



Input by civil society organisations to the Asylum Report 2025

Dear Colleagues,

The production of the *Asylum Report 2025* is currently underway. The annual [Asylum Report](#) presents an overview of developments in the field of international protection in Europe.

The report includes information and perspectives from various stakeholders, including experts from EU+ countries, civil society organisations, researchers and UNHCR. To this end, we invite you, our partners from civil society, academia and research institutions, to share your reporting on developments in asylum law, policies or practices in 2024 by topic as presented in the online survey (**'Part A' of the form**).

We also invite you to share with us any publications your organisation has produced throughout 2024 on issues related to asylum in EU+ countries (**'Part B' of the form**).

These may be:

- reports;
- articles;
- recommendations to national authorities or EU institutions;
- open letters and analytical outputs.

Your input can cover information for a specific EU+ country or the EU as a whole. You can complete all or only some of the sections.

Please note that the Asylum Report does not seek to describe national systems in detail but rather to present key developments of the past year, including improvements and challenges which remain.

All submissions are publicly accessible. For transparency, contributions will be published on the EUAA webpage and contributing organisations will be listed under the Acknowledgements of the report.

All contributions should be appropriately referenced. You may include links to supporting material, such as:

- analytical studies;
- articles;
- reports;
- websites;
- press releases;
- position papers.

Some sources of information may be in a language other than English. In this case, please cite the original language and, if possible, provide one to two sentences describing the key messages in English.





The content of the Asylum Report is subject to terms of reference and volume limitations. Contributions from civil society organisations feed into EUAA's work in multiple ways and inform reports and analyses beyond the Asylum Report.

NB: This year's edition of the Asylum Report will be significantly revamped to achieve a leaner, more analytical report with streamlined thematic sections. The focus will be on key trends in the field of asylum rather than on individual developments. For this reason, information shared by respondents to this call may be incorporated in the Asylum Report in a format different than in the past years.

Your input matters to us and will be much appreciated!

*Please submit your contribution to the Asylum Report 2025 by **Friday, 10 January 2025**.*





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☒ I accept the provisions of the EUAA [Legal and Privacy Statements](#)

General Observations

Before sharing information by thematic area, please provide your general observations on asylum developments as indicated in the following three fields:

1. What areas would you highlight where important developments took place in the country/countries you cover?

No major developments could be addressed. On the other hand, swift changes of the Ministers and some of the General Secretaries took place, which imposed issues in the continuation of State's work and policy, mainly affecting the payments. During 2024 [interpretation](#) was paused and partly covered by EUAA staff, delays on the payments have been observed in unaccompanied children's [shelters](#), on the Guardians and the designated guardians, on the payment of [cash assistance](#) to asylum applicants and also on the [Lawyers at the Asylum Service Registry](#) who provide legal support in the Appeals Authority. Furthermore, the number of unaccompanied children have been vastly [increased](#), while the situation not only for [children](#) but for adults as well, not only in the [Aegean islands](#) but also in the [mainland](#), have been deteriorated in Reception and Identification Centres (RIC), camps and Closed Controlled Access Centres (CCAC).

2. What are the areas, where only few or no developments took place?

3. Would you have any observations to share specifically about the implementation of the Pact on Migration and Asylum in the national context of the country/ countries you cover?

We would like to highlight the fact that some practices (e.g CCAC's) which were implemented in Greece and especially in Greek borders have been included to the EU PACT as practices that would be used across EU, while it has been observed that such practices bring more violations to human rights. In addition, until now there were no plans from the Ministry on the





implementation of the EU Pact in Greece, except a call from the General Secretary of Migration Policy to the NGOs to send their comments on EU Pact, along with the services they provide.

PART A: Contributions by topic

Please share **your reporting on developments in asylum law, policies or practices in 2024 by topic**. Kindly make sure that you provide information on:

- ✓ New developments and improvements in 2024 and new or remaining challenges;
- ✓ Changes in legislation, policies or practices, or institutional changes during 2024.

