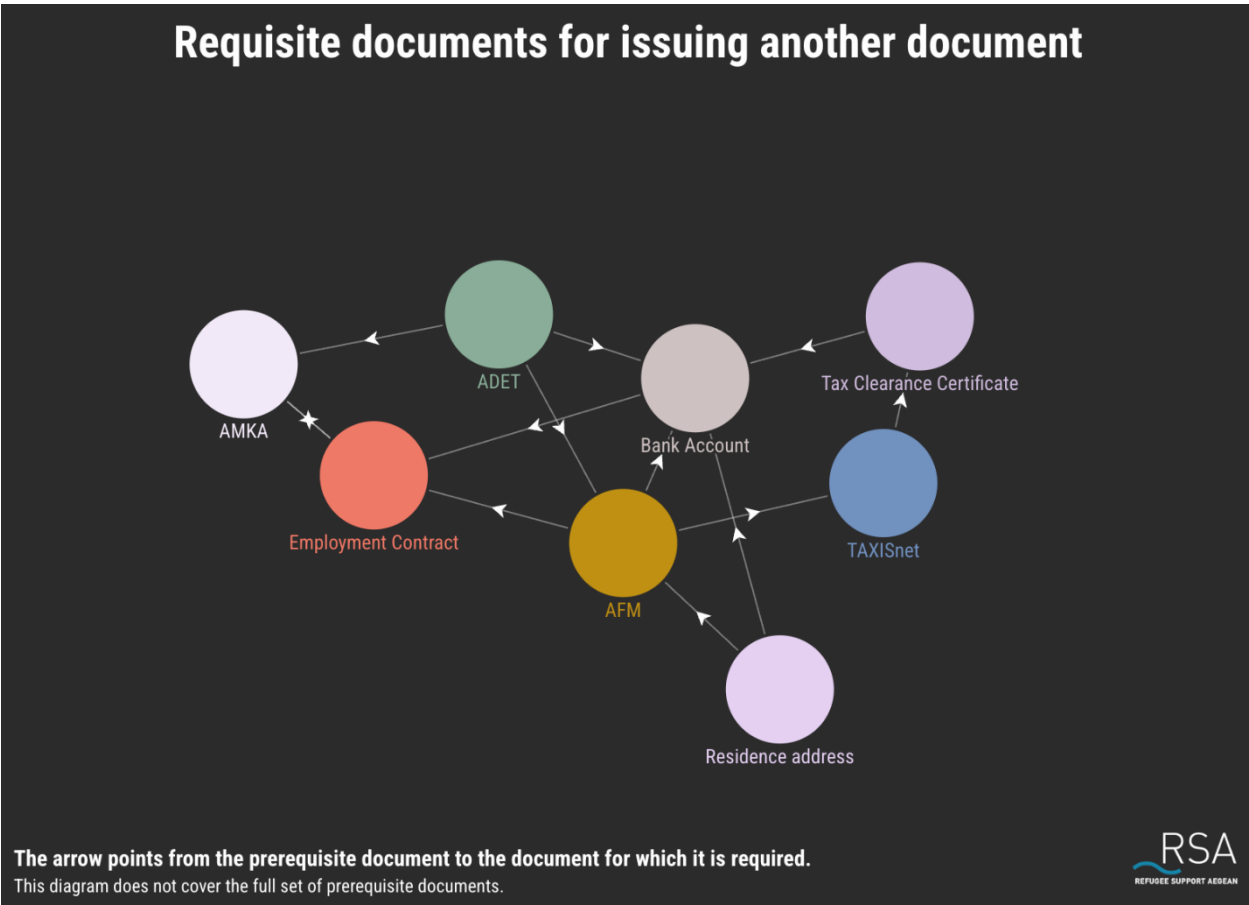
<sup>4</sup> *Ibid.*

<sup>5</sup> Namely, RSA, 'Major deficiencies in the provision of interpretation services in Greece', 5 November 2024, available [here](#); 'Suspension of financial assistance to asylum seekers in Greece since May 2024', 1 October 2024, available [here](#); 'Persisting severe reception deficiencies in understaffed camps', 5 September 2024, available [here](#).

<sup>6</sup> European Commission, *Mission Report: Technical visit to Samos and Athens – September 2024*, Ares(2024)6443981, 11 September 2024, 2.

# Essential documents

Access to key rights and transactions of beneficiaries of international protection with the Greek administration is conditioned on possession of a series of essential documents, issued by different authorities. The process for obtaining those documents is often complex and at times circular, as failure to issue one document may in turn prevent refugees from fulfilling formal requirements for other documents.



In our experience, there are no indications pointing to preferential treatment being given to a particular nationality or language group in the process of issuance of the different documents that are essential for participation in public life in Greece.

## Residence permit (ADET)

The prospective Qualification Regulation entering into force in 2026 requires Member States to issue a residence permit to beneficiaries of international protection within 90 days from the notification of the positive asylum decision.<sup>7</sup>

In Greece, the residence permit (*Άδεια Διαμονής Ενιαίου Τύπου*, ADET) is valid for three years in the case of refugees and one year in the case of subsidiary protection holders.<sup>8</sup> ADET is a prerequisite for obtaining and maintaining a Social Security Number (*Αριθμός Μητρώου Κοινωνικής Ασφάλισης*, AMKA), for opening a bank account, for accessing employment, for receiving social benefits, even for movement within the Greek territory. The European Commission stresses that "The issuance and renewal of resident permits is the initial and first formality that serves as a prerequisite for others and yet is the most important bottleneck."<sup>9</sup>

The responsible authority for issuing residence permits to beneficiaries of international protection in Greece is the Asylum Service, yet certain stages of the process are delegated to the Hellenic Police:



### First step: ADET Decision by the Asylum Service

#### *Initial ADET approval*

The process of granting ADET to beneficiaries of international protection starts with the issuance of an "ADET Decision" by the Asylum Service. This decision is issued by the Regional Asylum Office (*Περιφερειακό Γραφείο Ασύλου*, RAO) or Autonomous Asylum Unit (*Αυτοτελές Κλιμάκιο Ασύλου*, AAU) that granted international protection to the person concerned<sup>10</sup> and consists in an approval of the grant of the residence permit. The asylum decision is a necessary but not sufficient condition for the issuance of the residence permit.

<sup>7</sup> Article 24(2) Regulation (EU) 2024/1347 of the European Parliament and of the Council of 22 May 2024 on standards for the qualification of third-country nationals or stateless persons as beneficiaries of international protection, for a uniform status for refugees or for persons eligible for subsidiary protection and for the content of the protection granted [2024] OJ L 22.5.2024.

<sup>8</sup> Article 23(1) Greek Asylum Code, L 4939/2022, Gov. Gazette A' 111/10.06.2022.

<sup>9</sup> European Commission, Letter to the Minister of State, Ares(2023)8268343, 4 December 2023, 10.

<sup>10</sup> The Attica Directorate of the Asylum Service includes three RAO and six AAU in the Attica region: Article 29 PD 106/2020, as amended by Article 10 PD 77/2022.

According to the ADET Regulation, the ADET Decision shall be incorporated in the asylum decision issued by the Asylum Service or the Appeals Authority.<sup>11</sup> In any case, it shall be notified to the beneficiary on the same day as the asylum decision, in line with a Ministry of Migration and Asylum Circular.<sup>12</sup> Despite this rule, at the time of writing, the Asylum Service still issues ADET Decisions as separate administrative acts which it notifies to the persons concerned together with the decision approving the asylum application.

Substantial administrative barriers already emerge at that stage which obstruct refugees' access to the ADET grant procedure:

**Gaps in formal elements of Asylum Service decisions** are a recurrent issue in cases supported by RSA. For instance, beneficiaries' personal details such as gender may be omitted or incorrectly recorded in ADET Decisions. Correcting these Asylum Service decisions can be particularly problematic due to technical limitations on the uploading of corrigenda on the "Alkyoni II" database of the Asylum Service and on access thereto by the Hellenic Police.

Moreover, several asylum decisions and ADET Decisions bear neither signature nor stamp or are signed by a different official to the one issuing the decision. The problem is notably encountered in decisions notified to people via email, per systematic Asylum Service practice<sup>13</sup> even for asylum seekers who reside in camps of the Greek reception system and should thereby have their decisions notified in person.<sup>14</sup>

These issues create bottlenecks in the **Second Step** described below, as the Hellenic Police does not accept these Asylum Service decisions as valid documents for the submission of an application for ADET.

**Case study: Kabir\*, Soraya\*** and their two children are refugees from Afghanistan. The family was accommodated in CTRC Ritsona and was granted refugee status in September 2024. They received their positive asylum decision and ADET Decisions via email – the former bore no signature. Following their request for an appointment to apply for ADET, the Aliens Unit of Attica of the Hellenic Police informed the family's lawyers that in order for an appointment to be scheduled "the refugee status decision will first have to be signed and sealed (digitally or manually) by the Asylum Service of Piraeus, since the one you have sent us is not signed."

One day later, the RSA lawyer wrote to RAO Piraeus to request a signed copy of the family's asylum decision. RAO Piraeus replied that its caseworkers no longer digitally sign decisions and advised that the signed copy of the decision be collected in person one week later. The RAO specifically requested the lawyer, not the applicants, collect the decision "due to the lack of interpretation".

<sup>11</sup> Article 2(1) and (3) ADET Regulation, JMD 513542/2022, Gov. Gazette B' 4763/12.09.2022.

<sup>12</sup> Ministry of Migration and Asylum, Circular 68883/2023 – Εγκύκλιες οδηγίες σχετικά με την εφαρμογή της με αρ. 513542 Κοινής Υπουργικής Απόφασης (ΦΕΚ Β' 4763/12.09.2022) «Διαδικασία χορήγησης Άδειας Διαμονής Ενιαίου Τύπου στους δικαιούχους διεθνούς προστασίας», 31 January 2023, 2.

<sup>13</sup> Note e.g. European Commission, *Updated Samos report*, Ares(2024)7041697, 5 August 2024, 2.

<sup>14</sup> Article 87(4) Greek Asylum Code provides that persons residing in the reception system shall receive their decisions in their camp of residence. The rule therefore prohibits email notifications of decisions to people residing in camps: Administrative Court of Thessaloniki, ΑΔ6/2025, 13 January 2025; Administrative Court of Athens, ΝΔ324/2024, 28 June 2024, para 8, available [here](#).

**Territorial competence of the issuing office:** The RAO or AAU of the Asylum Service which issues the ADET Decision and asylum decision must correspond to the territorial competence of the Passport Office of the Hellenic Police which will receive the documents and print the ADET, as described in the [Second Step](#) of the process below. For instance, the Aliens Unit of Attica (Τμήμα Αλλοδαπών Αττικής, ΤΑΑ) is territorially competent for cases handled by the RAO and AAU of Attica,<sup>15</sup> where most ADET requests are filed.<sup>16</sup> Otherwise, the Hellenic Police does not accept the ADET application, and the beneficiary of international protection must refer again to a territorially competent RAO or AAU in order to obtain exact copies of their asylum decision and ADET Decision, stamped by that office. This issue often emerges in the case of people who submit an asylum claim on the islands, are subsequently transferred to the mainland by the authorities and are then recognised as refugees by a decision of the initial RAO, often notified via email.

Further obstacles arise in the peculiar case of children born in Greece after their family has lodged an asylum application. These children are at times registered by the Asylum Service under a different case number to that of their family members. This creates longer delays and challenges in the issuance of ADET for the entire family.

#### *ADET renewal*

ADET renewal applications must be submitted to the Asylum Service no later than 30 days prior to the expiry of the permit. Late renewal applications without due reasons face a 100 € fine.<sup>17</sup> A Circular of the Ministry of Migration and Asylum specifies that “reasons” should be interpreted as follows: “the mere submission of any reason for negligence on the part of the beneficiary in submitting the application in time shall not suffice. Reasons shall be given which in fact justify exceeding of the deadline set by law on the basis of objective criteria or events, without mandatory written evidence. The reasons invoked by the applicant shall be accepted where they are in line with the conduct of the ordinary reasonable person.”<sup>18</sup>

Beneficiaries of international protection wishing to renew their ADET must submit a “Residence Permit Renewal Application” with a digital photograph to the AAU Beneficiaries of International Protection, the only competent unit of the Asylum Service to receive and process renewal applications.

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<sup>15</sup> Article 5(1) ADET Regulation.

<sup>16</sup> Hellenic Police, ‘Δικαιούχοι διεθνούς προστασίας – Επιστολή νομικών οργανώσεων’, 1619/24/258242, 11 December 2024, para 1.

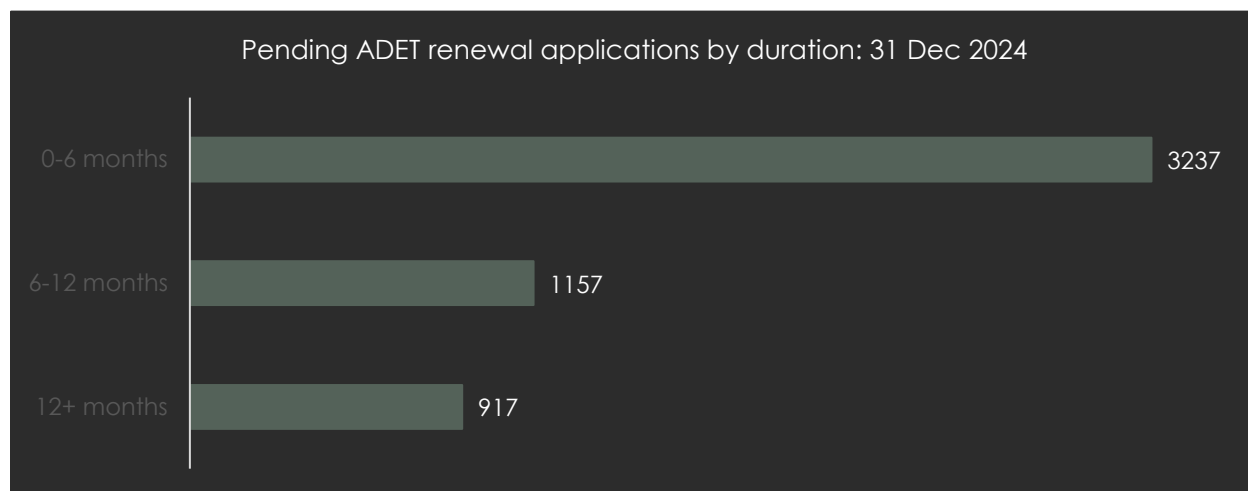
<sup>17</sup> Article 23(1) Asylum Code; JMD 513551/2022, Gov. Gazette B’ 4763/12.09.2022.

