

Beneficiaries of international protection in Greece

Access to documents and socio-economic rights

March 2024

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List of abbreviations

AADE	Independent Authority for Public Revenue Ανεξάρτητη Αρχή Δημοσίων Εσόδων
AAU	Autonomous Asylum Unit Αυτοτελές Κλιμάκιο Ασύλου
ADET	Residence permit Άδεια Διαμονής Ενιαίου Τύπου
AFM	Tax Identification Number Αριθμός Φορολογικού Μητρώου
AMA	Social Security Member Registration Number Αριθμός Μητρώου Ασφαλισμένου
AMKA	Social Security Number Αριθμός Μητρώου Κοινωνικής Ασφάλισης
DADP	International Protection Applicant Card Δελτίο Αιτούντος Διεθνούς Προστασίας
DOY	Tax Office Διεύθυνση Οικονομικών Υποθέσεων
ECHR	European Convention on Human Rights
EFKA	Unified Social Security Fund Ενιαίος Φορέας Κοινωνικής Ασφάλισης
EU	European Union
HELIOS	Hellenic Integration Support for Beneficiaries of International Protection and Beneficiaries of Temporary Protection
KEM	Migrant Integration Centre Κέντρο Ένταξης Μεταναστών
KEP	Citizens' Service Centre Κέντρο Εξυπηρέτησης Πολιτών
ΠΑΑΥΡΑ	Provisional Foreigner's Insurance and Health Care Number Προσωρινός Αριθμός Ασφάλισης και Υγειονομικής Περίθαλψης Αλλοδαπού
RAO	Regional Asylum Office Περιφερειακό Γραφείο Ασύλου
TAA	Aliens Unit of Attica Τμήμα Αλλοδαπών Αττικής

Introduction*

Refugees in Greece face chronic legal and practical obstacles to access to documents and socio-economic rights. These barriers, coupled with a policy expecting immediate autonomy and self-sufficiency, expose many holders of international protection to situations of homelessness and destitution. Beneficiaries of international protection in Greece have no effective remedy against violations related to deprivation of socio-economic rights and to destitution.

These conditions continue to create potent risks of breach of the minimum standards set by Article 3 of the European Convention on Human Rights (ECHR) and Article 4 of the Charter of Fundamental Rights of the European Union according to jurisdictions throughout Europe.¹ Against this backdrop, the European Commission has launched infringement proceedings against Greece under Letter of Formal Notice INFR(2022)2044 for poor implementation of the Qualification Directive as regards the content of international protection granted.²

Yet, whereas countries such as Germany or the Netherlands have adopted policies opposing deportations of beneficiaries of international protection to Greece apart from exceptional cases,³ European states still pursue returns of recognised refugees to Greece on the ground that they can enjoy the rights attached to their granted status.⁴

As a rule, readmission of beneficiaries of international protection from other European countries takes place via Athens International Airport. Upon arrival at the airport, beneficiaries receive no information on housing options or on procedures for access to their rights in Greece. They may be issued a police note (*υπηρειακό σημείωμα*) in Greek, instructing them to appear before the Asylum Service if they do not hold documentation. In recent cases supported by Refugee Support Aegean (RSA), however, returnees have not received a police note or any other document.

Case study: Bashir* is a refugee from Afghanistan, granted asylum in Greece in 2022 before travelling to **Germany**. After his asylum application was rejected in said country as inadmissible, he remained in Germany under a postponement of removal order for eight months. He was subsequently returned to Greece through readmission proceedings and under police escort at the end of May

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- * Names of persons cited in this report have been changed to protect safety and privacy.
- ¹ Namely (Austria) Constitutional Court, E3231/2022, 29 April 2022; Federal Administrative Court, W185 2265514-1, 29 November 2023; W185 2262851-1, 16 October 2023; (Belgium) Council of Alien Law Litigation, 297654, 24 November 2023; 294599, 25 September 2023; (Germany) Higher Administrative Court of North Rhine-Westphalia, 11 A314/22.A, 5 April 2022; Higher Administrative Court of Baden-Württemberg, A 4 S 2443/21, 27 January 2022; Higher Administrative Court of Bremen, 1 LB 371/21, 16 November 2021; (Switzerland) Federal Administrative Court, E-2716/2023, 4 December 2023; (Netherlands) Council of State, 202005934/1/V3, 28 July 2021.
- ² European Commission, 'January Infringements package: key decisions', INF/23/142, 26 January 2023, available [here](#).
- ³ Government of the Netherlands, 'Kamerbrief over diverse onderwerpen migratiebeleid', 7 November 2022, available [here](#); InfoMigrants, 'Germany to process frozen asylum claims of refugees from Greece', 21 March 2022, available [here](#).
- ⁴ Among others, 158 beneficiaries were returned from Germany to Greece in 2023: Welt, '12.000 in Griechenland anerkannte Flüchtlinge haben in Deutschland erneut Asyl erhalten', 6 March 2024, available [here](#).

