THE WORK OF HUMANRIGHTS360 SOCIAL INTEGRATION SERVICE

Tackling the chain barriers to integration & registering the "undocumented" persons
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INTRODUCTION

One of the main challenges for civil society organizations, which was one of the basic principles upon which HumanRights360 was founded, is to avoid fragmentation as a result of a specific funding mentality. The Social Integration Service is the concrete expression of this vision: a service that is holistic and, above all, open to all: asylum seekers, recognized refugees, undocumented migrants - and, for almost a year and a half, combined with a legal aid program for people in street conditions.

This report is divided into two parts: the first part analyzes the multiple barriers to integration faced by refugees, as reflected in the work of our Service. The second part focuses on more specific issues arising during the provision of services to people without legal documentation. It is the conceptualization of our work in the field of social integration and can be read in addition to our recent report on our work in supporting homeless persons.\(^1\) We hope that this report will be a trigger for structural changes in the direction of a realistic and at the same time a human rights-based policy.

Epaminondas Farmakis  
Founder & Director of HumanRights360

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\(^1\) Street lawyering project completed nine months of supporting homeless people (HumanRights360, 27 April 2021), at https://www.humanrights360.org/street-lawyering-project-completed-nine-months-of-supporting-homeless-people/
In this text, the organization HumanRights360 has collected the main obstacles identified by the Social Integration Service during the provision of its services, from 2018, to asylum seekers and recognized refugees, at the ECHO Hub Athens, in the open accommodation site of Eleonas and in the accommodation site of Skaramangas. In terms of time, this documentation concerns the issues identified during the period 2019-2021, many of which, however, are chronic. Recognizing that the long waiting period for a decision on an asylum application plays an important role in the individual’s integration process, asylum seekers are also included in this report. The aim of this documentation is to provide an overall picture of the challenges faced by this population, to raise awareness of existing policy gaps and of the cascade effects they have on other aspects of their daily lives. In the long run, with this documentation, we aspire to contribute to the public debate with proposals for improving existing integration policies.

The Service’s methodology is reflected in the model entitled Daily Life Integration (DLI), which is based on the occupational therapy model of Polatajko, Townsend and Craig (2007), and the Canadian Model of Occupational Participation and Engagement (CMOP-E).

This model reflects the need for intervention and support, both at the individual level (through life plans and skills improvement / development).
ment) and in the Environments / Contexts that hinder integration (through advocacy and communication strategy). In this way it becomes possible to include integration and coexistence in the daily life of individuals.

1.1. Asylum seekers

According to the HumanRights360 Social Integration Service, the main challenge faced by asylum seekers in Greece in recent years is the abolition of the provision of AMKA in 2019. This abolition and its subsequent replacement by the Provisional Insurance and Health Care Number (PAAYPA), was to play an important role in their access to health care and the labor market, before and throughout the COVID-19 pandemic.

1.1.1. Provisional Insurance and Health Care Number for Third-Country Nationals (PAAYPA)

The Provisional Insurance and Health Care Number for Third-Country Nationals (PAAYPA) was enacted by law 4636/2019, following the abolition of the provision of the Social Security Registration Number (AMKA) to asylum seekers, in 2019. The relevant Ministerial Decision (MD 717/20) was issued 6 months after the abolition of the issuance of AMKA, in January 2020. Essentially, however, the PAAYPA began to be granted to asylum seekers 9 months after the abolition of the AMKA issuance (or revocation for those who already had it) in April 2020. In this interval of 9 months there was a vacuum that left this population in limbo without access to health care and work.

MD 717/2020 regulates the conditions and the procedure for the provision of medicines and access to health care services, the labor market, and social security. The PAAYPA number is unique, corresponds to the full registration card number of an asylum seeker and is valid for the entire duration of the examination of his/her request. The main difference between PAAYPA and AMKA is their duration. While

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2 Circulars N. Φ.80320/οικ.31355/Δ18.2084/11-07-19 & Φ.80320/42862/Δ18.2718/01-10-19
3 Circulars N. Φ.80320/οικ.31355/Δ18.2084/11-07-19 & Φ.80320/42862/Δ18.2718/01-10-19
4 PAAYPA provision for asylum seekers put in place’, MAKENONIA, 1 April 2020, https://www.makthes.gr/tithetai-se-efarmogi-i-apodosi-toy-paaypa-gia-270424
AMKA is valid for life, the PAAYPA is deactivated when the asylum application is rejected, accepted, or filed upon resignation. In case of a positive decision on the asylum application, a transfer procedure to an AMKA number is provided.

Two years after the enactment of PAAYPA and 1.5 years after its implementation, some weaknesses have been identified related to the characteristics of this number. The connection of the number to the card of the applicant for international protection and various technical problems hindered the uninterrupted access to work, health care and social security for asylum seekers, making their living extremely difficult, especially in the conditions of the COVID-19 pandemic.

ACCESS TO THE LABOR MARKET

The European Commission, in its Action Plan for Integration and Inclusion for Third-Country Nationals, recommends the removal of barriers to access to the labor market and states that “Empowering both people with a migrant background and host communities to actively engage in the integration process is essential to achieve sustainable and successful integration”. In contrast to this spirit, asylum seekers in Greece gain substantial access to the labor market six months after the completion of the application process for international protection, under Article 53 of Law 4636/19. Therefore, for the first six months as asylum seekers, they do not have the opportunity to work legally, resulting in their dependence exclusively on the provision of material reception conditions by the Ministry of Migration and Asylum and other bodies. This fact, in addition to the financial exclusion and poverty (since financial assistance started 3-4 months after the initial application), leads to the dormancy of asylum seekers. In addition, this restriction makes asylum seekers vulnerable to labor exploitation, in the absence of legal access to work.

Like AMKA, the PAAYPA number is necessary for access to the labor market, it constitutes a requirement for the completion of the necessary documentation and is recorded in the system of “Ergani”. During the transition from AMKA to the use of the PAAYPA number, asylum

seekers faced challenges in retaining their job or in their job research. This is due to the long delays that existed in granting and activating of PAAYPA. The activation process, in several cases handled by HumanRights360, took up to a year.

In addition, the abolition of the AMKA and its replacement with the PAAYPA had a retroactive effect, i.e., it also applied to asylum seekers who had an active asylum application card and AMKA before 01-11-2019. The procedures for this transition were defined in the transitional provisions of MD 717 (Article 13). The cases of the Social Integration Service revealed delays in this process, which resulted in the impossibility of finding a job for this period, as well as the impossibility of renewing the employment contracts.