1. **Access to territory and access to the asylum procedure** (including first arrival to territory and registration, arrival at the border, application of the *non-refoulement* principle, the right to first response (shelter, food, medical treatment) and issues regarding border guards)

Network for Children's Rights ("NCR"), is one of the implementing partners of the National Emergency Response Mechanism for unaccompanied minors in precarious living conditions ("NERM"), which is under the General Secretariat for Vulnerable Persons & Institutional Protection (former Special Secretary for the Protection of Unaccompanied Minors) of the Ministry of Migration and Asylum.

In this framework, all matters related to unaccompanied and separated children (UASC) are interlinked to the operation of the NERM.

Regarding the access to territory and the asylum procedure, it is important to mention that still unaccompanied children in the mainland are exempt from the screening procedure and the Identification Procedure through the RIC of Malakasa and Diavata and may lodge their asylum claim directly with the Greek Asylum Service. Regarding the Registration and Identification procedure under the NERM, all undocumented UASC over 14 years old, who are identified in Attica are accompanied by the Mobile Child Protection Units in ten (10) responsible police departments (AT Ambelokipoi/ AT Kaisariani/ AT Pefki-Lykovrysi/ AT Cholargos/ AT Saronikos/ AT Argyroupoli-Elliniko/ AT Rentis/ AT Korydallos/ AT Mandra-Eidyllia/ AT Agioi Anargyri-Kamatero) for registration/identification. The procedure of identification that is implemented by the police authorities is provided by the law 3907/2011. The Police officers are taking pictures of UASC, registering their basic information (name, surname, father's name, mother's name, date of birth, nationality, mother tongue, entry point in Greece and religion), taking fingerprints and uploading them in various databases like EURODAC / Criminal Record etc. for security check. Then, following the relevant recommendation of the Police officer, the Return Department of the Ministry of Citizen's Protection issues on the same day a deportation and return order that is automatically suspended (articles 78 N. 3386/2005 and 28 N. 3907/2011), as long as the UASC remain at the shelter where they are placed. In practice, the deportation order is suspended until the child becomes an adult (ie. 18 years old). At the end of the procedure an administrative police file is created for each UASC and a document is issued with: 1) UASC's basic information (name, surname, father's name, mother's name, date of birth, nationality and place of placement), 2) with a unique number called "DIKA number" which





corresponds to the administrative file and 3) elucidation of deportation procedure and its suspension. The document is the first legal document an UASC over 14 years old receives in Greece and protects him/her from police arrest/ deportation till he/she claims asylum upon Asylum Service. The UASC, as long as they remain in the police station, are considered administratively detained, though in practice, they remain in the waiting area for the implementation of the identification procedure. The procedure lasts long, approximately 8 to 12 hours.

Only UASC survivors of shipwrecks and UASC, who have been rescued at sea are registered at Malakas's RIC and not in police departments. It is important to note that in 2024 the number of UASC rescued in shipwrecks has been vastly increased, mainly from the island of Crete.

Furthermore, taking into consideration the vast increase of the UASC in Greece, the Ministry of Asylum And Migration decided to operate a [safe area](#) within the RIC of Malakasa and in the end of 2024 a similar one in the RIC of Diavata, in order to host the UASC.

Regarding pushbacks, from many [reports](#) it has been observed that they continue and Greece has been accused for continuing the practices of pushbacks – unforced returns.

From NCR work on the field on supporting UASC, NCR has received testimonies of UASC being pushed back. Children refer that their personal items (cell phones, wallets, documents, etc.) have been stolen, they have been undressed of their clothes and remained with their underwear and they have been beaten and threatened. Some testimonies, especially when the place of detection is near the region of Evros River, indicate that the detention/restriction of freedom of movement stage is skipped so that the informal forced return is carried out immediately after the detection. Testimonies indicate that both persons in uniform and persons in civilian clothes appear to have been involved in these operations, supporting therefore the assumption that in these operations citizens not legally entitled to exercise public authority may have participated. This assumption is further supported by testimonies indicating that third country nationals speaking some of the victims' languages appear to have been involved as perpetrators in the process of physical removal. Furthermore, the vast majority of the testimonies report the use of violence during the physical removal stage, either by people in uniform or by other persons.