<sup>18</sup> Ministry of Migration and Asylum, Circular 69244/2023 – Εγκύκλιες Οδηγίες σχετικά με την εφαρμογή της με Αριθμ. 513551/05.09.2022 (B’ 4763) Κοινής Απόφασης των Υπουργών Οικονομικών και Μετανάστευσης και Ασύλου «Καθορισμός του αρμόδιου οργάνου επιβολής και της διαδικασίας βεβαίωσης του προστίμου του έβδομου εδαφίου της παρ. 1 του άρθρου 23 του ν. 4939/2022 (Α’ 111)», 1 February 2023, 4.



Only 13 out of a total of 34 officials staffing said AAU were responsible for processing ADET renewal applications as of 11 February 2025.<sup>19</sup> More broadly, the Asylum Service has indicated to EU institutions that it “is confronted with numerous staff resignments” affecting its overall capacity.<sup>20</sup>

According to official figures disclosed in response to a parliamentary question, the number of ADET renewal applications pending before the Asylum Service at the end of 2024 was 5,311 i.e. a 32% increase on 4,029 as at 16 February 2024. Nearly 40% of ADET renewal applications were pending for more than six months at the end of last year:



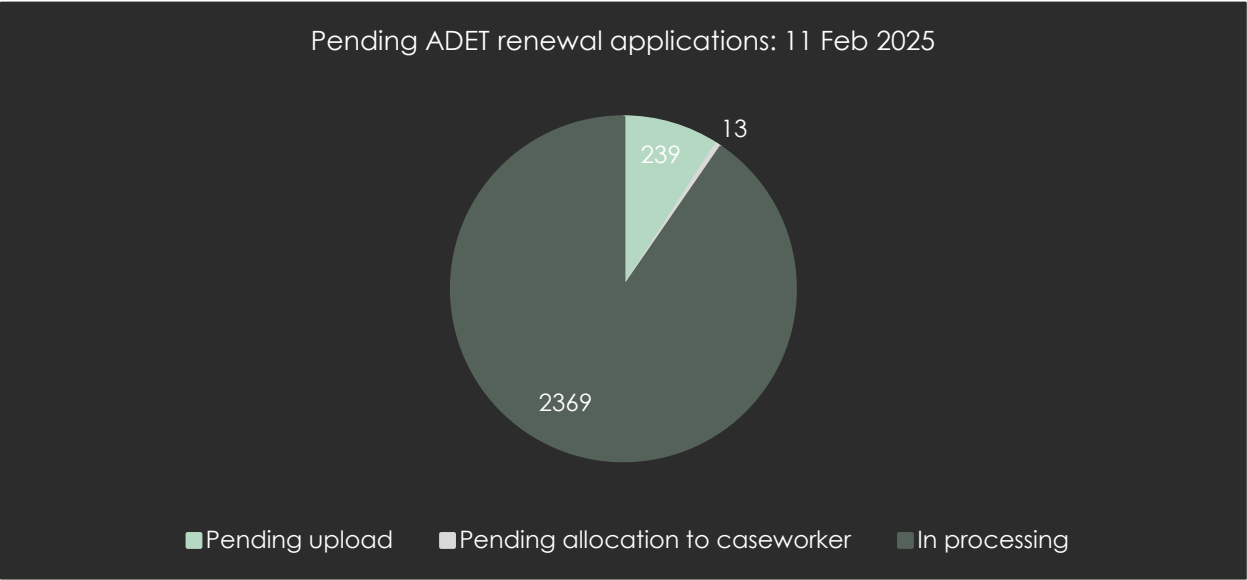
Source: Ministry of Migration and Asylum, Reply to parliamentary question, 10 Mar 2025, [here](#)

According to figures provided by the Asylum Service in a February 2025 email reply to us, the number of ADET renewal applications pending at the AAU Beneficiaries of International Protection has dropped from 4,029 on 16 February 2024 to 2,621 on 11 February 2025.<sup>21</sup> The 2,621 applications at the AAU Beneficiaries of International Protection were pending at the following procedural stages:

<sup>19</sup> Information provided by the Asylum Service, 24 February 2025.

<sup>20</sup> European Commission, Email correspondence: ‘reception and asylum updates’, Ares(2024)7852259, 12 July 2024.

<sup>21</sup> Information provided by the Asylum Service, 24 February 2025; Asylum Service, ‘Ανανέωση Ταυτοποιητικών Εγγράφων Δικαιούχων Διεθνούς Προστασίας’, 58515/2024, 16 February 2024, 2.



Despite commitments made by the Asylum Service towards introducing a special platform for submission of such requests,<sup>22</sup> ADET renewal applications are still filed via email to a dedicated address: [gas.residencepermits@migration.gov.gr](mailto:gas.residencepermits@migration.gov.gr). Beneficiaries do not receive a confirmation – even automated – that their email has reached the AAU Beneficiaries of International Protection and that their ADET renewal application has been registered.

**Delayed registration of renewal applications:** Greek law provides that any document received by a public authority shall be registered on the same day.<sup>23</sup> The Ombudsman has recalled this obligation to the Asylum Service in the specific context of ADET renewal applications.<sup>24</sup> In early 2024, the Asylum Service highlighted that “registration of applications is carried out at the latest within 5 days from the transmission of the application, and 70-80% of the total of applications require additional checks and review”.<sup>25</sup> In cases represented by RSA, however, registration of ADET renewal applications submitted to the AAU Beneficiaries of International Protection significantly exceeds the above time limits. The sole uploading of the renewal application on the “Alkyoni II” database of the Asylum Service may take two weeks or even months in light of the volume of requests managed by the AAU Beneficiaries of International Protection.

**Delays in processing of applications:** The AAU Beneficiaries of International Protection is responsible for issuing an “ADET Renewal Decision” by which it approves the renewal of the ADET. Prior to this decision, the Asylum Service carries out a background check in order to assess whether

<sup>22</sup> Asylum Service, ‘Ανανέωση Ταυτοποιητικών Εγγράφων Δικαιούχων Διεθνούς Προστασίας’, 58515/2024, 16 February 2024, 2.  
<sup>23</sup> Article 12 Code of Administrative Procedure, L 2690/1999, Gov. Gazette A’ 45/09.03.1999.  
<sup>24</sup> Ombudsman, 316047/3924, 24 January 2023; “Έλλειψη ομοιομορφίας μεταξύ των βεβαιώσεων δικαιούχων διεθνούς προστασίας που εκδίδονται από τα κατά τόπους αρμόδια Π.Γ.Α./Α.Κ.Α. Αττικής’, 316047/65864, 2 December 2022.  
<sup>25</sup> Asylum Service, ‘Ανανέωση Ταυτοποιητικών Εγγράφων Δικαιούχων Διεθνούς Προστασίας’, 58515/2024, 16 February 2024, 1.

there are public order or national security grounds which would hinder the renewal of the permit.<sup>26</sup> The background check by the Asylum Service consists in approaching competent police and judicial authorities with a view to verifying whether the person in question has been prosecuted or convicted for offences giving rise to public order or national security grounds.

This stage takes several months in practice,<sup>27</sup> not least due to the fact that it involves "sending of paper files (copies) by post" according to the Asylum Service.<sup>28</sup> However, the Greek administration does not seem to have a consistent explanation of the factors underlying the **Protracted Delays** in the ADET renewal process. As a result, the European Commission has received contradictory information from the different responsible Greek services on the matter:

- ❖ On the one hand, the Asylum Service has "explained the difference between the first issuance of ID documents and the prolongation of residence permits which can be a lengthy process due to lack of staff in the Hellenic Police and rather extensive security assessments."<sup>29</sup>
- ❖ On the other hand, the Hellenic Police has noted that "in relation to the issuance of ADET (residence permits)... there are no delays from their side and is open to a meeting with the Ministry of Migration and Asylum".<sup>30</sup>

In February 2025, the Asylum Service noted that "the time period for replies from the Hellenic Police to [AAU] correspondence concerning recorded prosecutions takes approximately 2 months. In addition, following receipt of replies, further processing of such records may required on the part of our Service e.g. through correspondence with third countries of judicial searches."<sup>31</sup>

## **Second step: appointment at the Hellenic Police & ADET printing**

Only after the issuance of an ADET Decision or an ADET Renewal Decision may beneficiaries of international protection proceed with submitting the necessary documents and giving fingerprints for the purpose of issuing the permit itself.<sup>32</sup> This step is carried out before the territorially competent Passport Office of the Hellenic Police. The Aliens Unit of Attica (*Τμήμα Αλλοδαπών Αττικής*) is the competent office for Attica and responsible for the majority of ADET requests.

Beneficiaries must send an email to the Hellenic Police to request an appointment for the purpose of submitting documents in order to issue their ADET. They may request a single appointment for both the ADET and the **Travel Document**, if they wish. Such an appointment must be requested

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<sup>26</sup> Article 23(2) Asylum Code.

<sup>27</sup> Ombudsman, 'Καθυστερήσεις πλέον του έτους στη διαδικασία ανανέωσης Α.Δ.Ε.Τ. σε υπόθεση δικαιούχου διεθνούς προστασίας', 316047/64653/2022, 28 November 2022.

<sup>28</sup> European Commission, Email correspondence: 'main points discussed in JF with GAS on 21 February 2024', Ares(2024)4013042, 21 February 2024.

<sup>29</sup> European Commission, *18<sup>th</sup> Steering Committee Meeting for Migration Management*, Ares(2024)5820415, 6 June 2024, 2.

<sup>30</sup> European Commission, Email correspondence: 'Flash Report – DDG Gminder, Greece 20-22 November 2023', Ares(2023)8141654, 28 November 2023, 3.

<sup>31</sup> Information provided by the Asylum Service, 24 February 2025.

<sup>32</sup> Article 5(1) ADET Regulation.

within six months of the issuance of the ADET Decision or ADET Renewal Decision, otherwise a new Decision must be taken by the Asylum Service.

For persons accommodated in the Greek reception system, camp authorities schedule group appointments once a given number of persons has been reached and arrange transfer of the persons concerned to the TAA on Tuesdays and Thursdays.<sup>33</sup>

The Hellenic Police has recently stated that it schedules such appointments within a period of approximately 10 days from the submission of the email request.<sup>34</sup> In the cases supported by RSA over the past year, waiting times for appointments for submission of documents to TAA in Attica ranged from one day to 19 days from the submission of the request via email:

Waiting times for appointments to submit documents at TAA in RSA cases			
	Request	Appointment	Days
Khalid*	5 Mar 2025	10 Mar 2025	5
Leyla*	11 Feb 2025	12 Feb 2025	1
Khadija*	4 Feb 2025	7 Feb 2025	3
Hani*	30 Jan 2025	3 Feb 2025	4
Ahmed*	28 Jan 2025	29 Jan 2025	1
Mohammed*	24 Jan 2025	27 Jan 2025	3
Omar*	14 Jan 2025	15 Jan 2025	1
Mahmood*	28 Nov 2024	3 Dec 2024	5
Mehmet*	20 Sep 2024	4 Oct 2024	14
Mehmet*	9 Sep 2024	20 Sep 2024	11
Mehmet*	21 Aug 2024	9 Sep 2024	19
Abbas*	7 Aug 2024	26 Aug 2024	19

Appointments at TAA are scheduled every day at 7am for all beneficiaries. If people are not on the premises on time, they are not allowed in and are required to book a new appointment. The Unit offers no interpretation to facilitate contact between police authorities and the persons concerned, nor does it ensure special conditions for vulnerable persons.

On the day of their appointment with the Hellenic Police, the beneficiary is expected to appear in person at the Passport Office and to produce photographs, as well as a solemn declaration in Greek attesting their place of residence. Fingerprints are taken at the Passport Office upon submission of the documents.<sup>35</sup> The ADET Regulation provides that the Hellenic Police shall locate the asylum decision and ADET Decision of their own motion via the “Alkyoni” database.<sup>36</sup> The same is not true for [Travel Documents](#), however.

<sup>33</sup> Hellenic Police, ‘Δικαιούχοι διεθνούς προστασίας – Επιστολή νομικών οργανώσεων’, 1619/24/258242, 11 December 2024, para 1(a).

<sup>34</sup> Hellenic Police, ‘Δικαιούχοι διεθνούς προστασίας – Επιστολή νομικών οργανώσεων’, 1619/24/258242, 11 December 2024, para 1(a).

<sup>35</sup> Article 7 ADET Regulation.

<sup>36</sup> Article 6(1) ADET Regulation.