During the period from the beginning of the pandemic, in March 2020, until the end of June 2021, the protection measures as well as the characteristics of the PAAYPA number, led to problems related to access to the labor market but also to health care as asylum seekers, to a large extent, passed the whole pandemic with inactive PAAYPA. This happened for two reasons. Initially, as mentioned above, the PAYPAA granting process entailed technical difficulties that led to long delays. At the same time, however, the pandemic brought an additional factor that aggravated the already existing difficulties in accessing the labor market. At that time, the Asylum Service had suspended the renewal of the cards of the applicants for international protection and the latter were automatically renewed on the basis of successive Joint Ministerial Decisions. These extensions theoretically protected asylum seekers since they could not renew their cards at the Asylum Service and prevented people from being congested at the relevant services.

However, these extensions were not written on the applicants’ cards or in any system. Since the validity of PAAYPA is linked to the validity of the applicant’s card (except for pregnant women, for whom it is valid for one year), this resulted in the cards seeming to be expired and PAAYPA being deactivated. Subsequently, asylum seekers were practically excluded from the right of access to the labor market and health care, as described in MD 717/20, even if they were formally entitled to them.

In particular, HumanRights360 handled cases where asylum seekers who had already found work were unable to renew their employment contracts because in the Ergani online system the cards were presented as expired even though, according to the JMD, they were in force. This issue has hampered the maintenance of a stable, legal job and an independent living. There were also cases where, due to the lack of access to the Asylum Service for the renewal of the asylum card, the persons could not receive the PAAYPA, even if in theory they had the right to access work, resulting in missed job opportunities.

**HEALTH CARE** | In the same way, the untimely issuance of PAAYPA for asylum seekers who previously had AMKA, as well as the absence of a transitional period for card renewals after the end of June 2021, made several people vulnerable, without documents, which would safeguard their access to medical care. At the same time, the overburdening that existed at the time (and to a large extent continues to exist) in the public health system due to the pandemic, made it almost impossible for them to access any public health structure, even hospital emergency departments or municipal clinics, many of whom had drastically reduced their services.
Challenges with PAAYPA have created barriers to accessing the COVID-19 vaccination platform. In the absence of AMKA and active PAYPAA, it was impossible for asylum seekers living outside the Accommodation Centers (camps) to make an appointment for their vaccination. In theory, this issue could be addressed with the introduction of PAMKA, the Provisional Social Security Number. In practice, even the PAMKA issuance process had several technical difficulties in the first months. As for COVID-19 vaccination operations in accommodation structures, they started 6 months later compared to the general population, on June 3, 2021.

Regarding the PAAYPA number, HumanRights360 has found that the main obstacles are related to the connection of the number with the expiration of the applicant’s card as well as the non-automatic renewal of the PAAYPA along with the asylum seeker’s card during the pandemic. Regarding the first part, it has recently been voted with article 21 of law 4825/2021 to extend the duration of the asylum seeker’s card from 6 to 12 months, at which time the obstacles are expected to be mitigated as the applicants will have more time. Regarding the second part, in case of re-institutionalization of measures to deal with the coronavirus pandemic, it is proposed, in parallel with the automatic renewal of the cards, the automatic renewal of the PAAYPA number so that they do not lose access to the labor market, health care and insurance.

The story of R.,
31, male asylum seeker from Iran.

R., in May 2021, had not received a PAAYPA number, despite being an asylum seeker. Wanting to be vaccinated against COVID-19, he applied for provisional AMKA number (PAMKA), which failed, as he did not receive a response to his request. Two months later, he renewed the asylum seeker’s card, where PAAYPA was indicated. He repeated the attempt to make an appointment for vaccination through pharmacies, but the system did not recognize PAAYPA. Finally, 4 months later, in September 2021, he managed to make a vaccination appointment through KEP.

1.1.2. Cards of Applicants for International Protection (CAIP)

ACCESS TO THE LABOR MARKET | On June 30, 2021, the automatic renewals of the International Protection Applicants’ Cards that took place in the framework of the protection measures against the coronavirus ceased. The Ministry of Migration and Asylum issued a statement according to which asylum seekers could gradually renew the old cards and replace them with new ones. The new cards are expected to have a built-in microprocessor and are associated with a fingerprint.

However, there was no provisional extension of the automatic renewal of the cards of Applicants for International Protection for the duration of the gradual renewal of the cards. Therefore, all asylum seekers seemed - and were - irregular for the period from 30 June until the date for which their card replacement and renewal appointment had been set.

In addition, the procedure provided for in the relevant announcement has not been fully implemented to date. There have been cases where asylum seekers did not receive the scheduled appointment, as during the phone contact with the Asylum Service, the latter asked for additional prerequisites, such as home address, issuance and pending notification of the decision, etc. which were not formally requested in advance. In recent times and following consecutive communications with the local Asylum Offices, the issue seems to have been settled informally, as now the renewals of the cards take place usually after consultation of lawyers or social workers with the Asylum Service directly, or by granting appointments upon request on the online platform, however, non-compliance with the prescribed procedure clearly is to the detriment of applicants who are not supported by a non-profit organization, and therefore do not have the necessary informal information.
In addition to these delays, asylum seekers who have acquired the new cards continue to face obstacles in their daily lives. There have been cases of inability to conclude or renew an employment contract, with the justification that the cards, although indicating their original validity, do not indicate the renewals and no proof of renewal is provided to the applicants. This omission again poses obstacles to maintaining a stable, legal job, but also obstacles to various transactions, which should be done in good faith. Finally, the new type of asylum card does not provide for the possibility of indicating the word "access to work", as provided in MD 717/20. This omission could cast doubt on whether the right of access to the labor market is active and creates additional administrative barriers for asylum seekers. It is noted that according to law 4825/2021 the cards will have a duration of one year instead of the 6 months that were valid until recently.

The story of S.,
26 years old, a male recognized refugee from Sierra Leone.

He started working as a refrigerant in a private company, with his recruitment being called into question due to the long delay in issuing an AMA, due to the inability to schedule an appointment. In the respective service, there was no vacancy for a meeting for a month, with the result that the employer was threatened with a fine by the service, due to the incomplete documents of the beneficiary. Finally, the issue of AMA became possible, a month later, following a meeting with the competent service, when availability was found.
1.1.3. Other bureaucratic obstacles

The lack of uniform treatment of asylum seekers by public services is a phenomenon that is not occurring now for the first time. During the job research process and especially at the recruitment stage, difficulties in issuing the necessary documents such as the Insurance Registration Number (AMA) have been identified. As in other cases, the treatment of applicants is not uniform, it depends on the employees of the service and each department usually asks for additional documents such as the certificate from an employer. Such incidents are an obstacle to the preparation of potential employees and discourage employers, especially those who are unfamiliar with such procedures, and thus further slow down the financial independence of asylum seekers.

This discouragement of employers is further evidenced by the relevant special research conducted by HumanRights360 in collaboration with the research company FocusBari. When asked about business intentions, it is important that half of businesses (49%) say yes to offering work to a refugee /migrant. However, the decision to recruit refugees and migrants is not considered technically / administratively easy. The demanding bureaucratic procedures often act as a deterrent to the recruitment of candidates, despite the recognized benefits. For example, the lack of knowledge of private companies about the challenges faced by asylum seekers and refugees, can lead them to require documents that do not exist, such as passports and certificates of marital status.