ECRE has [reported](#) the ongoing pushbacks, while the Recording Mechanism of Incidents of Informal Forced Returns established by the Greek National Commission for Human Rights (GNCHR) has issued its annual [report](#) for 2023. In the report there are recorded testimonies about 45 Informal Forced Returns (IFR) incidents, reportedly occurred in the period between January 2022 and December 2023, through personal interviews with 37 alleged victims. According to testimonies about 45 IFR incidents, the total number of the alleged victims, is estimated to a minimum of 1.438 persons, including at least 158 women, 190 children and 41 persons having special needs, such as persons with medical conditions, elderly people, people with disabilities. In addition, in the same report there has been referred 118 unaccompanied children who have reported that they have been victims of IFR incidents.

Finally, as regards the Pylos shipwreck which was the deadliest shipwreck [NGOs](#) has announced the closure of the preliminary investigation by the prosecution of the Piraeus





Maritime Court on the Pylos shipwreck, requested though additional investigation, stating that judicial investigation and accountability for the Pylos shipwreck are matters of Rule of Law.

2. Access to information and legal assistance (including counselling and representation)

Unaccompanied and Separated Children (“UASC”) access to information and legal assistance falls under the scope of NERM of the General Secretariat of Vulnerable Persons and Institutional Protection (“GGSVPIP”) and its implementing partners (NCR, ARSIS, IOM, METAdrasi). In the CCACs of the Aegean islands (Kos, Chios, Lesbos, Samos, Leros), UASC are fall under the scope of GGSVIP and the implementing partner (Zeuxis).

NERM’s key core is the timely identification of unaccompanied children living on the street or in precarious living conditions and their transfer to safe accommodation aiming to provide an operational alternative to the practice of protective police custody (abolished with Law 4760/2020). NERM also attempts to cover for the lack of services for UACs who do not wish to be formally accommodated. NCR in cooperation with NERM implements two different programs, aiming to support UASC in the region of Attica and southern Greece, from the moment of their identification to the completion of the placement procedure. UASC in the region of Thessaloniki and northern Greece are supported by ARSIS respectively. After UASC official accommodation, access to information and legal assistance are covered by the accommodation actors. Below is a short description of the operation procedures of NERM as implemented by NCR’s programs CPU (Info Desk-Mobile Units) and Protection for all Minors.

- (i) CPU is consisted of case workers, lawyers, psychologists, drivers and cultural mediators and is divided into two main pillars: Info Desk: Open Monday to Friday from 10.00 to 20.00. UASC served by the Info Desk team are either direct referrals from the National Mechanism, spontaneous arrivals at NCR office, or identified by CPU streetwork team. Case workers, psychologists and lawyers assess the needs of each child, with their best interest in mind and inform them of their rights. The aim of the program is the protection and immediate support of unaccompanied minors who either live in precarious conditions or are completely homeless, through their immediate accommodation in Emergency or Long-Term Accommodation Structures. Mobile Units: Three (3) Mobile Units operate Monday to Friday from 08.00 am to 23.00 pm and on Saturday from 11.00 am to 19.00 pm within Attica. Mobile Units, consisting of case workers, psychologists, cultural mediators and drivers, receive orders from NERM to transfer UASC to Emergency or Long-Term Accommodation Structures. Mobile Units accompany UASC, to the relevant police stations for identification, for medical examinations when deemed necessary and then to Accommodation Structures. UASC assessment is conducted in NCR premises by the Info Desk team. However, in extremely vulnerable cases, Mobile Units carry out the identification and on-site assessment of the needs and best interests of UASC.
- (ii) Protection for All Minors, consisting of case workers, psychologists, lawyer and cultural mediators, aims to inform, support and empower UASC who do not wish to





be formally accommodated (falling outs) thus not having access to services, and in particular to inform them, support and strengthen them in order to leave the unsafe living conditions and chose to be supported by NERM. The program operates an Urban Safe Space for UASC, open daily from 11:00 to 19:00. The program's aim is to offer psychosocial and legal support to UASC, conduct individual or group meetings and organize social and empowerment activities, based on their needs, with the goal to remove them from precarious living conditions. Also, Attendants have presence at the Regional Asylum Offices (Alimos, Attica, Piraeus), offering information to UASC, who request international protection and supporting adult relatives (brothers, uncles etc) of UASC to undertake responsibility for the actual care of the child through the Public Prosecutor for Minors.