The beneficiary must also produce a valid International Protection Applicant Card (Δελτίο Αιτούντος Διεθνή Προστασία, DADP) in case of initial ADET issuance or their expired ADET in case of renewal.<sup>37</sup> We have not witnessed recent generalised difficulties in the delivery of DADP that would affect beneficiaries in applying for ADET, as reported in previous years.<sup>38</sup>

After the submission of documents and fingerprinting, the beneficiary receives a confirmation document with a bar code. The territorially competent Passport Office transmits the file to the Passport and Security Documents Directorate (Διεύθυνση Διαβατηρίων και Εγγράφων Ασφαλείας) of the Hellenic Police Headquarters (Αρχηγείο Ελληνικής Αστυνομίας), the central entity responsible for printing the ADET. Printed ADET must then be returned to the relevant Passport Office within 15 days,<sup>39</sup> to be in turn retrieved by an Asylum Service officer and brought to the Asylum Service.<sup>40</sup>

According to official figures, the Hellenic Police Headquarters received 45,891 applications for ADET from 1 January to 30 November 2024. For 45,133 of those cases, the printed ADET was transmitted to the territorially competent Passport Offices within the 15-day deadline set out in domestic law, while the remainder were transmitted thereto within 20 days.<sup>41</sup>

### Third step: ADET collection from the Asylum Service

Upon completion of the Second Stage described above, beneficiaries wait until their ADET is ready for collection from the Asylum Service. They are neither notified when their ADET is printed nor when it is collected from the Hellenic Police by the Asylum Service.

Although regulations expressly provide that the RAO or AAU which issued the ADET Decision is competent for delivering the ADET,<sup>42</sup> the actual collection of residence permits in the Attica region is exclusively done at RAO Attica ("Katehaki"). This arrangement has been put in place "for reasons of synergies of scale" according to the Asylum Service.<sup>43</sup>

Waiting times from the submission of documents to the TAA until the collection of the ADET from the RAO of Attica in cases supported by RSA over the past year consistently exceeded one month and reached two months in some cases:

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<sup>37</sup> *Ibid.*

<sup>38</sup> RSA & Stiftung PRO ASYL, *Beneficiaries of international protection in Greece: Access to documents and socio-economic rights*, March 2024, 12, available [here](#); March 2023, 10-11, available [here](#).

<sup>39</sup> Article 7(8) ADET Regulation.

<sup>40</sup> Article 7(9) ADET Regulation.

<sup>41</sup> Hellenic Police, 'Δικαιούχοι διεθνούς προστασίας – Επιστολή νομικών οργάνωσης', 1619/24/258242, 11 December 2024, para 1(e).

<sup>42</sup> Article 9 ADET Regulation.

<sup>43</sup> Asylum Service, 'Ανανέωση Ταυτοποιητικών Εγγράφων Δικαιούχων Διεθνούς Προστασίας', 58515/2024, 16 February 2024, 2.

Waiting times from submission of documents to ADET collection in RSA cases			
	Submission of documents	Collection	Days
Hani*	3 Feb 2025	31 Mar 2025	56
Mohammed*	27 Jan 2025	31 Mar 2025	63
Mahmood*	3 Dec 2024	28 Jan 2025	56
Kabir* and Soraya*	24 Sep 2024	30 Oct 2024	36
Mustafa*	24 Sep 2024	24 Oct 2024	30
Zabiullah*	13 Aug 2024	18 Sep 2024	36
Jamal*	31 May 2024	19 Jul 2024	49
Amin*	15 May 2024	2 Jul 2024	48

The Asylum Service does not notify people individually of the date of collection of their ADET. At the end of every week, it uploads on its website a list of six-digit case numbers for which ADET are ready for collection on the indicated day. Therefore, beneficiaries have to regularly consult the weekly lists on the website of the Asylum Service until they find an entry corresponding to their individual case number. The weekly list of appointments for delivery of documents at RAO Attica and RAO Thessaloniki is uploaded on webpages titled “*Λίστες Έτοιμών Αδειών Διαμονής*”. However, the same website has a separate webpage titled “*Λίστα ανανεωμένων Αδειών Διαμονής*” where appointments at RAO Attica and RAO Thessaloniki have not been uploaded since autumn 2020 but appointments at RAO Chios are listed. These lists are available only in Greek, English and French.

If people miss their appointment, the Asylum Service does not automatically reschedule an appointment for the collection of the ADET; a new appointment must be booked. Importantly, services at the Info Point of RAO Attica are informed of the date upon which documents were delivered from the TAA but not of the exact date of scheduled delivery to their holders on the weekly lists.

In our experience, even for people represented by a lawyer, the rescheduling of missed appointments and resolution of any issues relating to the delivery of ADET require in-person presence at RAO Attica, as we have never been able to process such requests with that Office via phone or email.

In February 2024, the Asylum Service had indicated that it was “Reviewing the possibility to improve presentation and search of information on ADET and TDV ready for delivery, as well as other means for the rescheduling of missed appointments in cooperation with competent services of the Ministry”.<sup>44</sup> At that time, it had also informed the European Commission that it “is looking into other options than the existing one (publishing weekly lists/ announcements) as some applicants miss/ overlook their appointment.”<sup>45</sup> Over one year later, however, the process for ADET collection remains unchanged.

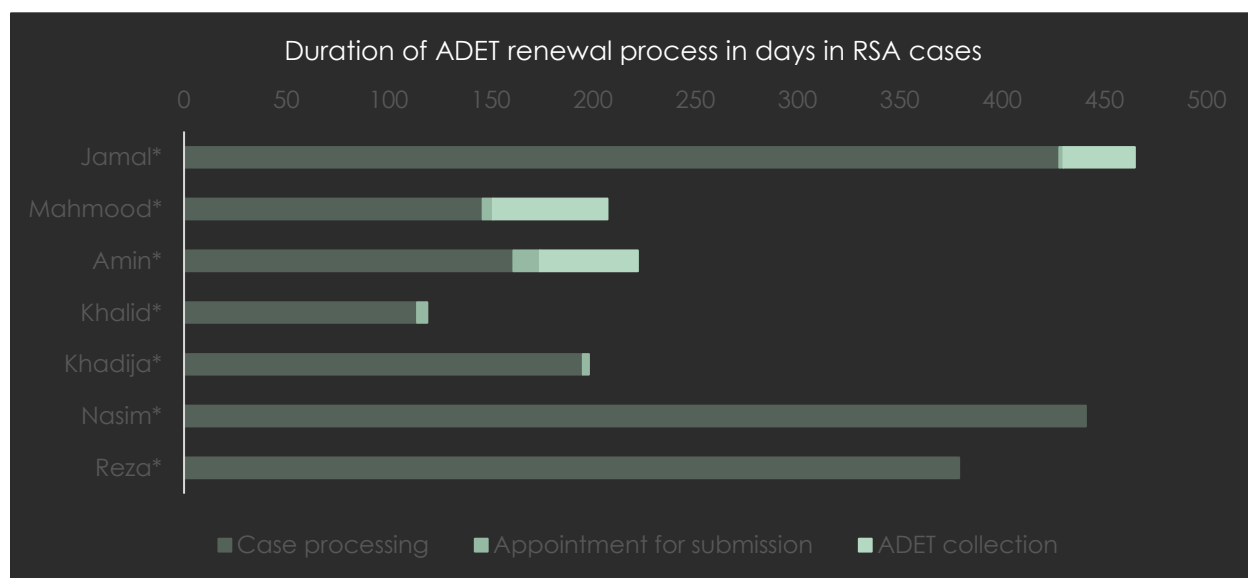
<sup>44</sup> *Ibid*, 3.

<sup>45</sup> European Commission, Email correspondence: ‘main points discussed in JF with GAS on 21 February 2024’, Ares(2024)4013042, 21 February 2024.

## Protracted undocumented periods pending ADET renewal

The above sections demonstrate a series of systemic deficiencies in the various steps of the process for issuing and renewing ADET, the most severe being the protracted delays in the handling of ADET renewal applications by the AAU Beneficiaries of International Protection. These persisting concerns continue to be repeatedly highlighted by independent domestic authorities<sup>46</sup> and EU institutions and agencies,<sup>47</sup> as well as by EU Member State executive and judicial authorities.<sup>48</sup>

Our experience based on cases represented throughout the past year points to disproportionately long waiting times in the ADET renewal process, reaching and even exceeding one year from the submission of the renewal application until the delivery of the new ADET:<sup>49</sup>



<sup>46</sup> Ombudsman, 'Υπενθύμιση αναπάντητου εγγράφου', 355384/54532, 29 October 2024; 'Αδυναμία πρόσβασης δικαιούχων διεθνούς προστασίας στα δικαιώματα τους βάσει των ισχυουσών βεβαιώσεων-Διαδικασία απενεργοποίησης Α.Μ.Κ.Α. σε περίπτωση υποβληθέντος αιτήματος ανανέωσης Α.Δ.Ε.Τ. δικαιούχων διεθνούς προστασίας', 355834/316047/39669/2024, 8 August 2024; 'Καθυστερήσεις πλέον του έτους στη διαδικασία ανανέωσης Α.Δ.Ε.Τ. σε υπόθεση δικαιούχου διεθνούς προστασίας', 316047/64653/2022, 28 November 2022; National Commission for Human Rights, 'Επιστολή της ΕΕΔΑ προς τα συναρμόδια Υπουργεία για το θέμα της ανανέωσης των αδειών διαμονής δικαιούχων διεθνούς προστασίας', 27 July 2021, available [here](#).

<sup>47</sup> European Commission, Email correspondence: 'Mission Report – Acting Director-General Beate Gminder to Greece – 15-16 July 2024', Ares(2024)6952325, 26 July 2024, 3; Letter to the Minister of State, Ares(2023)8268343, 4 December 2023, 10; *Operational conclusions – 12<sup>th</sup> Steering Committee meeting for migration management*, Ares(2023)3222469, 25 April 2023; *Task Force Migration Management Mission Report – Athens/Lesvos/Evros – July 2022*, Ares(2022)5049125; Letter No Ares(2021)8048555, 7 December 2021, available [here](#); EUAA, *Residence permits and travel documents for third-country nationals in the context of asylum*, EUAA/2023/23, November 2023, available [here](#).

<sup>48</sup> Government of the Netherlands, 'Kamerbrief over diverse onderwerpen migratiebeleid', 7 November 2022, available [here](#).

<sup>49</sup> Our observations sharply contrast the view of the Asylum Service that "the waiting time is at the moment 3-4 months": European Commission, *16<sup>th</sup> Steering Committee Meeting for Migration Management*, Ares(2024)7532741, 22 March 2024, 3.

Throughout this protracted period, beneficiaries are neither regularly informed by the Asylum Service of the state of play of their renewal application, nor are requests for information effectively replied. We discuss the responsiveness of the authorities in more detail in the [Information & Assistance](#) section below.

Until they obtain their first ADET, beneficiaries retain their DADP and may renew it at the competent RAO or AAU that granted them asylum if it has expired.<sup>50</sup> However, this does not apply to renewal of an expired ADET, in which case persons receive no documentation upon submission of the application and until the delivery of the new ADET and have no means to demonstrate their status.

*'Dead letter' certificate of asylum status*

According to the ADET Regulation, “Upon request... the competent ADET issuing service issues a certificate of submission of an application and necessary documents for the grant of ADET.”<sup>51</sup> Furthermore, the Asylum Service issues a “certificate of beneficiary of refugee status” or a “certificate of beneficiary of subsidiary protection” upon request to the RAO or AAU which issued the initial ADET Decision; not the AAU Beneficiaries of International Protection where the ADET renewal application is addressed.

However, this certificate in no way substitutes the ADET and has proven wholly ineffective in ensuring refugees’ access to rights while awaiting the renewal of their permit.

First, a certificate of asylum status may not be issued by the Asylum Service before the renewal application has been registered and uploaded by the AAU Beneficiaries of International Protection on the “Alkyoni II” database of the Asylum Service. This often takes weeks or even months, as discussed in the [First Step](#) of the process above.

Second, disparities persist in the contents of certificates issued by the RAO and AAU of the Asylum Service even within the Attica region:

Contents of certificates of asylum status in the Attica region				
Certificate elements	RAO Attica	RAO Piraeus	RAO Alimos	AAU Fast-Track
Date of renewal application submission	√	√	√	√
Date of renewal application registration	x	x	x	√
Duration of validity of certificate	Six months	Six months	Six months	Three months

Third, the certificates no longer mention the beneficiary’s right to access all rights enjoyed prior to the expiry of the ADET. However, even under their previous form and the express mention of access to “the same rights and obligations held prior to the expiry of the ADET”, the certificates

<sup>50</sup> DADP do not indicate that international protection has been granted, however.

<sup>51</sup> Article 13 ADET Regulation.



were never accepted by public authorities and services as proof of asylum status when dealing with people awaiting the renewal of their ADET.<sup>52</sup>

We regrettably note that misleading statements have been made by the Asylum Service in its exchanges with the European Commission, per which the Asylum Service “has started issuing certificates to the applicants while they are waiting for the renewal, which gives them the same legal status as before the application for renewal.”<sup>53</sup> Quite to the contrary, we confirm that no change has occurred in practice in this regard: beneficiaries of international protection holding a certificate of asylum status while awaiting their ADET renewal are not able to access rights and services attached to their protection status.

Here too, the Asylum Service had referred in February 2024 to an impending legislative reform aimed at establishing specific standards for certificates to ensure that personal data and authenticity of the documents can be verified, in line with standards set out in the Migration Code, and that documents are accepted by third parties.<sup>54</sup> Greece has not taken any steps in that direction to date.<sup>55</sup>

In addition to denial of socio-economic rights, these deficiencies restrict the right to legal representation as they effectively prevent beneficiaries of international protection from granting authorisation (εξουσιοδότηση) to a lawyer, since they cannot fulfil the requirement of certification of their signature (θεώρηση του γνησίου της υπογραφής) before a public authority in line with the Code of Administrative Procedure for want of valid documentation.<sup>56</sup>

We highlight that the lack of a valid ADET precludes the possibility to certify one's signature as described above even in the possession of a valid [Travel Document](#), as Citizens Service Centres (Κέντρα Εξυπηρέτησης Πολιτών, KEP) require a valid ADET to provide such a service.