11 See the research of HumanRights360 on attitudes of enterprises towards employment of refugees/migrants, at: https://bit.ly/3ECsBVs
**Significance of obstacles from the recruitment of refugees/migrants**

For almost 7 out of 10 businesses, the main problem by far is the need to verify legality, followed by language based communication barriers. To a moderate extent, issues of concern are behavior & culture.

Source: “HumanRights360’s new research on the labour market integration of migrants and refugees” October 2021

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### AVERAGE SCORE

<table>
<thead>
<tr>
<th>Obstacle</th>
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<tr>
<td>Don’t speak Greek well</td>
<td>4,3</td>
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<tr>
<td>Procedures/required documents</td>
<td>3,9</td>
</tr>
<tr>
<td>Possibility to leave/quit</td>
<td>3,9</td>
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<tr>
<td>Whether they will be consistent with everything agreed</td>
<td>3,6</td>
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<td>Relations with other staff</td>
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<tr>
<td>Difficulty in verifying knowledge/experience</td>
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<tr>
<td>Insecurity for their behavior</td>
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<tr>
<td>The wearing of traditional clothing, etc....</td>
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</tr>
<tr>
<td>Muslim religion</td>
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</tr>
</tbody>
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Q.6 Regarding possible obstacles or factors that may discourage an employer from hiring refugees/migrants in their business, tell me whether you agree or disagree with the phrases I will mention to you.
Asylum seekers and recognized refugees, although having access to the labor market, face a variety of problems with the additional services they need, in order to be able to receive their salary and conduct banking transactions. In particular, opening a bank account is an adventure for any interested asylum seeker. The refusal of officials to open accounts for asylum seekers has been noticed, on the grounds that the applicant’s card is not recognized as an identification document. It should be noted that the treatment is not uniform, as different banks or even different branches of the same bank may have different treatment towards the interested parties. This issue, typically, is the responsibility of the banks. The consequences of this issue are suffered by asylum seekers and their potential employers. The consequence of this instability is that in some cases they cannot be hired, while in other cases, they start working, but they cannot receive their earnings or employers are forced to get in a difficult position. It is worth noting that based on the Joint Ministerial Decision 22528/430/2017, the payment of payroll takes place exclusively through a bank account.

BANKS AND THE PANDEMIC | In the midst of the pandemic, as asylum seekers’ cards seemed to have expired, there were incidents where banks “blocked” asylum seekers’ accounts, creating problems at work as they could not receive their salary or complete transactions during the pandemic.
1.2. After recognition

1.2.1. Residence permits

The story of F.,
32, a female asylum seeker from Cameroon.

F. has been supported by our service since the summer of 2021. In August she applied for asylum while being in detention. For the next 6 months she did not have access to the labor market according to the law. When she came to Athens, she had a very small support network and still lives in precarious living conditions. She was informed orally in September by an Asylum Service employee that she had a positive decision on her asylum application, but it had not been served on her until 2 months later. HumanRights360 Social Integration Service took all the necessary steps to inform the Asylum Service and to request an appointment for service as soon as possible. The woman finds herself currently in transition and in deadlock. She does not have access to the labor market and at the same time she has not officially been granted with refugee status in order to take all the necessary steps to ensure her equal participation in the labor market.

The story of L.,
21 years old, a male recognized refugee from Guinea.

In July 2021, L. found a job in a hotel, however his residence permit had expired and he had applied for renewal with the Asylum Service as early as February 2021. The hotel’s human resources service, however, needed a renewed residence permit in order to proceed with recruitment. Therefore, the recruitment was never done.
Bureaucratic obstacles do not cease even after the acquisition of international protection status. Beneficiaries of international protection, i.e., refugees and beneficiaries of subsidiary protection, face long delays in the issuance and renewal of their residence permits. Residence permits (Uniform Residence Permits / ADET) are the documents that certify their status and give them access to their rights in Greece. The delay in the issuance / renewal of ADET has an adverse effect on the employment and social integration of the beneficiaries as it delays the issuance of AMKA and consequently access to work, health care and benefits.

The procedure is as follows: When the request of an applicant for international protection is accepted, at the same time with the positive decision, the decision on ADET is issued and then the beneficiary can proceed to request ADET at the Police Station/ Passport Office. At the same time, as the person is no longer an asylum seeker, he/she is not entitled to renew his/her applicant’s card. The successful issuance of the residence permit is announced on the website of the Ministry of Migration and Asylum with a specific pick-up appointment. However, in cases handled by HumanRights360, beneficiaries wait several months for their residence permit to be issued. A period in which, in essence, they are not only excluded from their rights as refugees, but from their rights in general, since the applicant’s card cannot be renewed. Consequently, they are unable to register in the Ergani system, to make transactions in the banking system, and even to have access to medical care as PAAYPA is deactivated and they are unable to issue an AMKA.

It should be noted that the validity of each permit starts from the date of issuance of the positive decision and not from the date of issuance of the permit. Specifically, the residence permit is valid for 3 years for refugees and 1 year for beneficiaries of subsidiary protection. In the case of a beneficiary of subsidiary protection this means that after many months of waiting without a valid legal document, the person receives a residence permit which will expire in a few months and he/she will have to reapply for a renewal which will be terminated after some time, during which he/she will again be with-
out a document covering him/her in his/her transactions and work. Indicatively, based on oral information which the Social Integration Service received from the Asylum Service, requests for ADET renewal, which had already expired at the beginning of 2021 were examined in October 2021. At the same time, based on article 17 of law 4825/2021, in case the beneficiary makes an overdue request for renewal of his residence permit, he/she will be fined 100 euros.

1.2.2. Housing

The main integration program for beneficiaries of international protection is the Helios program, which is implemented by the International Organization for Migration (IOM). This program does not provide housing directly but, among other things (integration programs, Greek courses), provides support to beneficiaries for their autonomous housing through an allowance for 12 months. Eligible for the program are the beneficiaries of international protection who resided in an official state structure (in an open accommodation structure, Reception and Identification Center (RIC), hotel or apartment under the ESTIA program), at the time of service of the decision on the asylum appli-
cation. That is, refugees who as asylum seekers lived independently in the urban fabric using the financial aid or having found a job, cannot join the Helios program in general and therefore cannot enroll in the relevant Greek language courses. The available data show that from summer 2019 until November 2021, 15,928 beneficiaries of international protection have benefited from the housing allowance of Helios, nationwide. During the same period, more than 68,000 people were recognized as beneficiaries of international protection.