2023. Upon arrival at Athens airport, Bashir was briefly detained and was subsequently released without receiving any document or information. He stayed homeless on the streets for two days and has since remained in precarious living conditions without stable shelter or income.

Beneficiaries of international protection who have sought asylum in another country and have submitted there the identity and travel documents issued to them by the Greek authorities may be returned to Greece without said documents in their possession. They may also face serious delays in retrieving them:

Case study: Bashir*, as stated above, was returned from **Germany** to Greece at the end of May 2023. He was deported without holding the original residence permit and passport he had obtained from the Greek authorities; both had been submitted to the German authorities and had not been returned to him. Upon intervention of his lawyers to the Greek Consulate in Hamburg at the end of September 2023, Bashir was informed that the consular authorities sent his original documents to the Greek Asylum Service in early October. Locating and retrieving the documents from the Asylum Service upon intervention and appointment were only made possible at the end of November, six months after his readmission.

The present report provides up-to-date information on the conditions facing persons who receive international protection in Greece, including those returned in the context of readmissions from other European countries, based on cases legally supported by RSA. It tracks the grant and renewal of necessary documents for their access to socio-economic rights such as employment, housing, health care, education and social assistance. The report focuses in particular on access to residence permits and other documents, to the HELIOS programme and to the risk of homelessness and destitution. Issues relating to refugees' access to other rights are documented in detail in our previous reports.⁵

Residence permit (ADET)

Beneficiaries of international protection in Greece continued to face significant challenges owed to administrative barriers and to severe delays in the issuance of necessary documentation for their access to basic rights e.g. health care, housing, social assistance, employment and even legal representation under equal conditions to Greek nationals.

Most difficulties concern access to a residence permit (Άδεια Διαμονής Ενιαίου Τύπου, ADET), the identity document valid for three years in the case of refugees and one year in the case of subsidiary protection holders.⁶ ADET is a prerequisite for obtaining and maintaining a Social Security Number (Αριθμός Μητρώου Κοινωνικής Ασφάλισης, AMKA), for accessing employment, for receiving social benefits, even for movement within the Greek territory.

⁵ Namely, RSA & Stiftung PRO ASYL, *Beneficiaries of international protection: Access to documents and socio-economic rights*, March 2023, available [here](#); March 2022, available [here](#); March 2021, available [here](#).

⁶ Article 23(1) Asylum Code, L 4939/2022, Gov. Gazette A' 111/10.06.2022.

First step: Asylum Service decision

Initial ADET grant

The process of granting ADET to people recognised as refugees or subsidiary protection beneficiaries starts with the issuance of an “ADET Decision” by the Asylum Service. This decision is issued by the competent Regional Asylum Office (Περιφερειακό Γραφείο Ασύλου, RAO) or Autonomous Asylum Unit (Αυτοτελές Κλιμάκιο Ασύλου, AAU) and approves the grant of the permit to the person concerned. The asylum decision is a necessary but not a sufficient condition for the issuance of the residence permit.

According to the ADET Regulation, the “ADET Decision” shall be incorporated in the asylum decision issued by the Asylum Service or the Appeals Authority.⁷ In any case, it shall be notified to the beneficiary on the same day as the asylum decision, in line with a Ministry of Migration and Asylum Circular.⁸ At the time of writing, the Asylum Service still issues separate “ADET Decisions” which it notifies at the same time as the decision approving the asylum application.

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

Gaps in formalities of Asylum Service decisions: The absence of crucial formal elements in asylum decisions and ADET Decisions of the Asylum Service has been a frequent issue in cases supported by RSA throughout the past year. As a result, the Hellenic Police does not accept those decisions for the purpose of issuing ADET under the procedure described further below. Even after the Asylum Service inaugurated its new “Alkyoni II” information system in 2023,⁹ several beneficiaries' personal details such as gender are omitted or incorrectly recorded in ADET Decisions. Correcting these Asylum Service decisions can be particularly problematic due to technical limitations on the uploading of corrigenda on the “Alkyoni II” database and on access thereto by the Hellenic Police.

Case study: Farzana*, a refugee from Afghanistan, was granted refugee status by RAO Piraeus at the end of September 2023. The ADET Decision she received by the same Office in early October wrongly stated her gender as “male” instead of “female”. Due to this, Farzana's documents were not accepted by the Hellenic Police on her appointment at the end of October. On the next day, Farzana received a corrected ADET Decision by RAO Piraeus, explicitly titled “corrigendum on gender”. However, this decision too was not accepted upon her new appointment with the Police at the end of November. Police authorities orally explained that the decision was not visible on the Hellenic Police online database. That day, Farzana's lawyers submitted an urgent request to RAO Piraeus which responded in writing that “the issue was resolved... Now

⁷ Article 2(1) and (3) ADET Regulation, JMD 513542/2022, Gov. Gazette B' 4763/12.09.2022.