Finally, the Greek Asylum Code provides that the start of validity of the ADET corresponds to the date of issuance of the ADET Decision by the Asylum Service for initial permits and to the date of expiry of the previous ADET for renewals,<sup>57</sup> not to the date of actual delivery of the (new) ADET. This creates a serious risk especially for subsidiary protection holders whose ADET are valid for one

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<sup>52</sup> Ombudsman, 'Ισχύς των βεβαιώσεων δικαιούχων διεθνούς προστασίας εκκρεμούσης της διαδικασίας ανανέωσης αδειών διαμονής αναφορικά με τη πρόσβαση σε δικαιώματα', 316047/66289, 5 December 2022.

<sup>53</sup> European Commission, *18<sup>th</sup> Steering Committee Meeting for Migration Management*, Ares(2024)5820415, 6 June 2024, 2.

<sup>54</sup> Asylum Service, 'Ανανέωση Ταυτοποιητικών Εγγράφων Δικαιούχων Διεθνούς Προστασίας', 58515/2024, 16 February 2024, 2-3.

<sup>55</sup> The Asylum Service has also failed to respond to questions addressed by the Greek Ombudsman on the state of play of the announced changes: Ombudsman, 'Υπενθύμιση αναπάντητου εγγράφου', 355384/54532, 29 October 2024; 'Αδυναμία πρόσβασης δικαιούχων διεθνούς προστασίας στα δικαιώματα τους βάσει των ισχυουσών βεβαιώσεων-Διαδικασία απενεργοποίησης Α.Μ.Κ.Α. σε περίπτωση υποβληθέντος αιτήματος ανανέωσης Α.Δ.Ε.Τ. δικαιούχων διεθνούς προστασίας', 355834/316047/39669/2024, 8 August 2024.

<sup>56</sup> Article 11(1) Code of Administrative Procedure.

<sup>57</sup> Article 23(1) Asylum Code. Note, however, that according to Ministry of Migration and Asylum Circular 68883/2023 the rule only applies to the first renewal.

year,<sup>58</sup> given that they are handed ADET near expiry or already expired and in need of immediate renewal in view of the delays described above. In such cases, beneficiaries are instructed by the Asylum Service to file a new ADET renewal application.

## Recovery of lost or confiscated documents

In the event of loss or theft of an ADET, the beneficiary must report the event to the Hellenic Police and to transmit the copy of the declaration of loss or theft to the RAO or AAU that granted them international protection together with an application for a new ADET.<sup>59</sup> Whereas the ADET Regulation provides that an ADET is automatically considered void from the moment it is declared lost or stolen,<sup>60</sup> the Asylum Service requires in practice a lapse of two months from the declaration of loss or theft before it proceeds to issuing a new ADET Decision. The validity period of the new ADET corresponds to that of the lost or stolen permit.<sup>61</sup>

Conversely, beneficiaries of international protection who have sought asylum in another country and have submitted there their Greek ADET or [Travel Document](#) may be returned to Greece without retrieving said documents. They may also face delays of several months in retrieving them, as the process requires contact with the Greek diplomatic or consular authorities in the country concerned. Our observations made in previous reports remain valid at the time of writing.<sup>62</sup>

**Case study: Farzana\*** and **Parwana\*** are refugees from Afghanistan. The two sisters were returned from Switzerland to Greece in June 2024 while their ADET and travel documents were still valid. Upon arrival at Athens International Airport, Parwana was given back her Greek travel document but not her ADET. Upon contact with the Greek Embassy in Bern in early August, their lawyer was informed that only upon direct inquiry of the Asylum Service may the Embassy proceed to locating the residence permit in question. RAO Piraeus wrote to the Greek Embassy in Bern in mid-August 2024 and received a response in early September, stating that the ADET could not be located.

Drawing on the above observations, we reiterate our view that beneficiaries of international protection in Greece continue to face an array of administrative barriers, a lack of clear and consistent information and slow processing times at the different stages of the ADET issuance and/or renewal procedure. As a result, beneficiaries are liable to face particularly lengthy periods of many months without a valid ADET, in the absence of which they have no access to key rights e.g. social benefits, health care, the labour market. They are equally unable to authorise a legal representative in accordance with the formal requirements set out in domestic law. The Greek authorities have not followed up on their early 2024 commitment to put forward legislative proposals to address these systemic shortcomings.

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<sup>58</sup> Article 23(1) Asylum Code.

<sup>59</sup> Article 11(1) ADET Regulation.

<sup>60</sup> Article 11(2) ADET Regulation.

<sup>61</sup> Article 11(1) ADET Regulation.

<sup>62</sup> RSA & Stiftung PRO ASYL, *Beneficiaries of international protection in Greece: Access to documents and socio-economic rights*, March 2024, 5.

## Travel document (TDV)

The travel document (*titre de voyage*, TDV) is a prerequisite for opening a bank account in Greece, as some banks do not accept ADET as valid identification documents for beneficiaries of international protection who wish to open a bank account. The Greek government has stated in recent exchanges with the European Commission that “is well aware of the structural problems and the difficulties banks face” in relation to beneficiaries of international protection.<sup>63</sup>

### TDV issuance

Beneficiaries of international protection may submit documents and fingerprints to apply for the issuance of travel documents to the Passport Offices of the Hellenic Police,<sup>64</sup> after requesting an appointment with the territorially competent office, similar to the process described in the [Second Step](#) of the ADET issuance. The asylum decision alone suffices for such an application, though an additional condition for requesting an appointment for travel documents is the payment of a fee. Travel documents printed by the TAA are exclusively collected at RAO Attica, similar to the [Third Step](#) of the ADET delivery described above.

According to the Refugee Convention, the Qualification Directive and prospective Qualification Regulation, and the Greek Asylum Code, refugee status holders are entitled to travel documents except where “compelling reasons of national security or public order” arise.<sup>65</sup> Similar conditions apply under EU law to the grant of a [Residence Permit](#) to beneficiaries of international protection.<sup>66</sup> However, the Travel Documents Regulation, adopted based on Article 24 of the Asylum Code, prohibits the grant of travel documents to any person who “a) has been convicted by final decision for forgery, forgery of certificates, embezzlement of documents, false deposition without oath or false declaration (articles 216, 217, 222 and 225 of the Criminal Code and article 22(6) L 1599/1986) where commission is related to the issuance, use, loss or theft of a passport, an identification document or any other document that may be used as a travel document or for criminal organisation, terrorist acts, abduction, slave trade, trafficking in human beings, child abduction, involuntary kidnapping, trafficking (articles 187, 187A, 322, 323, 323A, 324, 327, 351 of the Criminal Code) as well as the offences of Article 29(5), (6) and (7) and of Article 30(1) and (2) of [the Immigration Code]. The prohibition shall apply from the final convicting judgment for five years (5) as regards commission of the above misdemeanours and for ten (10) years as regards commission of a felony respectively, on condition that the sentence imposed has been commuted; b) has been the subject of a criminal charge for a felony or an offence of point (a) for the duration of proceedings...”<sup>67</sup>

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<sup>63</sup> European Commission, *16<sup>th</sup> Steering Committee Meeting for Migration Management*, Ares(2024)7532741, 22 March 2024, 5.

<sup>64</sup> Article 3 Travel Documents Regulation, JMD 10302/2020, Gov. Gazette B' 2036/30.05.2020.

<sup>65</sup> Article 28(1) Refugee Convention; Article 25(1) Qualification Directive; Article 25(1) Qualification Regulation; Article 24(1) Asylum Code.

<sup>66</sup> Article 24(1) Qualification Directive.

<sup>67</sup> Article 1(2) Travel Documents Regulation.

Decisions of RAO and AAU refusing the grant of a travel document may be appealed before the Director of the Asylum Service who takes a decision based on a recommendation of a three-member panel.<sup>68</sup>

The Council of State ruled in July 2024 that Article 1(2) of the Travel Documents Regulation breaches Article 25 of the Qualification Directive and the corollary provision of Article 24 of the Asylum Code insofar as it sets out a blanket prohibition on granting travel document to refugees charged with or convicted of any of the listed offences without prior establishment of compelling reasons of national security or public order.<sup>69</sup> The regulations, however, remain intact at the time of writing.

In practice, the aforementioned provision of the Travel Documents Regulation leads to denials of travel documents to refugees who face charges or convictions with a suspended sentence for misdemeanours such as use of forged travel documents, without “compelling reasons of national security or public order” being established in the individual case. The very same refugees have received ADET from Greece.

## **TDV renewal**

Beneficiaries of international protection wishing to renew their travel document must submit an application form and a digital photograph to the [gas.traveldoc@migration.gov.gr](mailto:gas.traveldoc@migration.gov.gr) email address of the AAU Beneficiaries of International Protection.<sup>70</sup> They are also required to submit a solemn declaration attesting that they have not committed any of the criminal offences listed in Article 1(2) of the Travel Documents Regulation,<sup>71</sup> even though these cases too are subject to a background check by the Asylum Service.

No more than three officials of the AAU Beneficiaries of International Protection were entrusted with the task of processing travel document renewal applications as of 11 February 2025.<sup>72</sup> Accordingly, here too the renewal process is riddled with **Protracted Delays** that seem to even exceed those of the ADET renewal process, according to our experience from cases supported throughout the past year:

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<sup>68</sup> Article 4(3) Travel Document Regulation.

<sup>69</sup> Council of State, 1107/2024, 12 July 2024, para 13. See also Administrative Court of Athens, AΔ1550/2023, 22 December 2023, para 9.

<sup>70</sup> Article 7(2) Travel Documents Regulation.

<sup>71</sup> Article 7(3) Travel Documents Regulation.

<sup>72</sup> Information provided by the Asylum Service, 24 February 2025.



**Case studies: Reza\*** and **Gul\*** are refugees from Afghanistan and parents to four children. The family lodged travel document renewal applications in October 2022. The AAU Beneficiaries of International Protection approved the renewal of Gul's passport in June 2024, 20 months later. Reza's application is still pending at the time of writing, for a period exceeding 29 months.

**Nasim\*** is a Syrian refugee readmitted to Greece from Germany in February 2022. He requested renewal of his travel document in June 2023 and has not received a response from AAU Beneficiaries of International Protection at the time of writing, 20 months later.

According to official figures, the number of TDV renewal applications pending at the Asylum Service at the end of 2024 was 909. Of those, 561 were pending for less than six months, 272 were pending for six to twelve months, and 76 were pending for over a year.<sup>73</sup>

## Tax documentation

### Tax Identification Number (AFM)

The Tax Identification Number (*Αριθμός Φορολογικού Μητρώου*, AFM) is a prerequisite for acts such as opening of a bank account, submission of a tax declaration, rental of property and access to the labour market and social assistance in Greece, including under the [HELIOS](#) programme.

To obtain AFM, people are required to certify their residence address through a copy of a rental contract in their name or a certificate of accommodation (*βεβαίωση φιλοξενίας*) by an authority or a private party. All rental contracts have to be officially declared to the Independent Authority for Public Revenue (*Ανεξάρτητη Αρχή Δημοσίων Εσόδων*, AADE) and uploaded online. Accordingly, beneficiaries of international protection who do not hold an accommodation certificate and/or are homeless are unable to obtain AFM if they have not already obtained it. We stress in this regard that Greek law imposes financial penalties against any person failing to submit or submitting an incorrect declaration of rental of property.<sup>74</sup> In addition, knowing disclosure of false information or concealment of the truth when reporting to any authority is a criminal offence punishable by term of imprisonment under Greek law.<sup>75</sup>

Pursuant to an AADE Decision, asylum seekers completing the lodging of their asylum application automatically receive an AFM upon the delivery of DADP.<sup>76</sup> Asylum registration authorities complete the AFM issuance procedure online and issue an AFM certificate (*Βεβαίωση Απόδοσης ΑΦΜ*) to the applicants.<sup>77</sup> However, upon receiving international protection and obtaining a

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<sup>73</sup> Ministry of Migration and Asylum, Reply to parliamentary question, 43015/2025, 10 March 2025, available [here](#).

<sup>74</sup> Article 5 AADE Decision ΠΟΛ1662/2018, Gov. Gazette B' 3579/22.08.2018.

<sup>75</sup> Article 224(4) Greek Criminal Code, L 4619/2019, Gov. Gazette A' 95/11.06.2019.

<sup>76</sup> Articles 1(3) and 8 AADE Decision A1270/2020, Gov. Gazette B' 5508/14.12.2020.

<sup>77</sup> Article 2(1) AADE Decision A1270/2020.

**Residence Permit**, the documentary details (στοιχεία ταυτοποιητικού εγγράφου) on their records are not automatically updated by the authorities. Beneficiaries of international protection must themselves get an appointment with the competent Tax Office (Διεύθυνση Οικονομικών Υποθέσεων, DOY) in order to update their records. This cannot be done if the ADET has expired.

Furthermore, persons who were not granted AFM as asylum seekers and have already obtained an ADET do not follow the process described above. They are instead referred by the Asylum Service to the DOY. In these cases, individuals need to have a valid DADP or ADET in order to request an AFM.

Importantly, the AFM is automatically deactivated upon the expiry of the **Residence Permit** and cannot be used until the ADET is renewed. This exposes individuals to risks of loss of acquired rights, including labour or unemployment benefits, in light of prolonged delays in the renewal of residence permits as discussed above.

## TAXISnet credentials

Online login credentials (κλειδάριθμος), also known as "TAXISnet" codes, are necessary for transactions with AADE and other public services for key procedures, including submission of tax declarations, activation of unlimited public transport cards and so forth.