At the same time, HumanRights360’s Social Integration Service has found that finding a home is often a complex affair for beneficiaries of international protection. Beneficiaries of international protection have 30 days to benefit from housing support without being left homeless. This is due to two provisions. First, since March 2020, asylum seekers residing in the accommodation structures of the Ministry of Migration and Asylum have 30 days to leave the structures or apartments, from the day they are served with the positive or negative decision on their asylum application. An extension of two months is foreseen in some vulnerable cases. Secondly, in order to start the support of the beneficiaries of international protection through the rent allowance, they are required to have found a suitable home, to have entered into a contract registered in the TAXISnet application, which will last at least 6 months and to have a Greek bank account other than the one in which they received the financial aid. This means that if they do not manage to find a home during this time, they are in danger of becoming homeless.

15 Article 111 of Law 4674/2020
16 Article 6 of the Joint Ministerial Decision N. 13348/2020
The Helios program itself provides support services through group meetings, brochures and the Helios Apartments site. However, during the search for an apartment at this stage, HumanRights360 has found that in the absence of sufficient knowledge of the Greek language, the beneficiaries are unable to communicate satisfactorily with the apartment owners. In addition, they face discrimination from apartment owners who in some cases do not want to rent to refugees. Finally, in urban areas such as Athens, rents are high, which already makes housing quite difficult for the general population.

Homelessness - or, in other words, precarious housing conditions - in the transition between the two programs can take several months. It is noted that for the recognized refugees there is no possibility of housing in the transitional accommodation structures of the municipalities both due to the absence of interpretation services and due to lack of places. HumanRights360 highlighted this dimension in its action report in support of people in street conditions, noting that 25% of the beneficiaries of the program were recognized refugees. It is becoming clear that the lack of support and exit strategy from the accommodation structures, combined with the lack of alternatives make homelessness inevitable for refugees, whether it is reflected in through temporary / precarious accommodation or overnight in squares and parks of Athens.

The story of A.,
30 years old, a male recognized refugee from Syria.

A. cannot obtain electronic account information (e-banking) in a Greek bank. When he asked why, he received a reply from the bank that it was related to his refugee status. He made a written request which was never answered.

19 Street lawyering project completed nine months of supporting homeless people (HumanRights360, 27 April 2021).
1.2.3. Transactions with banking institutions

In the case of recognized refugees, the problems do not cease as there have been cases where banks do not provide e-banking codes with the justification of refugee status. An additional technical hurdle faced by HumanRights360’s Social Integration Service is the language barrier. In particular, as in any service, the beneficiaries face obstacles in communication, due to the lack of knowledge of the Greek language. In fact, there has been an incident where a Bank employee in order to provide his services required the accompaniment exclusively of an interpreter accredited by a Greek public body (such as the Department of Foreign Languages, Translation and Interpretation of the Ionian University), which is practically impossible to achieve for Persian and Urdu language. Again, these procedural obstacles practically lead to the financial exclusion of this population as it prevents the receipt of their accrued income, the redemption of social benefits such as the Guaranteed Minimum Income and in general the transactions.

1.3. Conclusions

Various factors affect the social integration of asylum seekers and recognized refugees. In summary,

- the inability to issue the necessary legal and administrative documents,
- the risk of homelessness,
- the absence of public programs and the lack of adequate places for learning the Greek language in the structures and the urban areas by civil society organizations,
- the difficulty in accessing long-life professional development or higher education programs,

are some of the key objective difficulties that refugees face.

Administrative barriers to an aspect of the lives of asylum seekers and refugees create a chain reaction, hampering other areas of their daily lives. The chapters that refer to PAAYPA, to the renewal of the asylum seekers’ cards as well as to the issuance and the renewal of the ADET
of the beneficiaries of international protection, describe in a combined way the adverse domino-effects on the other aspects of their social and economic integration in Greek society. These barriers affect not only applicants for international protection/refugees but also other society groups such as their employers and public services who themselves are burdened by the constant search for solutions. A common component of these issues is the lack of coordination of different services, which became even more apparent during the pandemic.

Along with all the issues that have been exposed, the language problem coexists and persists. In every field, in work, in health care and in every daily transaction, the lack of knowledge of the Greek language, the lack of adequate learning programs, as well as the absence of translation and interpretation add obstacles and further complicate the already labyrinthine processes.

In addition, barriers to accessing the labor market, cultural differences, and a lack of connection to the local community affect both employment and the provision of what is needed for a decent standard of living. Finally, the rhetoric against refugees and the phenomena of xenophobia by companies, property owners and society, hinder the peaceful coexistence and integration of this population group.

The integration of migrants and refugees is a big bet for Greek society, as well as for any society hosting refugees and migrants. The economic and social exclusion of any social group disturbs the well-being of the whole and the social cohesion. Furthermore, the condition of the ongoing pandemic has shown how for populations that are already socially vulnerable, small things, of everyday life, can have a multiplier effect on this vulnerability.

At the level of public policy, Greece has twice drafted a national strategy for the integration of third-country nationals and another one is expected with a focus on refugees and asylum seekers. Of course, based on reports from international bodies, Greece is ranked relatively low compared to other European countries. It is characteristic that in the MIPEX index, Greece is ranked below the EU average of the 28 Member States with a score of “Equality on paper”. 20 Also,

in the NIEM monitoring index, Greece has among 14 European countries the lowest score in terms of access to the labor market and housing. It is noted here that these indicators refer to the situation in Greece in 2019, with the situation having deteriorated even further since then.

Ways to alleviate this situation are: Effective coordination of services, ensuring a smooth transition from one regime to another through a strategy linking the waiting period for the asylum decision to the period afterwards, essentially investing in a faster and more successful autonomy of the individual. This is linked to the existence of a National Strategy with indicators, timetables, budget, multi-level governance, community involvement and monitoring of indicators and their effectiveness.

2. REGISTERING THE “UNDOCUMENTED” PERSONS

HumanRights360 has been operating since October 2019, with the support of the European Programme for Integration and Migration (EPIM) and the Network of European Foundations, a pilot program of Community-based Alternatives to Detention in Greece. The program is based on an individualized case management approach by providing holistic support to each individual, both in the field of legal support and in the field of psychosocial support and/or survival support. The main goal of the program is to provide accurate information about the available legal options and to support, encourage and empower the individuals to make meaningful decisions about their life, to be more active in the community, to mobilize, to take action and to know all the possible solutions or risks involved in their case. The program operates under the auspices of the Social Integration Service and with the same model of holistic approach implemented by the service adapted to the specific target group.