3. Provision of interpretation services (e.g. introduction of innovative methods for interpretation, increase/decrease in the number of languages available, change in qualifications required for interpreters)

As mentioned above under 1, the suspension of interpretation services has caused serious disruptions to the operations of the Regional Asylum Offices (RAO). Namely in RAOs in Attica, where NCR's Case Management Team has frequent presence, it has been observed that asylum application registrations as well as asylum interviews would get repeatedly postponed due to the lack of available interpreters. Especially in the case of UASC, sometimes the new registration or interview date would be scheduled more than six months later than the initial one, by which date some UASC would have turned 18 already, thus missing the opportunity to have their asylum application examined while they are still children, for reasons beyond their control.

4. Dublin procedures (including the organisational framework, practical developments, suspension of transfers to selected countries, detention in the framework of Dublin procedures)

5. Special procedures (including border procedures, procedures in transit zones, accelerated procedures, admissibility procedures, prioritised procedures or any special procedure for selected caseloads)

6. Reception of applicants for international protection (including information on reception capacities – increase/decrease/stable, material reception conditions – housing, food, clothing and financial support, contingency planning in reception, access to the labour market and vocational training, medical care, schooling and education, residence and freedom of movement)

Within the framework of the operation of NERM, International Organization of Migration (IOM) is operating in the mainland, specially designed emergency accommodation structures for UASC





found to be living in a state of homelessness or precariousness. There, IOM provides housing, food, clothing, legal and psychosocial support services as well as support for access to health care. In the emergency structures UASC remain until the necessary procedures are completed, so that they can be placed in long-term accommodation facilities, operated by several NGOs across Greece, based on their needs and best interest.

In addition, the Ministry of Asylum And Migration decided to operate a [safe area](#) within the RIC of Malakasa and in the end of 2024 one more safe area in the RIC of Diavata, in order to host the UASC, taking into consideration the vast increase of the UASC in Greece on 2024.

- 7. Detention of applicants for international protection** (including detention capacity – increase/decrease/stable, practices regarding detention, grounds for detention, alternatives to detention, time limit for detention)
- 8. Procedures at first instance** (including relevant changes in: the authority in charge, organisation of the process, interviews, evidence assessment, determination of international protection status, decision-making, timeframes, case management – including backlog management)
- 9. Procedures at second instance** (including organisation of the process, hearings, written procedures, timeframes, case management – including backlog management)
- 10. Issues of statelessness in the context of asylum** (including identification and registration)
- 11. Children and applicants with special needs** (special reception facilities, identification mechanisms/referrals, procedural standards, provision of information, age assessment, legal guardianship and foster care for unaccompanied and separated children)

The number of Unaccompanied and Separated Children (“UASC”) in Greece is [2,414 children](#) based on the statistics of the Ministry of the Migration and Asylum. Though it should be noted that in this number only the UASC that has been accommodated under the GGVPIP is depicted and not the number of UASC who don’t want to be accommodated and want to remain outside of the accommodation system.

A huge issue regarding UASC, is the lack of sufficient long-term accommodation places, which was reduced from 2,024 in July 2024 to 1,771 in August 2024, contrary to the National Strategy for the Protection of Unaccompanied Minors, which sets a target of 2,500 places.¹

¹ Ministry of Migration and Asylum, *National Strategy for the Protection of Unaccompanied Minors*, 2022, p.33: “It is necessary to increase the capacity of the country’s sheltering system for unaccompanied minors in





As regards the reception facilities of UASC see above under 6.

Regarding guardianship the law 4960/2022 has been implemented and the Guardians which are two NGOs, legal persons, are in place. According to the law provisions the Public Prosecutor for Minors and the Department of the Institutional Protection of the General Secretariat of the Vulnerable Persons and Institutional Protection under the Ministry of Asylum and Migration will be informed for every UASC in Greece. Then the Public Prosecutor will designate the Guardian and the Guardian will designate the natural persons, employers under the Guardian, who will be the designated guardians for each UASC. Every designated guardian can have up to 15 UASC. According to the law the designated guardians will be up to 180.