Applications for TAXISnet credentials also have to be filed to AADE online, via an appointment with the competent DOY. The AADE platform is only available in Greek. Following the application, the person attends their appointment with the competent DOY to receive their credentials. Activation of the TAXISnet credentials is also done through a platform available only in Greek.

Beneficiaries of international protection who have automatically received AFM upon lodging of their asylum application and have been granted protection status and obtained a **Residence Permit** in the meantime cannot issue TAXISnet credentials unless they have previously updated their documentary details at the Tax Office, as described above.

**Case study: Khalid\***, a refugee from Syria, was returned from Germany to Greece in July 2024, whilst his ADET was still valid. In early November 2024, he requested an online appointment with the DOY in Athens in order to obtain TAXISnet credentials, which he had not received prior to departing from Greece. The DOY requested a copy of his asylum decision, together with his original DADP and his valid ADET, in order for his documentary details to be amended in the Tax Office records, as a prerequisite to issuing him TAXISnet credentials.

## Tax clearance

Tax clearance (εκκαθαριστικό σημείωμα) is obtained after a person makes their tax declaration, usually four months following the end of the reference fiscal year. Therefore, the document cannot be immediately obtained as soon as a person receives international protection. Tax clearance is necessary for opening a bank account and for applying for **Social Welfare**.

## Social Security Number (AMKA)

The Social Security Number (*Αριθμός Μητρώου Κοινωνικής Ασφάλισης*, AMKA) is a single, mandatory number for employment and insurance of all persons under the country's social security system.<sup>78</sup> Possession of an active AMKA is a necessary precondition for engaging in [Employment](#), for exercising a profession, for social security and for registering with the Public Employment Service (*Δημόσια Υπηρεσία Απασχόλησης*, DYP). It is also necessary for obtaining pension and general benefits, as well as [Social Welfare](#). In addition, AMKA is required for transactions with the National Social Security Fund (*Ενιαίος Φορέας Κοινωνικής Ασφάλισης*, e-EFKA) and other insurance funds as well as for various transactions with the public sector, such as issuing a driver's license, an unlimited public transport card, tickets for sports matches, vaccination against COVID-19 etc. Finally, AMKA is necessary precondition for access to the health sector, electronic prescriptions (*άυλη συνταγογράφηση*) and provision of health and hospital care.<sup>79</sup> AMKA is also necessary for access to [Homeless Shelters](#).

### Issuance of AMKA

According to the AMKA Regulation, as of 2025 the Ministry of Migration and Asylum is responsible for granting AMKA to third-country nationals and stateless persons falling within its competence, including beneficiaries of international protection.<sup>80</sup> The regulations thereby exclude KEP and EFKA from the process as far as beneficiaries of international protection are concerned.

However, the Ministry of Migration and Asylum has not yet started issuing AMKA to beneficiaries of international protection, to our knowledge. The Asylum Service noted in February 2025 that "the responsible Informatics Directorate of the [Ministry of Migration and Asylum] has planned technical-level activities with the responsible service of IDIKA for the implementation of Article 1(5)(d) of [the AMKA Regulation]".<sup>81</sup>

**Case study: Khalid\***, a refugee from Syria, was returned from Germany to Greece in July 2024. He has been unable to obtain AMKA for at least seven months since his readmission. In early February 2025, Khalid reached out to the Asylum Service via his legal representative with a request to be granted AMKA. The AAU Fast-Track orally responded that it had no arrangements in place for such a process.

Already throughout 2024, KEP stopped issuing AMKA to beneficiaries of international protection and directed them to the competent branch office of EFKA. Yet, beneficiaries continue to be incorrectly instructed by state authorities to approach the KEP for the purposes of requesting AMKA. This includes both the leaflet notified to people by the Asylum Service upon receiving

<sup>78</sup> Article 153 L 3655/2008, as amended by Article 74 L 4826/2021, Gov. Gazette A' 160/07.09.2021.

<sup>79</sup> AMKA, *Questions and Answers*, available [here](#).

<sup>80</sup> Article 1(5)(d) AMKA Regulation, JMD Φ80320/109864/2023, Gov. Gazette B' 7280/22.12.2023. The provision entered into force on 1 January 2025 according to Article 18 AMKA Regulation.

<sup>81</sup> Information provided by the Asylum Service, 24 February 2025.

international protection, and replies given to individual queries by the Ministry of Migration and Asylum [Helpdesk for Social Integration](#). The Asylum Service also stated in a February 2025 response to an RSA query that “EFKA and the territorially competent KEP can service beneficiaries” vis-à-vis AMKA.<sup>82</sup>

Moreover, EFKA offices engaging with beneficiaries of international protection in 2024 often set arbitrary additional documentary requirements such as a [Travel Document](#) or a family status certificate or birth certificate, even though beneficiaries of international protection are exempted from those requirements by law.<sup>83</sup>

The grant of AMKA is conditioned upon possession of a “valid residence title in the country with labour market access”,<sup>84</sup> namely a [Residence Permit](#). Asylum seekers are not eligible for AMKA but obtain a Provisional Foreigner's Insurance and Health Care Number (*Προσωρινός Αριθμός Ασφάλισης και Υγειονομικής Περίθαλψης Αλλοδαπού*, ΠΑΑΥΠΑ) upon the lodging of their asylum application.<sup>85</sup> This number shall be converted into AMKA within one month of the delivery of the ADET.<sup>86</sup> The conversion does not happen automatically; beneficiaries must request it themselves.<sup>87</sup>

Crucially, the responsible authorities do not proceed to AMKA issuance if the activation conditions are not met, as described below.

## Activation of AMKA

Under the AMKA Regulation, beneficiaries of international protection can only activate their AMKA by producing proof of residence *and* an employment contract or a recruitment certificate uploaded on the Ministry of Labour information system (“ERGANI”), as proof of address.<sup>88</sup> Greek law therefore treats beneficiaries of international protection differently from Greek and EU citizens, to whom the above requirements are set alternatively and not cumulatively. As a result, refugees who have not secured lawful employment are unable to obtain an active AMKA and are thereby completely excluded from health care and social welfare.<sup>89</sup>

The Greek Ombudsman has expressed severe concerns against the policy of the state.<sup>90</sup> For its part, the European Commission has informed civil society organisations that it has repeatedly

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<sup>82</sup> *Ibid.*

<sup>83</sup> Greek Council for Refugees et al., ‘Απόδοση και λειτουργία AMKA και διασφάλιση κοινωνικών δικαιωμάτων δικαιούχων διεθνούς προστασίας’, 358/2024, 15 July 2024.

<sup>84</sup> Article 3(a) AMKA Regulation.

<sup>85</sup> Article 59(2) Asylum Code; Article 1(2) ΠΑΑΥΠΑ Regulation, Gov. Gazette B’ 5392/18.10.2022.

<sup>86</sup> Article 8(1) ΠΑΑΥΠΑ Regulation.

<sup>87</sup> Article 8(2) ΠΑΑΥΠΑ Regulation.

<sup>88</sup> Article 6(5b) AMKA Regulation.

<sup>89</sup> RSA et al., ‘Δικαιούχοι διεθνούς προστασίας’, β/139/24.10.2024, 24 October 2024; Greek Council for Refugees et al., ‘Απόδοση και λειτουργία AMKA και διασφάλιση κοινωνικών δικαιωμάτων δικαιούχων διεθνούς προστασίας’, 358/2024, 15 July 2024.

<sup>90</sup> Greek Ombudsman, ‘Αδυναμία πρόσβασης δικαιούχων διεθνούς προστασίας στα δικαιώματα τους βάσει των ισχυουσών βεβαιώσεων-Διαδικασία απενεργοποίησης Α.Μ.Κ.Α. σε περίπτωση υποβληθέντος αιτήματος ανανέωσης Α.Δ.Ε.Τ. δικαιούχων διεθνούς προστασίας’, 355834/316047/39669/2024, 8 August 2024; ‘Προϋποθέσεις ενεργοποίησης του Αριθμού Μητρώου

raised the issue with the responsible authorities, with a view to addressing the exclusion of beneficiaries of international protection from AMKA and their adverse differential treatment compared to Greek citizens.<sup>91</sup> The Ministry of Migration and Asylum has conceded that legislative reform is necessary to overcome this barrier.<sup>92</sup> Yet, the issue remains unresolved to date and no amendment has been made to the regulations in question.

Given the absolute necessity of an active AMKA for any meaningful exercise of rights attached to international protection status and for engagement with all main branches of the Greek public and private sector, we deem it clear that the prerequisite of an uploaded employment contract or a recruitment certificate on the ERGANI information system for access to AMKA deprives beneficiaries of international protection of their fundamental rights to health care, social support and shelter. Greek law maintains a circular logic whereby access to basic rights as a minimum precondition for integration into the host society and for search of employment is in fact conditioned upon already secured employment. As stated by the Greek Ombudsman, this “runs counter to any sense of integration policy.”<sup>93</sup>

**Case study: Mari\***, an Afghan refugee, is a single mother with a young daughter. Both have suffered serious forms of violence prior to their arrival in Greece. In May 2024, Mari was accompanied by her social worker to an appointment with EFKA in order to activate her AMKA. When she appeared at the EFKA office, however, she was informed that she could not activate her AMKA unless she produced a recruitment certificate or an employment contract. Mari lodged a complaint with the Ombudsman in early July 2024, leading to an intervention before the responsible authorities in the same month. At the time of writing, Mari still has no active AMKA to access services.

Finally, the requirement of a “valid” residence permit for an active AMKA under the AMKA Regulation creates substantial obstacles for people in practice, given that AMKA is deactivated upon interruption of lawful residence in the country. “Specifically as regards deactivation due to non-legal residence in the country, [deactivation] shall automatically take place on the day following the expiry of validity of the residence title, in the absence of renewal, extension or withdrawal of the status of international or temporary protection”.<sup>94</sup> This means that the **Protracted Delays** in ADET renewal inevitably impact on the activation status of AMKA.

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Κοινωνικής Ασφάλισης (AMKA) για τους δικαιούχους διεθνούς προστασίας’, 353419/34964/2024, 12 July 2024.

<sup>91</sup> European Commission, *18<sup>th</sup> Steering Committee Meeting for Migration Management*, Ares(2024)5820415, 6 June 2024; Email correspondence: ‘Meeting with Deputy Minister Voultepsi’, Ares(2024)5589966, 16 May 2024; Meeting Minutes of the Legal Aid Working Group CEAS Sub-Working Group, 11 November 2024.

<sup>92</sup> Greek Ombudsman, ‘Προϋποθέσεις ενεργοποίησης του Αριθμού Μητρώου Κοινωνικής Ασφάλισης (AMKA) για τους δικαιούχους διεθνούς προστασίας’, 353419/59638, 21 November 2024.

<sup>93</sup> Greek Ombudsman, ‘Προϋποθέσεις ενεργοποίησης του Αριθμού Μητρώου Κοινωνικής Ασφάλισης (AMKA) για τους δικαιούχους διεθνούς προστασίας’, 353419/34964/2024, 12 July 2024.

<sup>94</sup> Article 7(2) AMKA Regulation.

## Social welfare

There is no dedicated social benefit for beneficiaries of international protection in Greece to guarantee their transition into the social welfare system in view of their particular circumstances. The financial allowance (“cash assistance”)<sup>95</sup> provided to asylum seekers as part of material reception conditions is automatically ceased as soon as the cash assistance operator is informed of a decision granting international protection is taken, even if it has not yet been notified to the person.<sup>96</sup>

Importantly, the provision of the monthly financial allowance has been mired with delays and repeated interruptions owed to deficient programme and financial management on the part of the Ministry of Migration and Asylum, as described in the [Introduction](#). Whereas at the end of April 2024 the Reception and Identification Service (RIS) “assured that there is no risk of cash interruption” when confronted by European Commission with concerns about delays in disbursement of cash assistance,<sup>97</sup> disbursement of the financial allowance after the April 2024 instalment was suspended for four months for all asylum seekers.<sup>98</sup> Following a belated disbursement of the May and June 2024 instalments, payment of all financial allowances for the months July 2024 and onwards remains fully suspended. In short, no single asylum seeker in Greece has received a financial allowance over the past nine months. Many refugees thereby end up receiving international protection and are expected to become self-sufficient without ever having received financial support during their asylum process.<sup>99</sup>

Whereas Greek nationals can directly apply for social benefits online, third-country nationals and stateless persons, including beneficiaries of international protection, may only apply for benefits through municipal services, namely Community Centres (*Κέντρα Κοινότητας*) or Migration Integration Centres (*Κέντρα Ένταξης Μεταναστών*, KEM) where available.

## Exclusion from most benefits

The lengthy residence requirements underpinning most benefits do not take into account the particular situation of refugees and thereby entail differential treatment against beneficiaries of

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<sup>95</sup> Article 1(h) Greek Asylum Code.

<sup>96</sup> Point D(1)(i) Annex III Ministry of Migration and Asylum Decision 2089/2021, Gov. Gazette B' 31 20/16.07.2021, inserted by Ministry of Migration and Asylum Decision 2857/2021, Gov. Gazette B' 4496/29.09.2021.

<sup>97</sup> European Commission, Email correspondence: 'meeting Secretary General Siarapi on 26 April', Ares(2024)5589853, 29 April 2024.

<sup>98</sup> RSA, 'Suspension of financial assistance to asylum seekers in Greece since May 2024', 1 October 2024, available [here](#). Note that the authorities conceded to the European Commission in September 2024 that “there is no solution” on the interruption: European Commission, *Mission Report: Technical visit to Samos and Athens – September 2024*, Ares(2024)6443981, 11 September 2024, 2.