TARGET GROUP | The program supports vulnerable individuals and/or individuals without any reasonable prospect of returning to their countries of origin, who do not have valid legal documents to reside in Greece or are unable to renew them and are under administrative detention or at risk of detention. These include Third-Country Nationals (hereinafter referred to as TCNs) whose asylum application has been definitively rejected or is particularly likely to be rejected and who are already in administrative detention or at risk of being found. Furthermore, it supports migrant populations who are unable to renew their residence permits for a variety of reasons, including
pandemic restrictions, bureaucratic malfunctions and so on. The beneficiaries of the program come mainly from Afghanistan, Palestine, The Gambia and Sierra Leone. The majority reside in Greece from 2 to 6 years while 8.6% reside in Greece for over 11 years.

In addition to the TCNs who for the above reasons are under a return process there is a large increase in the number of TCNs who for a long period of time do not have access to the asylum process. That is, they are unable, through no fault of their own, to apply for international protection at the risk of being placed in administrative detention or are already in detention for extended periods of time, even in police stations. For this reason, HumanRights360 has extended this action to this target group as well, in order to prevent their illegal and prolonged detention. This target group also includes asylum seekers who have broken the geographical restriction mainly for health reasons, they have come to Athens, have gone out of procedure with an act of suspension and are in danger of losing their legal status.

**METHODOLOGY** HumanRights360’s contact with this population is done through the provision of services using a Case Management methodology. It has been observed that third-country nationals without legal documents very often face prolonged and complex barriers to accessing basic services, problems that cannot be solved by a one-time interaction. Case management is an integrated service approach designed to support both access to health services and the well-being of people with specific needs and to provide legal advice and assistance that is always tailored to their individual needs. This approach requires prolonged and close work with the recipient of the services, in order to be able to pur-
sue his / her goals through engagement with different service providers. In this context, the methodology was based on individualized and holistic case management and specialized in the following stages:

**CHALLENGES** A large part of the migrant/refugee population is often left without legal documents or deprived of their legal documents, as a result of which they risk being in administrative detention for long periods of time and in unfavorable conditions for various reasons, depending on the group to which they belong. Many persons in administrative detention remain in the Police Stations for many months under completely unsuitable conditions and without access to basic rights despite the multiple convictions of Greece and the relevant reports of the Ombudsman. At the same time, provisions that temporarily suspend the return (or protect against deportation) of a TCN whose return remains impossible remain essentially in disuse (Article 24 of Law 3907/2011, Article 78 A of Law 3386/2005). These provisions have their own issues as they do not constitute a settlement of their legal status, not providing them with even a temporary status, however their non-use and non-amendment shows the intention for the continuation of administrative detention.

The existing policy for third-country nationals without legal documents is based on the general imposition of administrative detention indiscriminately, as a means of discouraging new arrivals in the country. Following the reform of the legislation in 2020, the number of undocumented persons at risk of prolonged detention and / or illegal mass returns has increased significantly both because they do not have access to asylum procedures for a long time and because the

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practice of illegal pushbacks—according to many and reliable testimonies—it is applied indiscriminately in the mainland, while the number of detainees in Detention Centers and Police Stations has gradually increased.  

The lack of access to legalization procedures for residence in the country and the untimely registration of this population, leads to marginalization and makes them vulnerable to blatant violations of their rights. The conjuncture of the pandemic revealed this issue in an even more emphatic way. Furthermore, the acceleration of the procedures, in combination with the new legislation and the impossibility of implementing the returns, will result in this population growing more and more.

According to the proposed EU Pact on Migration and Asylum, the number of people being held at the border is expected to increase dramatically in the face of the fact that across Europe the number of legal returns remains very low. Furthermore, the proposed solution and in particular their transfer to the various European countries that will undertake their return to their country of origin is expected to be

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particularly problematic in implementation and does not ensure their access to all their rights.

That is, this population remains and will remain trapped in Greece to the knowledge of the state, while their return to their country of origin is impossible and at the same time they are unable to live and work legally in Greece. This condition traps them in a life “parallel” to the rest of society, with zero prospects of integration. This phenomenon concerns society as a whole and its probable magnitude requires immediate government action.

The following chapters list the main challenges identified by Human-Rights360’s Social Integration Service, as evidenced by the cases it undertakes under the program of Community-based Alternatives to Detention in Greece.

2.1. No access to legal documents

Depending on the legal status and legal possibilities in the case of each beneficiary of the program, different challenges arise in their access to temporary or permanent legal residence or in their return to any previous legal status.

REJECTED ASYLUM SEEKERS | In particular, many third-country nationals or stateless people may not have met the requirements for international protection status, but they have serious reasons (e.g. health) for which they need to be granted legal residence in the country. Reference to a residence permit for humanitarian reasons was the necessary safeguard for these vulnerable asylum seekers. In particular, based on different Presidential Decrees, as well as based on the provisions of Law 4375/2016, there was the possibility of referring asylum seekers to the competent authorities which issue residence permits for humanitarian reasons. This possibility was essentially the only point of communication between two completely separate systems, migration and asylum, in an effort for people in need of special care and protection to be provided with immediate protection and not to fall into a “limbo” situation.

The existence of permits for humanitarian reasons is based not only on the Geneva Convention on ensuring the Non-Violation of the Principle of Non-refoulement and International Treaties but also on the Returns Directive 2008/115/EC (Article 6 par. 4 thereof) which provides: “Member States may at any moment decide to grant an autonomous residence permit or other authorization offering a right to
stay for compassionate, humanitarian or other reasons to a third-country national staying without legal documents on their territory. In that event no return decision shall be issued. Where a return decision has already been issued, it shall be withdrawn or suspended for the duration of validity of the residence permit or other authorization offering a right to stay."

The permanent abolition of this possibility with the recent legislative changes, essentially excludes the vulnerable rejected asylum seekers (e.g., unaccompanied minors, those suffering from serious health problems, etc.) from the possibility to apply for a residence permit in the country for humanitarian reasons.

The legislative abolition of this residence permit for humanitarian reasons to vulnerable rejected asylum seekers, came with Article 61 of Law 4686/2020, which abolished retroactively from 1-1-2020, the possibility of the Appeals Committees, in cases that an application for international protection of an alien or stateless person was finally rejected and it was probable that the person met the conditions for a residence permit for humanitarian reasons, to refer the case to the competent authorities for the issuance of a residence permit under the Immigration Code. Then, and in accordance with Law 4825/2021, article 72, par. 5, the case f of paragraph 1 of article 19A of law 4251/2014 was completely abolished regarding also for cases of asylum applications that had been submitted and were pending based on the provisions of the articles of P.D. 113/2012 and P.D. 114/2010. At the same time, the possibility of granting a residence permit for humanitarian reasons was abolished in accordance with article 22 of law 4375/2016, which concerned asylum seekers whose application had been submitted by 31.7.2012 at the latest and its examination was still pending at the second instance.