⁸ Ministry of Migration and Asylum, Circular 68883/2023 – Εγκύκλιες οδηγίες σχετικά με την εφαρμογή της με αρ. 513542 Κοινής Υπουργικής Απόφασης (ΦΕΚ Β' 4763/12.09.2022) «Διαδικασία χορήγησης Άδειας Διαμονής Ενιαίου Τύπου στους δικαιούχους διεθνούς προστασίας», 31 January 2023, 2.

⁹ RSA, 'The upgrade of the "Alkyoni" system of the Asylum Service leaves processes and people in the air', 31 May 2023, available [here](#).

it should normally be also visible on the Police [database]." Yet, the corrigendum of the ADET Decision in question was still not visible on the Hellenic Police database until the beginning of December. Farzana was only able to submit documents with a view to obtaining an ADET in mid-December 2023, after the Asylum Service uploaded the decision question as a photograph (.jpg file) on "Alkyoni II".

Case study: Mahmoud*, a refugee from Syria and survivor of the deadly shipwreck of June 2023 off the coast of Pylos, received refugee status by the AAU Nikaia of the Asylum Service in mid-July 2023. However, his ADET Decision did not mention his gender. Consequently, it was not possible for him to submit documents for the issuance of his residence permit upon appearing before the Hellenic Police in mid-August. Mahmoud was only notified a corrected ADET Decision in mid-September 2023, following a request from his lawyers.

Moreover, several asylum decisions and ADET Decisions which are notified by the Asylum Service via email bear no signature or are signed by a different official to the one issuing the decision. As a result, these decisions are also not accepted as documents for the purpose of issuing ADET.

Case study: Khalid* is a refugee from Syria and a survivor of the deadly Pylos shipwreck. In early October 2023, he received via email a refugee status decision and an ADET Decision from the AAU Fast-Track, neither bearing a signature. Following a request from Khalid's lawyers, the AAU Fast-Track issued a new copy of the ADET Decision. That copy was electronically signed not by the official who issued it – the Head of Office – but by a different official. For its part, the asylum decision notified to Khalid was signed not by the caseworker who issued it but by another official, different from the one signing the ADET Decision. In light of this, Khalid's documents were not accepted when he attended his appointment with the Hellenic Police. Subsequently, his lawyers appeared before the AAU Fast-Track to receive new, correctly signed copies of the decisions. They were then informed that the Office was not in a position to deliver a physical copy of the decisions since they had been electronically signed. No earlier than October 2023 was Khalid notified a copy of duly signed decisions so as to be able to submit documents for issuance of his ADET.

Territorial competence of the issuing office: The RAO or AAU of the Asylum Service which issues the ADET Decision and asylum decision must correspond to the territorial competence of the Passport Office of the Hellenic Police which will receive the documents and print the ADET, as described below. For instance, the Aliens Unit of Attica (*Τμήμα Αλλοδαπών Αττικής, ΤΑΑ*) is territorially competent for cases handled by the RAO and AAU of Attica.¹⁰ Otherwise, the Hellenic Police does not accept the ADET application, and the beneficiary of international protection must refer again to a territorially competent RAO or AAU in order to obtain exact copies of their asylum decision and ADET Decision, stamped by that office. This issue often emerges in the case of people who submit an asylum claim on the islands, are subsequently transferred to the mainland by the authorities and are then recognised as refugees by a decision of the initial RAO, often notified electronically.

¹⁰ Article 5(1) ADET Regulation.

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

ADET renewal

ADET renewal applications must be submitted to the Asylum Service no later than 30 days prior to the expiry of the permit. Late renewal applications without due reasons face a 100 € fine.¹¹ A Circular of the Ministry of Migration and Asylum specifies that “reasons” should be interpreted as follows: “the mere submission of any reason for negligence on the part of the beneficiary in submitting the application in time shall not suffice. Reasons shall be given which in fact justify exceeding of the deadline set by law on the basis of objective criteria or events, without mandatory written evidence. The reasons invoked by the applicant shall be accepted where they are in line with the conduct of the ordinary reasonable person.”¹²

Beneficiaries of international protection wishing to renew their ADET submit a “Residence Permit Renewal Application” with a digital photograph to the competent unit of the Asylum Service, the AAU Beneficiaries of International Protection. Applications are filed via email to a dedicated address: gas.residencepermits@migration.gov.gr.