<sup>99</sup> This is corroborated *inter alia* by European Commission, Email correspondence: 'meeting with RIS on 7 February 2024', Ares(2024)4014126, 7 February 2024.



international protection compared to Greek nationals and effectively exclude them from most forms of social assistance.

- ❖ The housing allowance (*επίδομα στέγασης*) is available to up to 600,000 households living in rented accommodation or paying a mortgage on their main family home.<sup>100</sup> Eligible persons must legally and permanently reside in Greece for a minimum of five years prior to applying for a rental allowance.<sup>101</sup> This condition renders the allowance inaccessible to beneficiaries who obtained status in recent years and/or to those who have not managed to submit tax declarations on time and/or who have not remained in Greece without interruption. Further obstacles arise from the requirement of a valid rental contract for the entire duration of the granting of the benefit.<sup>102</sup>
- ❖ The one-off child-birth allowance (*επίδομα γέννησης*) is available to mothers who are third-country nationals, including beneficiaries, upon condition that they establish twelve years of permanent and uninterrupted residence in Greece, as demonstrated through the submission of tax declarations.<sup>103</sup> Accordingly, the vast majority of status holders are excluded from this benefit.
- ❖ The monthly child support allowance (*επίδομα παιδιού*) – ranging from 28 € to 70 € per child according to income and household size – is expressly available to persons who fulfil 5 years of permanent and uninterrupted residence in Greece, as demonstrated through the submission of tax declarations.<sup>104</sup>
- ❖ Disability benefits are conditioned upon examination by the Disability Accreditation Centre and establishment of over 67% of disability for a person to be eligible for the severe disability allowance.
- ❖ The uninsured retiree benefit, up to a maximum of €360 for an uninsured person aged 67, is available to persons who have had permanent and uninterrupted residence in Greece for fifteen years.<sup>105</sup>

Indirect discrimination against beneficiaries of international protection in respect of access to social benefits therefore constitutes a structural deficiency. This has been highlighted in Letter of Formal Notice INFR(2022)2044 by which the European Commission launched infringement proceedings against Greece in January 2023 for poor implementation of Article 29 of the

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<sup>100</sup> Article 3 L 4472/2017, Gov. Gazette A' 74/19.05.2017.

<sup>101</sup> Article 3(6) L 4472/2017. Residence is established based on the submission of tax declarations within the requisite deadlines: Article 4(3) Housing Allowance Regulation, JMD 71670/2021, Gov. Gazette B' 4500/29.09.2021.

<sup>102</sup> Article 5(1) Housing Allowance Regulation.

<sup>103</sup> Articles 1(2) and 7(1)(e) and (2) L 4659/2020, Gov. Gazette A' 21/3.2.2020.

<sup>104</sup> Article 214(11) L 4512/2012, as amended by Article 15(1) L 4659/2020. The above observations on timely tax declarations are applicable: Article 2(1) Child Support Allowance Regulation, JMD Γ.Π.οικ.Δ22/11/2705/58/2018, Gov. Gazette B' 57/18.01.2018.

<sup>105</sup> Article 93 L 4387/2016, Gov. Gazette A' 85/12.05.2016, as last amended by Article 68 L 4992/2022, Gov. Gazette A' 213/17.11.2022.

Qualification Directive.<sup>106</sup> Earlier documents of the European Commission noted that “[the Ministry of Labour and Social Affairs] is drafting a legislation to change the period needed in order to have access to the social benefits, but they insist that the problem is primarily political and that it cannot be solved.”<sup>107</sup> More than two years after the Letter of Formal Notice, however, Greece has taken no steps to comply with EU law standards.

## Guaranteed minimum income

Contrary to the benefits described above, no minimum residence is required for eligibility for the guaranteed minimum income (*ελάχιστο εγγυημένο εισόδημα*, EEE),<sup>108</sup> a 216 € monthly allowance per household, plus 108 € per additional adult and 54 € per additional child.<sup>109</sup>

Guaranteed minimum income is subject to the cumulative conditions of financial capacity below the poverty line, and lawful, permanent residence in Greece.<sup>110</sup> Families with children also must produce schooling certificates, which include sufficient attendance of the child over the previous academic year.<sup>111</sup>

The EEE Regulation foresees three categories eligible for guaranteed minimum income:<sup>112</sup>

- ❖ Single-person households: persons living alone in a home;
- ❖ Multiple-person households: the total number of people living under the same roof, including hosted persons or families;
- ❖ Homeless persons: persons living on the street or in inadequate dwellings, upon condition that they have been registered by municipal social services or community centres or make use of municipal homeless shelters and women’s shelters. Homelessness must be proven via a municipality certificate and cannot be demonstrated by tax declaration alone.<sup>113</sup>

As highlighted by the Ombudsman, the reference to “households” in the law results in excluding from guaranteed minimum income many persons or families who, owing to a lack of resources, have to move in with a person or household living above the poverty line or are hosted without receiving any form of social welfare, without being members of the same household. That is given that the term “multiple-person household” encompasses all persons living under the same roof. For their part, persons remaining in camps (RIC, CCAC, CTRC) of the Greek reception system are equally excluded from the scope of “household”.<sup>114</sup>

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<sup>106</sup> European Commission, ‘January Infringements package: key decisions’, INF/23/142, 26 January 2023.

<sup>107</sup> European Commission, *Task Force Migration Management Mission Report – Greece – Jan/Feb 2022*, Ares(2022)1024324, 11 February 2022, 5.

<sup>108</sup> Article 235 L 4389/2016, as last amended by Article 177 L 5078/2023, Gov. Gazette A’ 211/20.12.2023. Note also Article 29(2) L 4659/2020.

<sup>109</sup> Article 2(7) EEE Regulation, JMD Δ13/οικ.53923/2021, Gov. Gazette B’ 3359/28.07.2021, as amended by JMD 97046/2023, Gov. Gazette B’ 6456/13.11.2023.

<sup>110</sup> Article 3 EEE Regulation on the exact financial requirements.

<sup>111</sup> Article 4(1) EEE Regulation.

<sup>112</sup> Article 2(1) EEE Regulation.

<sup>113</sup> Articles 2(1)(c) and 7(2) EEE Regulation.

<sup>114</sup> Ombudsman, *Πρότασεις για τα προνοιακά προγράμματα «Ελάχιστο Εγγυημένο Εισόδημα» και «Επίδομα Στέγασης»*, 103/2020, 6 July 2020.

As for “homeless persons”, a homelessness certificate is issued by the Municipality of Athens only to persons living on the streets as identified by Centre for Reception and Solidarity of the Municipality of Athens (Κέντρο Υποδοχής και Αλληλεγγυής Δήμου Αθηναίων, KYADA) staff in the course of their street work. This excludes the homeless living in ‘squats’, living unregistered in camps, moving informally between houses of co-nationals under “extremely bad conditions” in order to avoid the streets,<sup>115</sup> or regularly changing locations along with their belongings for security reasons. In addition, KYADA issues a homelessness certificate only for specific purposes e.g. to apply for social benefits, only as long as all other conditions for access thereto are met. This includes possession of a valid ADET, an AFM and TAXISnet credentials. Therefore, many homeless persons are unable to obtain such a certificate so as to fulfil the conditions for guaranteed minimum income. Finally, KYADA has no interpretation services and cannot communicate with people who do not speak Greek or English.

At the same time, the European Commission highlights that beneficiaries who have received rental subsidies from the HELIOS programme are excluded from guaranteed minimum income.<sup>116</sup> Despite discussions on the matter since 2022,<sup>117</sup> the Ministry of Labour and Social Affairs, now Ministry of Social Cohesion and Family, has not put forward amendments to the law aimed at covering these groups to date.

To apply for guaranteed minimum income, beneficiaries must hold a valid ADET, AFM, TAXISnet credentials, tax clearance, an active AMKA, and a bank account.

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<sup>115</sup> Solomon, ‘Masafarhána: Inside the invisible refugee houses in Athens’, 10 March 2022, available [here](#).

<sup>116</sup> European Commission, *Task Force Migration Management Mission Report – Greece – Jan/Feb 2022*, Ares(2022)1024324, 11 February 2022, 5.

<sup>117</sup> *Ibid.*

# Housing

Greek law provides that beneficiaries of international protection enjoy equal treatment to other legally residing third-country nationals as regards access to housing.<sup>118</sup> However, securing housing remains a critical challenge against the backdrop of the housing crisis affecting the country, with a continuous rise in rent prices and drop of property supply in urban centres such as Athens, Piraeus and Thessaloniki. In Athens, rent prices increased by up to 50% over the past five years.<sup>119</sup> Further repercussions of the shortage in affordable housing are felt *inter alia* in [Homeless Shelters](#) through an inability to free up accommodation places. We recall that eligibility for the [Housing Allowance](#) is subject to a minimum residence requirement of five years and thereby cannot be met by beneficiaries of international protection, as a rule.

These broader challenges are compounded not only by circumstances peculiar to beneficiaries of international protection e.g. language barrier and discrimination in the housing market, but also by the failure of the state to provide people with benefits to support their transition from the asylum process into integration.

## Termination of HELIOS & planning of HELIOS+

The “Hellenic Integration Support for Beneficiaries of International Protection and Beneficiaries of Temporary Protection” (HELIOS) programme officially came to an end on 30 November 2024. The programme, implemented by the International Organisation for Migration (IOM) in partnership with several non-governmental organisations, had already stopped receiving new enrolments and discontinued most essential services as of 1 September 2024.<sup>120</sup>

The new iteration of the programme, HELIOS+, has been formally announced but has not been rolled out at the time of writing. Beneficiaries of international protection who wish to receive integration support are therefore still instructed to await official announcements on the Ministry of Migration and Asylum website regarding the availability of a new programme (see [Information & Assistance](#)).

**Case study: Nasima\*** is a single mother from Afghanistan with two children. After receiving asylum, she sought to enrol on the HELIOS+ programme in early February 2025. Nasima was informed by IOM that “registrations in HELIOS+ have not yet started, but soon they will be able to see its terms and conditions and if possible, apply to join.”

<sup>118</sup> Article 31 Greek Asylum Code.

<sup>119</sup> in.gr, ‘Αττική: Ενοίκια «φωτιά» και τιμές ακινήτων στα ύψη – Ποιες είναι οι πιο οικονομικές περιοχές’, 6 February 2025, available [here](#); To Vima, ‘Ενοίκια: Απλησίαστα τα σπίτια – Νέα εκτόξευση στις τιμές το 2025’, 19 November 2024, available [here](#).

<sup>120</sup> IOM, ‘New announcement’, available [here](#).

Earlier this year, the Ministry released the HELIOS+ award decisions for the implementation of the programme by IOM and partner entities, funded under the European Social Fund + 2021-2027 for the period 2025-2028 as follows:

Funding & target population under HELIOS+ award decisions per region: 1 Jan 2025 – 30 Jun 2028			
	Total target (persons)	Total sum (million)	Decision
Attica	1,650	26.2	30 Dec 2024, <a href="#">here</a>
Central Macedonia	575	10	30 Dec 2024, <a href="#">here</a>
Crete	560	12	30 Dec 2024, <a href="#">here</a>
Western Greece	290	5.1	13 Jan 2025, <a href="#">here</a>
Northern Aegean	280	5.1	17 Jan 2025, <a href="#">here</a>
Southern Aegean	210	3.8	17 Jan 2025, <a href="#">here</a>
Peloponnese	200	2.3	17 Jan 2025, <a href="#">here</a>
Thessaly	150	3.5	13 Jan 2025, <a href="#">here</a>
Western Macedonia	148	2.3	17 Jan 2025, <a href="#">here</a>
Thrace	130	3.6	30 Dec 2024, <a href="#">here</a>
Central Greece	100	1.8	13 Jan 2025, <a href="#">here</a>
Ionian Islands	30	0.6	13 Jan 2025, <a href="#">here</a>
<b>Total</b>	<b>4,323</b>	<b>76.4</b>	

The prospective programme appears to be designed at a dramatically lower scale to the actual needs of the refugee population in Greece. The HELIOS+ award decisions set a total target of 4,323 beneficiaries of international and temporary protection that will benefit from support over the next four-year period – just over 1,000 a year. Greece, however, counts 83,895 active international protection residence permits and 32,572 temporary protection residence permits. Only in the last year alone, international protection was granted to more than 40,000 people, as stated in the [Introduction](#).

In early February 2025, the Ministry of Migration and Asylum announced that the HELIOS+ programme would retain the rule of support to beneficiaries of international protection for a period of up to 12 months, while enrolment is possible for people granted international or temporary protection up to two years prior.<sup>121</sup>

## Evictions from camps into destitution

Material reception conditions made available throughout the asylum process are immediately ceased upon grant of international protection. The deadline given to beneficiaries to vacate their reception places in camps (RIC, CCAC, CTCR) after obtaining a positive decision remains 30

<sup>121</sup> Ministry of Migration and Asylum, 'Νέα εποχή για το εμβληματικό πρόγραμμα "Helios+" του Υπουργείου Μετανάστευσης και Ασύλου', 7 February 2025, available [here](#).

days.<sup>122</sup> The Greek government has still not followed up on commitments previously expressed to EU institutions and civil society to amend the rule.<sup>123</sup>

We reiterate our longstanding concern that the 30-day deadline is not sufficient at all to enable beneficiaries to obtain [Essential Documents](#) such as an ADET, let alone to secure accommodation. We recall that all people navigating the asylum process have arbitrarily been denied their monthly financial allowance for the past nine months.