Any attempt to “substitute” the possibility of granting a residence permit for humanitarian reasons to rejected asylum seekers who meet the conditions, with the postponement of removal, which, at least to date, has fallen far short of the necessary protection, as it does not substantially regulate the legal status of this population, while contributing to the further creation of “gray zones”, since the possibility of access even to vital goods is limited and completely doubtful.
At the same time, it is particularly problematic that the competent authorities do not collect official statistics on the frequency of the postponements of removal, the reasons for granting them and the possibility and frequency of their renewal, with the result that it is based on opaque and arbitrary police practices.

CONCLUSIONS The complete abolition of the possibility of granting residence permits for humanitarian reasons to asylum seekers is particularly worrying as it seems to lead to hundreds of people staying in the country without legal documents for long periods, without any access to vital services to meet at least their basic needs, without the possibility to enjoy any protection even for a limited period of time and if they meet the relevant conditions, they remain marginalized and excluded from any concept of social protection, in “gray zones” and under the constant risk of administrative detention for extended periods. Inevitably, the population without legal documents increases, and the police authorities are strengthened, by becoming solely responsible, without the intervention of any other administrative scrutiny, for the implementation of removal, return, readmission, and detention procedures.

MIGRANT POPULATION WITHOUT A RESIDENCE PERMIT Third-country nationals who reside in Greece for a long time but do not currently hold legal documents have, under the Migration and Social Integration Code (Article 19, Law 4251/2014), the possibility to apply under certain conditions for a three-year residence permit for exceptional reasons. This permit is issued if the applicants can prove their 7-year, uninterrupted residence in Greece through a certain list of supporting documents. The process of issuing this permit takes place in the Decentralized Administrations of the country, in the Police Directorates of Foreigners and Migration.

Based on the cases handled by the Organization, the procedure seems to have weaknesses in terms of serving the applicants and protecting them while waiting for the response of the administration.

First, in urban centers it takes long from the expression of a will to submit an application to reach the time of the appointment for submitting the file with the supporting documents. In many cases, an eligible TCN receives an appointment for the submission of supporting documents on a date which in Attica, at least, may have been set for one year later. This is important given that during this period, applicants for this permit do not receive any protection against removal or detention, even if they qualify for this residence permit.

Then, a particularly large volume of documents is required to prove the ties with the country and there are long delays in the issuance of a decision, which makes the contribution of a lawyer to monitor the process necessary. At the same time, throughout the examination of the application, the applicants are partially protected, with a document confirming the receipt of their application, which protects them from removal and detention but does not provide the right to work or to access health care and is not counted as a period of legal residence.\textsuperscript{27}

These weaknesses became more pronounced during the pandemic, especially in urban centers. From the beginning of the first restrictive measures for COVID-19 (March 2020 to 15/04/2021), there was no possibility to submit a request for the grant of this permit to the Attica Departments of Foreigners and Migration. This happened because, due to the restrictive measures for COVID-19, the possibility of submitting an application for more than 1 year was suspended. The consequence of this was the extension of the duration of irregular residence and, consequently, the further exclusion of the TCNs from basic goods and services. From 15 April 2021, the process of submitting supporting documents is done exclusively electronically.\textsuperscript{28}

The above conditions increase the population without legal documents and without prospects in Greece, who are marginalized and do not have access to health care, legal work and basic goods.


2 2. Impact on Health

**HEALTHCARE** The Provisional Insurance and Health Care Number (PAAYPA), is directly linked to Card of the Applicant for International Protection, so it is deactivated upon the latter’s expiration or cessation of validity with only exceptions for pregnant women, in which case the PAAYPA is valid for 1 year and the minors, for whom with a recent legislative change (Article 19 of Law 4825/2021) it is provided they will keep PAAYPA until they reach adulthood or until the execution of a return decision. In the absence of an active PAAYPA or AMKA, this population does not have access to healthcare (medical examinations, medicines, etc.) except for the Emergency Departments of the hospitals on duty. At the same time, the overburdening that existed at the time (and to a large extent continues to exist) in the public health system due to the pandemic, made it virtually impossible for them to access any public health structure, even hospital Emergency Departments or municipal clinics, many of whom had drastically reduced their services. There is an exception of a few cases of people who used to have AMKA as asylum seekers and continue to use it.

The story of A.,
32, a female rejected asylum seeker from Cameroon.

A had fallen ill and had breast surgery as an asylum seeker in 2017. In 2020, her asylum application was rejected. Since then, she has been unable to monitor the course of her health, as she should have done under the instructions of her treating physician for her postoperative course.

In particular, those who are in Administrative Detention, especially those who are being held in police stations, have extremely limited access to health services and only emergencies are transferred to hospital Emergency Departments. Most Pre-Removal Detention Centers (PRDC) have fewer medical staff in relation to the number of detainees. In practice, the limited presence of psychiatrists or the lack of interpretation has also been noted in Athens. The above conclusions have emerged from the cases of HumanRights360 and the inability of the beneficiaries to be served by the health services provided by PRDCs, are reinforced by the data presented by the Ministry
of Citizen Protection for the first half of 2021, in the framework of the parliamentary control. Indicatively, in PRDC Amygdaleza, 600 detainees are served by 2 doctors, 2 nurses and 1 health visitor, while there is no psychiatrist. At the same time, children without legal documents do not have access to examinations / vaccines (only at the Emergency Department of the Children’s Hospital).

Finally, victims of violence, torture, trafficking in human beings, and those suffering from chronic mental health issues face difficulties in both accessing and obtaining a certificate from public hospitals, as Emergency Departments provide them only in extremely emergency mental health situations. However, in cases where it is necessary to submit a request to the competent authorities for the lifting of a pending geographical restriction on an island, only the submission of a medical opinion by a Public Hospital can be considered decisive for the progress of the request.

As can be seen from the above, there are people in detention centers but also in the urban fabric, people with chronic health problems who do not have access to medicines and medical examinations. Their condition worsens, and only when they are considered as emergencies can they visit the Emergency Departments of the Hospitals.

**COVID-19** As can be seen from the previous chapter, undocumented TCNs become even more vulnerable to coronavirus as they do not have access to healthcare. In addition, they do not have the same capabilities to comply with protection measures and live in precarious conditions.

Law 4636/2019, which entered into force on January 1, 2020, just a few months before the outbreak of the pandemic in Greece, generally introduced the widespread imposition of administrative detention for long periods of asylum seekers, even for vulnerable people. In addition, Law 4686/2020, which entered into force a few months later, provided that, in the case of persons detained on return, administrative detention would be the rule and alternatives to detention could be applied only exceptionally and under restrictive conditions. In Greece, no measures have been implemented to reduce the deten-

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tion of migrants, in the context of the COVID-19 pandemic. Although the Greek authorities took measures early enough and in a horizontal manner to limit the spread of COVID-19, they did not take any official measures to decongest the detention centers and police stations, despite the fact that these centers were overcrowded.