Although the implementation of the Guardianship scheme has been initiated, there has been observed delays in the designation both of the Guardians, but also for the designated guardians. Furthermore, issues regarding the role of the designated Guardians have been arise, mainly in the separated children, but also on the legal support of both unaccompanied and separated children.

With regards to the asylum procedure, NCR has noticed that since mid-2024 the Asylum Unit for Vulnerable Groups of Attica has developed the consistent practice of issuing decisions to discontinue the examination of the asylum application (suspension decisions) for UASC that have informally left their shelters. This practice seems to be based on article 86 para. 2(d) of L. 4939/2022 which stipulates that "Implicit withdrawal is deemed to have been established when the applicant [...] has left the place where he or she lived without authorization or without contacting the competent authorities, if he or she was obliged to do so, or left the country without authorization from the competent receiving authorities". It has been observed that, contrary to the best interests of the child principle, these suspension decisions were issued despite the fact that a designated guardian had not yet been appointed to the UASC, and therefore it was not possible for the UASC to be notified of the decision or to apply to reopen the case, until a designated guardian has been appointed. Moreover, it has been observed that the legal effects of the suspension decision were taking place before the notification of the decision to the UASC, and, in particular, the asylum card was deactivated upon the issuing of the decision, without the UASC having been informed about the said decision in any way. As a result, UASC lacking a guardian would have no immediate access to remedies, and would therefore be deprived of the rights accorded to asylum seekers in general but also of the special protection applied to UASC.

Finally, we support alleged minors, who have been registered as adults, and there are doubts for their age to undertake the age assessment procedure, based on the competent JMD on age assessment. In the age assessment procedure within 2024 issues have been observed on the acceptance of the request and the implementation of the JMD by the Reception and Identification Service, as one of the competent authorities, along with issues regarding interpretation of the procedure.

order to meet the needs and the realize the rights of unaccompanied minors, by strengthening long-term accommodation and aiming specifically at two thousand five hundred (2,500) places." (unofficial translation)





12. Content of protection (including access to social security, social assistance, health care, housing and other basic services; integration into the labour market; measures to enhance language skills; measures to improve attainment in schooling and/or the education system and/or vocational training)

13. Return of former applicants for international protection

14. Resettlement and humanitarian admission programmes (including EU Joint Resettlement Programme, national resettlement programme (UNHCR), National Humanitarian Admission Programme, private sponsorship programmes/schemes and ad hoc special programmes)

15. National jurisprudence on international protection in 2024 (please include a link to the relevant case law and/or submit cases to the [EUAA Case Law Database](#))

16. Other important developments in 2024

Part B: Publications

1. If available online, please provide links to relevant publications produced by your organisation in 2024:

NCR, Intersos Hellas, The invisible unaccompanied children, Protection for all minors, programm report in [Greek](#) and the executive summary in [English](#),

Eurochild, [Children's Realities in Europe: Progress & Gaps](#), Network for Children's Rights and the Smile of the Child, pages 79-85, 20/11/2024,

Below you can find reports and open letters which Network for Children's Rights have co-sign and support:

[132 Civil Society Organisations Call on MEPs to Uphold Fundamental Rights and Reject the Harmful Schengen Borders Code Recast](#)

[Safeguarding the rights of unaccompanied children at EU Borders under the EU Pact on Migration and Asylum](#)

[Greece Must Ensure The Rights Of Refugees To Family Reunification](#)

[Civil Society Organisations Call on MEPs to Vote Down Harmful EU Migration Pact](#)

[JOINT PRESS RELEASE: Hundreds of unaccompanied children in Unsafe Zones: Need for an Immediate Activation of Relocation](#)

2. If not available online, please share your publications with us at:

Asylum.Report@euaa.europa.eu





3. For publications that due to copyright issues cannot be easily shared, please provide references using the table below.

	Title of publication	Name of author	Publisher	Date
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