Refugees face forced departure from camps and continue to end up homeless without means of subsistence, even in particularly vulnerable cases.<sup>124</sup> Forcible departures of refugees from the CCAC on islands such as Leros and Kos are strictly enforced upon expiry of the 30-day deadline even for vulnerable cases, despite the fact that delays in the issuance of ADET are attributable to the authorities.<sup>125</sup> To illustrate, refugees we have represented on Leros have been given fingerprinting appointments for several weeks after their grant of status only to be forcibly evicted from CCAC Leros and to end up homeless and destitute on the island pending completion of the ADET delivery process. A written request from RSA lawyers to CCAC Leros to speed up ADET issuance or to allow refugees to remain in the camp until they obtain their documents was replied by the Head of the RIS ten days later, citing only the provision of the Greek Asylum Code which requires refugees to leave the camp after 30 days.<sup>126</sup>

Beneficiaries of international protection that have left their place in a camp are not allowed to spontaneously enter a camp to receive accommodation. This includes beneficiaries who arrive again in Greece after readmission from another European country.

**Case study: Khalid\***, a refugee from Syria, was returned from Germany to Greece in July 2024. Upon arrival at Athens International Airport, he did not receive any [Information & Assistance](#) from Hellenic Police authorities and was instructed to leave the airport after being briefly detained for identification purposes. Khalid travelled to Corinth and sought to enter CTRC Corinth, where he had previously resided as an asylum seeker prior to leaving in Greece. The security personnel of the camp denied him entry, however.

There are no conclusive or official statistics on homeless persons in Greece, let alone on homeless beneficiaries of international protection in particular. We note that the report prepared by Immigration Policy Lab, ETH Zurich and University College London refers to a sample of 3,755 survey respondents, of whom 3% reported to be homeless. The report mentions that the group of

<sup>122</sup> Article 109(1) Greek Asylum Code.

<sup>123</sup> For instance, European Commission, Letter to the Minister of Migration and Asylum, Ares(2024)1148176, 14 February 2024; *16<sup>th</sup> Steering Committee Meeting for Migration Management*, Ares(2024)7532741, 22 March 2024, 2.

<sup>124</sup> On Samos: European Commission, Email correspondence: 'Updated Samos report', Ares(2024)7041697, 5 August 2024, 2. On Kos: Equal Rights Beyond Borders, *Kos's Unseen Housing Crisis*, November 2024, available [here](#).

<sup>125</sup> RSA et al., 'Δικαιούχοι διεθνούς προστασίας', β/139/24.10.2024, 24 October 2024. Note also Equal Rights Beyond Borders, 'European Court of Human Rights orders to accommodate family with infant and ensure medical care', 25 July 2024, available [here](#).

<sup>126</sup> Reception and Identification Service, 'Αίτηση ΑΔΕΤ & ΤΔΒ – Παραμονή στην ΚΕΔ Λέρου', 28.0, 21 November 2024.



respondents was selected from a “representative sample” drawn from the UNHCR *proGres* database in its November 2021 form. The report also mentions that 96% of the respondents have lived in Greece for more than two years. We note that against the backdrop, these results cannot be applied to the situation of beneficiaries of international protection returning to Greece from other Member States.

## Homeless shelters

The accessibility of homeless shelters to beneficiaries of international protection remains highly restricted by the persisting lack of available places, coupled with onerous formal requirements for entry. Specifically, according to information obtained by RSA via telephone contact with homeless shelters in the Attica region in March 2025:<sup>127</sup>

- ❖ None of the shelters contacted in Athens and Piraeus have available accommodation places and operate waiting lists, most of them long.
- ❖ In addition to valid [Documents](#) requirements e.g. residence permit, AFM, AMKA, medical examinations for skin diseases, chest X-ray and a psychiatric evaluation are a prerequisite for access to all shelters. These in turn require an active [AMKA](#).
- ❖ Knowledge of Greek or English is a prerequisite for access to the shelters.

Furthermore, there is a reported increase in the number of “invisible homeless people” who live in precarious conditions at risk of eviction, in unsuitable dwellings and living conditions,<sup>128</sup> while forced evictions from such locations continue to take place,<sup>129</sup> though reports of such places existing have become scarce in light of successive eviction operations in previous years.

The persisting saturation of homeless shelters has not been mitigated by the “Shelter and Work” (*Στέγαση και Εργασία*) programme run by OPEKA,<sup>130</sup> given that participating persons’ prospects of moving out of homeless shelters are severely undercut by the absence of affordable housing in large cities. The formal documentation requirements for programme, including valid documentation, tax clearance, a certificate of accommodation in a homeless shelter, a social report from the homeless shelter social worker, pose extremely onerous a threshold for entry in the programme.<sup>131</sup>

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<sup>127</sup> RSA contacted: the Multi-Purpose Centre of the Municipality of Athens (*Κέντρο Υποδοχής και Αλληλεγγύης Δήμου Αθηναίων*, KYADA); the EKKA Social Shelter of Kareas; the Doctors of the World dormitory in Athens; the UNESCO Shelter in Kaminia; the UNESCO Shelter in Nikaia; the EKKA Social Shelter in Rentis. The Red Cross Shelter is no longer in operation. Note also that the Greek Ombudsman has recently urged for closure of KYADA due to dire living conditions: Kathimerini, ‘Ποντίκια στο Πολυδύναμο Κέντρο Αστέγων’, 11 March 2025, available [here](#).

<sup>128</sup> European Anti-Poverty Network (EAPN), *Greece: Towards a Systemic Approach to Social Protection*, October 2024, 24, available [here](#); Kathimerini, ‘Η κρυφή αστεγία στην Ελλάδα – «Είναι πολύ δύσκολα αν δεν έχεις δικούς σου ανθρώπους»’, 14 February 2024, available [here](#).

<sup>129</sup> For example, I Efimerida, ‘Λόφος Στρέφη: Εκκενώθηκε κατάληψη σε κτίριο του Δήμου Αθηναίων’, 13 June 2024, available [here](#); CNN Greece, ‘Θεσσαλονίκη: Εκκένωση της κατάληψης «Libertatia» - Τουλάχιστον 19 προσαγωγές’, 25 September 2024, available [here](#).

<sup>130</sup> Article 15 L 4756/2020, Gov. Gazette A’ 235/26.11.2020; JMD 1301/2024, Gov. Gazette B’ 4766/20.08.2024, as amended by JMD 8181/2024, Gov. Gazette B’ 7118/27.12.2024. See further OPEKA, *Πρόγραμμα Στέγαση και Εργασία για αστέγους*, available [here](#).

<sup>131</sup> Article 4 JMD 1301/2024.

We highlight that none of the beneficiaries of international protection we support have entered this programme. There are no official data on the number of people benefitting from said programme, let alone beneficiaries of international protection.

## Employment

Access of beneficiaries of international protection to the labour market requires prior registration with EFKA. Prerequisites for this include a valid [Residence Permit](#), an active [AFM](#) and an active [AMKA](#).

We have limited information on the workings of state-sponsored programmes aimed at facilitating refugees' access to the labour market. IOM runs an internship and vocational training programme for asylum seekers, beneficiaries of international and temporary protection and other legally residing third-country nationals in cooperation with the Ministry of Migration and Asylum under Recovery and Resilience Facility funding. The programme comes to a close at the end of August 2025.<sup>132</sup> Participation in the programme was conditional upon possession of AMKA. There are no known figures or details on the number and status of people who have benefitted from the programme to date. To our understanding, information made publicly available by the Greek authorities on activities under the programme mostly concerns anti-trafficking and firefighting training exercises held in Ministry premises and in camps.<sup>133</sup>

Limited information we hold in relation to employability programmes run by actors other than the Greek state points to substantial delays even for initial appointments:

**Case study: Nisar\***, a refugee from Afghanistan, was returned from Germany to Greece in March 2025 with a valid ADET and travel document. In late March, he contacted the Adama Job Centre run by CRS and UNHCR to request an appointment with an employability officer for the purpose of seeking work. He received a text message response indicating him to expect contact after 1.5 months for a first appointment with an officer, on account of an extensive waiting list.

<sup>132</sup> Greece 2.0, 'Προώθηση της ένταξης του προσφυγικού πληθυσμού στην αγορά εργασίας', available [here](#); IOM, *Προώθηση της ένταξης του προσφυγικού πληθυσμού στην αγορά εργασίας – GRRRF4REF*, available [here](#).

<sup>133</sup> Ministry of Migration and Asylum, 'Αποτελέσματα Διεθνούς Άσκησης «Μέδουσα 2024»: Όλοι μαζί στον αγώνα κατά της εμπορίας ανθρώπων', 22 July 2024, available [here](#); 'Υπουργείο Μετανάστευσης και Ασύλου: Με έφοδο της ΟΠΚΕ και συλλήψεις ολοκληρώθηκε η μεγάλη διεθνής άσκηση κατά της εμπορίας ανθρώπων', 24 May 2024, available [here](#); 'Εκπαίδευση προσφύγων στην αντιμετώπιση των πυρκαγιών: Ρεκόρ συμμετοχής στα Λαγκαδικία', 18 September 2023, available [here](#); Greek Firefighting Service, 'Άσκηση στο υπουργείο Μετανάστευσης και Ασύλου υπό τον επιχειρησιακό συντονισμό του Πυροσβεστικού Σώματος', 1 November 2023, available [here](#).

## Health care

Barriers to accessing AMKA have direct repercussions on access of beneficiaries of international protection to health care in Greece, as they exclude them from any essential treatment that is not considered emergency health care. In addition, persons who have AMKA but are not insured can no longer be prescribed medication or examinations from private doctors.<sup>134</sup>

**Case study:** Farzana\* and Parwana\* are refugees from Afghanistan, returned from Switzerland to Greece in June 2024. Both suffer from extensive physical and mental health conditions. Upon visiting a public hospital in Athens in early November 2024, Farzana was informed that an MRI scan was required in order to ascertain her condition. The hospital noted, however, that the examination could not be prescribed to her since she lacks an active AMKA.

We reiterate our previous observations in relation to severe limitations posed by the language barrier.<sup>135</sup> Appointments in the public health system are scheduled through a telephone line (1535) available only to Greek and English speakers and at a cost. Persons who do not speak these languages therefore have no means of direct access to public health institutions. Furthermore, hospitals in the Attica region continue to face critical gaps in interpretation services to communicate with patients.

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<sup>134</sup> Article 33(1) L 4368/2016, as amended by Article 38(1) L 4865/2021, Gov. Gazette A' 238/04.12.2021. See also Ministry of Health, 'Από την 1η Μαρτίου η συνταγογράφηση στους ανασφάλιστους μόνο από ιατρούς στις δημόσιες δομές υγείας', 27 January 2022, available [here](#).

<sup>135</sup> RSA & Stiftung PRO ASYL, *Beneficiaries of international protection: Access to documents and socio-economic rights*, March 2023, 26.

## Support in accessing rights

The various systemic deficiencies hindering access to rights attached to international protection status are largely owed to legislative and administrative barriers e.g. prohibitive requirements for [AMKA activation](#), insufficient state capacity to process [Residence Permit](#) and [Travel Document](#) renewals, arbitrary exclusion from most forms of [Social Welfare](#). These barriers are directly attributed to the Greek state and are thereby not liable to be overcome by beneficiaries regardless of personal efforts or informal support, including from communities. Nevertheless, inability to access rights is exacerbated by persisting gaps in information and assistance to refugees, as well as by the ineffectiveness of domestic remedies in redressing breaches of relevant rights.

## Information & assistance

### Absence of information upon return to Greece

As a rule, readmission of beneficiaries of international protection from other European countries takes place via Athens International Airport, although recent cases as of 2025 include returns via Thessaloniki Airport. Upon arrival at Athens International Airport, beneficiaries are briefly detained by Hellenic Police authorities for identification purposes and are usually released after a few hours. There are still no interpreters at the airport to facilitate communication of the persons concerned with the Hellenic Police, even for Arabic or Farsi. Upon release, beneficiaries receive no information on housing options or on procedures for access to their rights in Greece.<sup>136</sup>

Over the past year, we have represented returnees mainly from Germany and Switzerland. None of them have been provided with any information document or leaflet written in Greek or any other language upon arrival at Athens International Airport, nor have they been given information on where they should refer e.g. to retrieve or renew [Essential Documents](#). Returnees are also not provided with [Housing](#) or other material assistance upon arrival in Greece. In our experience, they continue to be exposed to homelessness upon return to Greece:

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<sup>136</sup> RSA, 'No support for refugees returned to Greece', 20 March 2025, available [here](#); RSA & Stiftung PRO ASYL, *Beneficiaries of international protection: Access to documents and socio-economic rights*, March 2024, 4.

**Case studies: Zahra\***, a refugee from Afghanistan, was returned from Switzerland to Greece in mid-January 2025 without a valid ADET. Upon arrival at Athens International Airport, she was detained by the Hellenic Police for a couple of hours for identification purposes. No interpretation services were available to facilitate her communication with police officers. Zahra was released and instructed to leave the airport without being given any documentation or information on where she should refer.

**Batur\***, a refugee from Afghanistan, was returned from Germany to Greece in March 2025 without a valid ADET. He left Greece fearing for his safety further to threats and physical attacks against him. Batur has been homeless in Athens since the day of his deportation, over the past week. Batur is sleeping rough on the street together with two other deportees, all sharing one blanket.

**Nisar\***, a refugee from Afghanistan, was returned from Germany to Greece in March 2025 with a valid ADET and travel document. He was escorted by police officers on the plane, along with other deportees, many of them handcuffed by tie wrap. Upon arrival at Athens International Airport, he was detained for a few hours. No interpretation was available to facilitate communication with the police officer present. The police officer subsequently handed Nisar his ADET and travel document and was told to leave the airport, without any further information or documentation.

**Satar\***, a man from Afghanistan, received subsidiary protection in Greece. He was returned from Germany in July 2024. Upon arrival at Athens International Airport, he was briefly detained and then released without any explanation on how to renew his expired documents.