In April 2020, just as the COVID-19 pandemic had broken out, the Committee for the Prevention of Torture of the Council of Europe urged authorities to resort to alternatives to deprivation of liberty, which is imperative in situations of overcrowding and even more so in cases of emergency. In addition, the authorities should refrain, as far as possible, from detaining migrants. In Greece, and regarding the deported TCNs detained in PRDCs and the police stations, although there were calls from the Civil Society for the decongestion of these structures, the competent ministries did not respond. The size of the population in administrative detention as well as the level of their health immunity is also documented by relevant statistics presented at that time by the Ministry of Civil Protection in the context of the Parliamentary Control.

<table>
<thead>
<tr>
<th>PRDC</th>
<th>Number of detainees</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amigdaleza</td>
<td>600</td>
</tr>
<tr>
<td>Tauros</td>
<td>145</td>
</tr>
<tr>
<td>Corinth</td>
<td>779</td>
</tr>
<tr>
<td>Drama (Paranesti)</td>
<td>323</td>
</tr>
<tr>
<td>Xanthi</td>
<td>196</td>
</tr>
<tr>
<td>Orestiada (Filakio)</td>
<td>195</td>
</tr>
<tr>
<td>Lesvos</td>
<td>Suspension of operation due to damage</td>
</tr>
<tr>
<td>Kos</td>
<td>154</td>
</tr>
</tbody>
</table>


31 See Joint statement of organizations HumanRights360, Velos Youth and Babel with Protocol Number 96-07.04.2020

### Table: Number of Detainees per PRDC

<table>
<thead>
<tr>
<th>PRDC</th>
<th>Number of Detainees</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amygdaleza</td>
<td>206</td>
</tr>
<tr>
<td>Tauros</td>
<td>26</td>
</tr>
<tr>
<td>Corinth</td>
<td>358</td>
</tr>
<tr>
<td>Drama (Paranesti)</td>
<td>323</td>
</tr>
<tr>
<td>Xanthi</td>
<td>196</td>
</tr>
<tr>
<td>Orestiada (Filakio)</td>
<td>0</td>
</tr>
<tr>
<td>Lesbos</td>
<td>Suspension of operation due to damage</td>
</tr>
<tr>
<td>Kos</td>
<td>0</td>
</tr>
</tbody>
</table>

In these circumstances, where the protection of vulnerable populations is essential for public health, the vaccination of TCN without legal documents was made possible with a delay compared to the general population. Vaccination of the general population began in December 2020, and access to the Covid-19 vaccine and self-tests required AMKA or PAAYPA. In April 2021, Law 4796/2021 provided for the possibility of issuing a Provisional AMKA (PAMKA) for the purpose of vaccination, regardless of the legality of residence of the citizen concerned. In practice, this means that if a TCN has identification documents, he/she can issue a PAMKA and then set an appointment for his/her vaccination. In September 2021, Law 4839/21 added provisions for the protection of TCN from expulsion during the vaccination process against COVID-19 as well as additional provisions to facilitate the vaccination of populations in motion, such as the land workers. Indicatively, the provisional AMKA can be issued by the social services, the Community Centers and the Migrant Integration Centers of the Local Authorities (OTA) of the first degree, without the requirement of personal presence of the interested parties, the Vaccination Certificate can be issued by Citizens’ Service Centers (K.E.P.), the social services, the Community Centers and the Migrant Integration Centers of the local authorities of the first degree, the Reception and Identification Service of the Ministry of Migration and Asylum, the PRDCs., the Detention Centers of the Ministry of Citizen Protection, as well as other administrative structures of the General Govern-
Moreover, in the National Vaccination Program against COVID-19, Municipalities-through their Municipal Clinics- and non-governmental organizations are finally included. These provisions presuppose the issuance of 3 Joint Ministerial Decisions for the specialization of the procedures. On November 12, 2021, the first JMD was issued which provides for the issuance of PAMKA by the administrative structures of the General Government.

MENTAL HEALTH | There is also a serious negative impact on mental health as the constant risk of arrest leads to increased stress, insecurity, despair, and depression. In general, especially people without legal documents and given the lack of access to vital services, often face issues of a psychological / psychiatric nature.

Most of the beneficiaries who are enrolled in the “Community-based Alternatives to Detention in Greece“ program and have sought psychological support face significant challenges in addressing mental health issues. Depression, anxiety, and substance abuse are among the most common problems. Depressive symptoms and disorders are common in almost 80% of the beneficiaries who sought psychological support.

The story of L.,
21-year-old male, rejected asylum seeker by Sierra Leone, with severe symptoms of mental disorders

L., 21 years old, rejected applicant for international protection by Sierra Leone, with severe symptoms of mental disorders needs a psychiatric evaluation, according to the psychologist who is monitoring him. Due to non-possession of PAAYPA / AMKA, the planning of the visit and evaluation was impossible to be set, as well as the finding of another body. After almost 2 months, L.’s clinical picture deteriorated to the point that he had to be referred to the emergency hospital department for immediate care and treatment. The clinical picture and the burden of L. could have been milder, with the appropriate and timely access.

cal support, while anxiety disorders are also common. Many of the beneficiaries who receive psychological support report some form of substance abuse (most often alcohol and cannabis).

Feelings of isolation, hopelessness, widespread sadness, and insecurity about the future are among the most commonly reported feelings. In the vast majority of cases, there is withdrawal from various social activities due to the constant fear of detention and almost complete collapse of the support system. In addition, a worrying number of these beneficiaries have reported suicidal ideation, while some have a history of recent suicide attempts. Most of the beneficiaries reported that they experienced stronger clinical symptoms immediately after the loss of the status of asylum seeker, which underlines the importance of ongoing psychological and psychiatric support for this group. Even more serious mental health conditions, such as brief psychotic episodes or complete psychotic symptoms, occurred in some beneficiaries during the same period.

Due to the legal status of these individuals, referrals for ongoing psychiatric support can be very problematic, as most beneficiaries have lost access to the National Health System (except in emergencies). Beneficiaries who require ongoing psychological and psychiatric support and do not have valid documents are usually referred to various
Non-Governmental Organizations for psychiatric assessment and support, but even there, occasional problems arise due to the lack of the required residence documents. An additional challenge for these beneficiaries is the fact that due to the limited numbers of psychiatrists within these organizations there are long waiting periods.

In addition, obtaining the necessary psychiatric medication can also be difficult, as even Social Pharmacies in Greece require documents for the provision of drugs. Psychiatrists in many cases (especially for beneficiaries without AMKA) are unable to prescribe medication and most of these beneficiaries are referred to medical NGOs, which also occasionally face challenges in finding strictly regulated psychiatric medication (psychiatric medication under Law 1729/1987).

2.3. Impact at employment

Access to the legal labor market is another puzzled situation for TCNs without legal documents who, in the absence of another option, remain in Greece. So far there have been 2 provisions that would potentially address the issue to some extent, which however have not been implemented or have been repealed.

Pursuant to Article 37 of Law 3907/2011, third-country nationals who are subject to postponement of removal and the authorities cannot ensure that their livelihood needs are met, may be employed in certain sectors of employment and areas of the country, based on a relevant JMD. The JMD was issued in 2015 (JMD 53619/735 / 25-11-2015), which however has not been activated.

In addition, since 2016, Article 13a was added to Law 4251/2014, under which third-country nationals without legal documents may exceptionally work in the agricultural sector. This provision had many problematic features and the few times it was applied in practice created many problems in this population, most importantly the dependence it created on the “employer”, resulting in frequent phenomena of labor exploitation or even labor trafficking. Nevertheless, its abolition with article 72 of law 4825/2021 without being replaced by another improved provision for work in the agricultural sector clearly highlights the government’s policy of complete exclusion and ending up in poverty to the population without legal documents.
Therefore, there is no provision for access to the labor market with regards to TCNs without legal documents. Thus, their living needs are met through irregular work, i.e. work in the informal economy, in food, in cleaning, as in-house helpers, farm workers and so on. Working under these conditions, apart from the fact that it means missing state profits from the avoidance of tax and insurance contributions, means working without any safeguards for labor rights. In combination with the precarious residence of these people in Greece, this condition endangers or even creates the conditions that give rise to the occurrence of cases of labor exploitation and forced labor.

BASIC NEEDS | At the same time, the coverage of basic needs through social programs is equally impossible as the access of TCNs without legal documents to housing programs or their access to social benefits is not provided. This inevitably leads this population to a situation that falls into the spectrum of homelessness, i.e. either in street conditions, or in apartments with many other compatriots, or in the informal residence in state accommodation structures for asylum seekers, as “unregistered”.34

2.4. Conclusions-Suggestions

The image formed through the cases handled by HumanRights360 is that of the vicious circle. The notion that those rejected by the asylum process will “simply” be returned leads to the adoption of policies that lead to a stalemate. This impasse stems from the fact that these people continue to live without legal documents in Greece and in the EU in general. It is worth noting here that this is not an exclusively Greek phenomenon. Across Europe, it seems impossible for 300,000 people to return each year, according to EU estimates.35 There are also numerous examples of European countries providing some form of humanitarian protection for rejected asylum seekers.36 At the same

36 OSCE-ODIHR, ‘Regularization of Migrants in an Irregular Situation in the OSCE
time, the provisions of the proposed Pact on Migration and Asylum provide for an increase in administrative detention and returns without regulating, even temporarily, the status of persons without legal status or legal documents.

It is clear that the lack of legalization channels combined with the impossibility of returning this population to their country of origin, lead a population to a permanent limbo state where every next step involves unknown risks. Failure to register them by any body, makes it impossible to measure the population and design appropriate policies. Based on the above conclusions, the ways that could alleviate this situation are the following:

- The wider and more systematic use of alternatives to detention and their enrichment based on the proposals of the Council of Europe.\(^{37}\)

- Restoring the possibility of granting residence permits for humanitarian reasons to vulnerable asylum seekers who have been definitively rejected.

- The extension of the protective framework granted by the postponement of removal (temporary access to health care, the labor market, etc.) in conjunction with the widespread application of these provisions when the conditions of the law are met.

- Providing support to the application process for residence permits for exceptional reasons, in conjunction with the support of the relevant services (Police Directorates of Aliens and Migration) and the provision of protection during the application period could be a first step. Subsequently, the revision and improvement of the provisions for the issuance of residence permits to long-term residents is a broader requirement in order to have an effective and fair treatment of this population.


■ The need for local government involvement to safeguard social cohesion at the local level and protect public health has emerged internationally as very important in terms of access to goods such as healthcare and housing.\(^\text{38}\)

■ The creation of a strategy for migration taking into account the real data for this population in combination with the possibilities and needs of our country and the corresponding legislative regulations.

3. THE SOCIAL INTEGRATION SERVICE IN NUMBERS (AUGUST 2018-OCTOBER 2021)

**GENDER**
- 82% Male
- 18% Female

**LEGAL STATUS**
- 65% Asylum seekers
- 31% Recognized refugees
- 4% Undocumented

**EDUCATION**
- 5% No official education
- 15% Primary education
- 20% Secondary education
- 41% High school
- 19% University degree

**AGE**
- 37% 18-24
- 44% 25-34
- 16% 35-44
- 3% 45+

Beneficiaries in employment → 163
Beneficiaries referred to educational programmes → 305
Legal sessions provided to beneficiaries → 448
Furthermore, the Covid-19 pandemic has allowed us to consider ways in which services such as ours can support vulnerable people in times of crisis:

1. **Access to valid information and psychosocial support is important.**

   During the pandemic, it became important to maintain channels of communication with people who were no longer able to communicate with us, to be available and to take into account the aggravating effects of the pandemic on their lives. For example, we used the Tips of the Day, with which our service sent through ideas for activities that the beneficiaries could engage into (e.g., enrollment in online courses, visits to digital museums, movies, etc.).

2. **Mutual respect, effective support and communication channels act as factors of resilience and empowerment.**

   Creating secure support networks and frameworks on which people can turn in times of uncertainty is paramount. Immediate access and communication with the Integration Service ensures that the beneficiaries are not alone in the integration process. Personalized procedures and provisions offer security at all levels and promote gradual autonomy.

3. **Bureaucratic obstacles need to be resolved at both the individual and the institutional level.**

   We try to provide solutions to the daily problems of our beneficiaries, and we do it successfully. However, we believe that documenting and
investigating the causes of these problems and the consequent intervention in the competent institutions for their overall solution, is the most sustainable approach to address these problems at their root causes. In this way, we can contribute to building a more welcoming environment for refugees in Greece.

4. The Integration Service functions as a common ground between actors and vulnerable groups.

This interaction that we facilitate allows our beneficiaries to reveal their true stories, which extend beyond their legal status.

5. The flexibility of services is necessary to adapt to any current situation and meet the needs of individuals.

Such are changes in legislation and procedures that hinder the coverage of basic needs (such as housing and food).

6. The real experts in integration are the people themselves, despite our prejudices.

The actions that are followed are decided by the very people we serve. Our personalized integration plans consider our beneficiaries as active shapers in their integration process instead of passive recipients of services.

7. The problems of refugees are problems of the society.

Poverty, homelessness, access to services and basic goods, are issues that affect many vulnerable groups, and we need to overcome them individually, socially and institutionally.
THE REPORT "THE WORK OF HUMANRIGHTS360 SOCIAL INTEGRATION SERVICE: TACKLING THE CHAIN BARRIERS TO INTEGRATION & REGISTERING THE "UNDOCUMENTED" PERSONS" WAS PREPARED BY THE SOCIAL INTEGRATION TEAM-INTEGRATEAM OF HUMANRIGHTS360