We recall that some returnees who may have received asylum in Greece several years ago, prior to the establishment of certain Offices and Units of the Asylum Service, may encounter further obstacles owed to ambiguities as to the competent RAO or AAU to which they should refer.

In the particular case of Germany, as of recently, more than 2,000 refugees previously granted international protection in Greece receive a letter from the Federal Office for Migration and Refugees (BAMF),<sup>137</sup> stating: “German and Greek authorities cooperate with the International Organization for Migration to facilitate starting a new life in Greece. You will enjoy pickup from the airport and transfer to your new accommodation centre after arrival in Greece. You will be offered room and full board there. The staff will offer you comprehensive counselling to find out how you can successfully manage your new start in Greece – including language courses or assistance with finding your way on the job market. You will receive advise on how to apply for applicable government benefits and how to find a permanent residence. You will be eligible to stay in the temporary accommodation for 4 months. During this period, you will participate in the government integration programme Helios+, which is also implemented by IOM...” The letter is signed: “Your Helios+ support team”.<sup>138</sup>

The BAMF letter contains a link directing to a webpage of the BSCW-ITZBund-Server of the German government, titled “Vote: Questionnaire on eligibility for integration projects in Greece”, without

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<sup>137</sup> German Federal Ministry of Interior, Reply to parliamentary question, 20/15139, 21 March 2025, available [here](#).

<sup>138</sup> The BAMF letter further instructs beneficiaries to fill in a questionnaire and to contact an email address [helios@bamf.bund.de](mailto:helios@bamf.bund.de). For more information, Der Spiegel, ‘Deutschland will Rückkehr von Flüchtlingen nach Griechenland fördern’, 7 February 2025, available [here](#).



specifying a particular programme. It also states that persons submitting the questionnaire consent to having their personal data transmitted, processed and saved for the purposes of participation in a support programme in Greece. No information is provided on the data controller, the data protection officer or the recipient of the data collected, as required by EU law.<sup>139</sup>

According to official German data, as of 6 March 2025, the above questionnaire had been completed by 66 people, of whom 34 were found to meet the eligibility requirements of the programme advertised by the BAMF, while one person was returned thereunder.<sup>140</sup> Our experience with access to the programme in question thus far has been as follows:

**Case studies: Francis\*** is a refugee returned from Germany to Greece in early January 2025. Upon arrival at Athens International Airport, he received neither information nor assistance from the Greek authorities with a view to accessing rights such as accommodation. Francis emailed the [helios@bamf.bund.de](mailto:helios@bamf.bund.de) address via his lawyer, requesting more information on its advertised support programme. The BAMF replied to his legal representative as follows: "For a participation in the support programme it is necessary that we first check, whether the requirements for participating are met. Therefore, we request you to forward the following link to a questionnaire to your client... Please be aware that the completed questionnaire should be sent back in a timely manner for being able to check the eligibility of your client." The BAMF added that "When the relevant questionnaire has been completed and if the person meets the relevant requirements, she/he can take part in the support programme in GRC. The requirements for the support programme in GRC are verified by IOM in Greece and the responsible Greek local authorities. If your client is interested in the support programme in Greece, please contact these authorities." Francis subsequently asked to be informed whether the BAMF programme is in fact the HELIOS+ programme implemented by IOM in Greece or concerns a separate programme. In early February 2025, IOM responded, informing Francis that "registrations in HELIOS+ have not yet started".

**Bashir\*** is a refugee from Afghanistan, returned from Germany to Greece in February 2025. Prior to returning from Germany, Bashir filled the questionnaire provided by the BAMF for access to its advertised support programme. He received the following response: "You have completed the "Questionnaire on Eligibility for Integration Projects in Greece". After reviewing your information, we regret to inform you that you do not meet the requirements for participating in the current integration program in Greece."

**Behrooz\*** is a refugee from Iran with acute mental health needs, returned from Germany to Greece in March 2025. Whilst in pre-removal detention in Germany, he applied for participation in the support programme advertised by the BAMF and was told that he met the requirements for entry and that arrangements would be made for his pick-up at the airport and transfer to accommodation. On the day of his arrival, however, Behrooz was briefly detained by Hellenic Police officers for identification purposes and was then released without further information. No representative of IOM or other organisations was present at the airport to collect him. Upon contact of his legal representative with IOM on the following day, Behrooz was informed by IOM that the support programme advertised by the BAMF only applies to returns via Thessaloniki Airport and that approval from the Greek Ministry of Migration and Asylum would be required for him to be transported to Northern Greece and into accommodation. Behrooz directly addressed the RIS and received no response, remaining without stable accommodation and essential support. Only two days later was he informed by the Ministry of Migration and Asylum that Greece had not been informed of his arrival by the German authorities. One day later, Behrooz was transferred by the authorities to Serres camp.

<sup>139</sup> Article 13(1) General Data Protection Regulation.

<sup>140</sup> German Federal Ministry of Interior, Reply to parliamentary question, 20/15139, 21 March 2025.

## Limited access to responsible authorities

Contact with authorities responsible for different services remains difficult in practice for those beneficiaries of international protection who do not wield the Greek language. We note, for instance, that appointments with EFKA are booked via a telephone line (1555) available only to Greek or English speakers. The same applies to the telephone line for access to the public health care system (1535).

Moreover, authorities responsible for the lengthy process of [Residence Permit](#) renewal are largely inaccessible even to beneficiaries assisted or represented by a lawyer. Written requests sent by lawyers via email to the AAU Beneficiaries of International Protection receive a reply with a delay of up to two or three months. Phone calls are not answered in most cases.

The Greek Ombudsman seems to encounter similar difficulties in its engagement with the authorities. In December 2022, the Ombudsman requested information from the Asylum Service on measures to ensure that certificates of asylum status ensure beneficiaries' access to their rights on account of [Protracted Delays](#) in the renewal of their ADET.<sup>141</sup> The Asylum Service has still not replied to the query, despite reminders sent in August 2024 and October 2024.<sup>142</sup>

## Helpdesk for social integration

The Ministry of Migration and Asylum operates a "[Help Desk for Social Integration](#)" which may be used by beneficiaries of international protection seeking answers to specific questions on integration-related matters.

Per current experience of cases we represent, however, said Helpdesk does not appear to answer beneficiaries' queries in a way that offers them accurate and effective information and guidance to navigate the different procedures and bureaucratic hurdles described in this report. Recent replies received from the Helpdesk include examples of insufficient and/or misleading information as follows:

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<sup>141</sup> Ombudsman, 'Ισχύς των βεβαιώσεων δικαιούχων διεθνούς προστασίας εκκρεμούσης της διαδικασίας ανανέωσης αδειών διαμονής αναφορικά με τη πρόσβαση σε δικαιώματα', 316047/66289, 5 December 2022.

<sup>142</sup> Ombudsman, 'Υπενθύμιση αναπάντητου εγγράφου', 355384/54532, 29 October 2024; 'Αδυναμία πρόσβασης δικαιούχων διεθνούς προστασίας στα δικαιώματα τους βάσει των ισχυουσών βεβαιώσεων-Διαδικασία απενεργοποίησης Α.Μ.Κ.Α. σε περίπτωση υποβληθέντος αιτήματος ανανέωσης Α.Δ.Ε.Τ. δικαιούχων διεθνούς προστασίας', 355834/316047/39669/2024, 8 August 2024.

**Case studies: Farzana\*** and **Parwana\*** are refugees from Afghanistan. The two sisters were returned from Switzerland to Greece in June 2024. Parwana reached out to the Helpdesk in October 2024, asking where she could convert her PAAΥPA into an AMKA. The Helpdesk replied: "In case you have already received recognition of International Protection, the "ΠΑΑΥΠΑ" is deactivated one month after you receive your Residence Permit. In this case, you need to go at your nearest Citizen Center Office (ΚΕΠ - Κέντρο Εξυπηρέτησης Πολιτών", to ask your "ΠΑΑΥΠΑ" to be converted into "AMKA". The Helpdesk response did not inform Parwana that she would in fact not be allowed to obtain AMKA in a KEP, nor did it specify the legal requirements for AMKA activation.

**Asef\*** and **Asefa\*** are refugees from Afghanistan and parents to four children. The family obtained international protection and applied for ADET. While awaiting the delivery of their ADET, they accessed the Helpdesk in October 2024 to inquire on the steps and requirements for obtaining and activating AMKA. The Helpdesk responded as follows: "WHEN you receive your Residence Permit (ADET) then you will need to visit the KEP or any EFKA branch to convert PAAΥPA into AMKA". The Helpdesk reply again failed to inform the beneficiaries that KEP no longer provide such a service and refrained from instructing them on the legal requirements for activating AMKA.

**Ahmad\*** is a Syrian refugee. After receiving asylum on Leros in early November 2024, he was instructed by CCAC Leros to vacate the premises within one month, even though the appointment for submission of documents and taking of fingerprints for the purpose of issuing his ADET was set no earlier than early December 2024. The beneficiary asked the Helpdesk for information on housing possibilities he could refer to after his required departure from CCAC Leros. The Helpdesk replied as follows: "the HELIOS Housing Programme has come to an end at the moment so any attempt to enrol thereon is not possible from August onwards. However, most likely as of the beginning of next year, its implementation will continue. Upon launch, there will be an official announcement on the Ministry website."

## Migrant Integration Centres (KEM)

Migrant Integration Centres (*Κέντρα Ένταξης Μεταναστών*, KEM) existing in selected municipalities provide services to persons residing within the boundaries of their respective municipalities. The KEM of Athens Municipality, for instance, is not open to people residing in neighbouring municipalities in the Attica region. People residing outside the Athens Municipality may only refer to the respective Community Centres (*Κέντρα Κοινότητας*) of their municipal authorities which are not equipped at all with interpreters and are not specialised in refugee integration matters.

The Attica region has three KEM: Athens, Kallithea and Piraeus.<sup>143</sup> The KEM of Athens offers services only to persons speaking Greek, English, Urdu and Farsi.<sup>144</sup> The KEM of Kallithea is only available to Ukrainian temporary protection holders.<sup>145</sup> The KEM of Piraeus was financially supported under 2014-2020 programming and it is not clear whether its operation continues at the time of writing.<sup>146</sup>

We are not aware of any mobile teams operated by any of the KEM and have not received any such information in the context of our engagement with public services to date. A written request for confirmation on this point was sent on 18 November 2024 to the KEM of Athens Municipality and response is pending at the time of writing.

<sup>143</sup> Ministry of Migration and Asylum, *Κέντρα Ένταξης Μεταναστών*, available [here](#).

<sup>144</sup> Municipality of Athens, *Κέντρο Ένταξης Μεταναστών*, available [here](#).

<sup>145</sup> Municipality of Kallithea, *Κέντρο Κοινότητας με Παράρτημα Κέντρου Ένταξης Μεταναστών*, available [here](#).

<sup>146</sup> Municipality of Piraeus, *Κέντρο Κοινότητας*, available [here](#).

## Legal remedies

Greek law does not foresee a specific remedy to beneficiaries of international protection against instances where their rights are not guaranteed.<sup>147</sup> They may therefore only invoke general rules of administrative law which offer no effective remedy to enforce rights attached to international protection status.

The application for judicial review (*αίτηση ακύρωσης*) before the administrative courts against acts or omissions of the administration is an ineffective remedy requires an individual administrative act or omission (*παράλειψη οφειλόμενης ενέργειας*) by an administrative authority. This would not apply to cases such as access to housing. Moreover, the remedy offers review on points of law and not fact. An application for judicial review does not carry automatic suspensive effect, while interim measures under a suspension request (*αίτηση αναστολής*) are not allowed in cases concerning omissions of state duties. In short, an application for annulment cannot enjoin the Greek administration to provide [Essential Documents](#) or socio-economic rights to a beneficiary of international protection.

For its part, the compensation claim (*αγωγή αποζημίωσης*) against acts or omissions of the state<sup>148</sup> is equally ineffective a remedy, as it only entitles the claimant to financial compensation and not redress with regard to the rights denied. Here too, the claimant cannot apply for interim measures.

Finally, Greek administrative courts face slow processing times and one of the highest backlogs in the EU.<sup>149</sup> In our experience, the adjudication of judicial review applications or compensation claims at first instance may take three to five years respectively.

Accordingly, we maintain the view that there is no effective remedy available to beneficiaries of international protection who have suffered violations of Article 3 ECHR or Article 4 of the Charter stemming from denial of socio-economic rights and extreme material deprivation in Greece. This includes persons returned from other European countries. We are not aware of any court rulings in judicial review or compensation proceedings regarding denial of rights of beneficiaries of international protection.

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<sup>147</sup> With the exception of the administrative appeal before the Director of the Asylum Service for refusals to grant a [Travel Document](#): Article 4(3) Travel Documents Regulation, and the administrative appeal before OPEKA regarding refusals to grant [Guaranteed Minimum Income](#): Article 13 EEE Regulation.

<sup>148</sup> Article 105 Introductory Law to the Civil Code, L 2783/1941.

<sup>149</sup> European Commission, *Rule of Law Report 2024 – Country Chapter Greece*, SWD(2024) 808, 24 July 2024, 8.



<https://rsaegean.org/en/recognised-refugees-in-greece-2025>



**Refugee Support Aegean (RSA)**

Iasona Kalampoka 30  
82131 Chios, Greece  
+30 22711 03721  
[info@rsaegean.org](mailto:info@rsaegean.org)  
<https://rsaegean.org>



**Stiftung PRO ASYL**

P.O. Box 16 06 24  
Frankfurt 60069, Germany  
+49 69 2423150  
[europa@proasyl.de](mailto:europa@proasyl.de)  
<https://proasyl.de>