Only eight out of a total of 29 of the aforementioned Unit are responsible for processing ADET renewal applications. No European Union Agency for Asylum (EUAA) personnel has been seconded to that Unit according to statistics shared by the Asylum Service in mid-February 2024.¹³

The number of ADET renewal applications pending at the AAU Beneficiaries of International Protection has risen from 2,588 as of 31 December 2022 to 4,029 as of 16 February 2024. This represents a substantial 56% increase on the backlog of cases in the past year.¹⁴ The 4,029 applications at the AAU Beneficiaries of International Protection were pending at the following procedural stages:

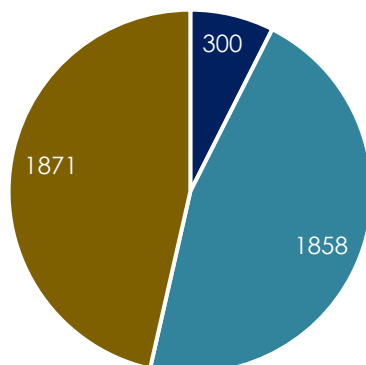
¹¹ Article 23(1) Asylum Code; JMD 513551/2022, Gov. Gazette B' 4763/12.09.2022.

¹² Ministry of Migration and Asylum, Circular 69244/2023 – Εγκύκλιες Οδηγίες σχετικά με την εφαρμογή της με Αριθμ. 513551/05.09.2022 (B' 4763) Κοινής Απόφασης των Υπουργών Οικονομικών και Μετανάστευσης και Ασύλου «Καθορισμός του αρμόδιου οργάνου επιβολής και της διαδικασίας βεβαίωσης του προστίμου του εβδομομυ εδαφίου της παρ. 1 του άρθρου 23 του ν. 4939/2022 (Α' 111)», 1 February 2023, 4.

¹³ *Ibid.*

¹⁴ Asylum Service, 'Ανανέωση Ταυτοποιητικών Εγγράφων Δικαιούχων Διεθνούς Προστασίας', 58515/2024, 16 February 2024, 2. Cf. Ministry of Migration and Asylum, Reply to parliamentary question, 156079/2023, 16 March 2023, available [here](#).

Pending ADET renewal applications by stage: 16 Feb 2024



■ Uploading on "Alkyoni" ■ Assignment to caseworker ■ Case processing

Source: Asylum Service, 16 Feb 2024

These figures demonstrate critical gaps in human resources at the AAU Beneficiaries of International Protection,¹⁵ as expressly acknowledged by the Asylum Service. These gaps undermine its capacity to manage such cases. Importantly, the majority of pending ADET renewal applications are at the stage of delegation to a Unit caseworker.

Delays in receipt of renewal applications: The Asylum Service notes that "following the online submission of ADET renewal applications by beneficiaries of International Protection, applications are checked for correctness and completeness and are subsequently registered and uploaded on the information system in order for the issuance of a related certificate to be made possible".¹⁶

The Code of Administrative Procedure provides that any document received by a public authority shall be registered on the same day.¹⁷ The Ombudsman has recalled this obligation to the Asylum Service in the specific context of ADET renewal applications.¹⁸ In a recent letter, the Asylum Service highlights that "registration of applications is carried out at the latest within 5 days from the transmission of the application, and 70-80% of the total of applications require additional checks and review".¹⁹ In cases represented by RSA, however, registration of ADET renewal applications submitted to the AAU Beneficiaries of International Protection exceeds by far the above time limits. The sole uploading of the renewal application on the Asylum Service database ("Alkyoni") may take months in light of the volume of requests managed by the AAU Beneficiaries of International Protection.

¹⁵ European Commission, *Operational Conclusion 13th Steering Committee for Migration Management*, Ares(2023)8358057, 28 September 2023, 4.

¹⁶ Ombudsman, 316047/3924, 24 January 2023.

¹⁷ Article 12 Code L 2690/1999, Gov. Gazette A' 45/09.03.1999.

¹⁸ Ombudsman, 316047/3924, 24 January 2023; "Έλλειψη ομοιομορφίας μεταξύ των βεβαιώσεων δικαιούχων διεθνούς προστασίας που εκδίδονται από τα κατά τόπους αρμόδια Π.Γ.Α./Α.Κ.Α. Αττικής", 316047/65864, 2 December 2022.

¹⁹ Asylum Service, 'Ανανέωση Ταυτοποιητικών Εγγράφων Δικαιούχων Διεθνούς Προστασίας', 58515/2024, 16 February 2024, 1.

Case study: Mohanad*, a refugee from Syria, requested the renewal of his ADET on 28 March 2023, almost two months after his return to Greece in early February via readmission procedures from **Germany**. His application was uploaded on "Alkyoni" and was registered almost three months later, on 15 June 2023. This marked the start of processing of Mohanad's ADET renewal application. The application is still pending at the AAU Beneficiaries of International Protection.

Case study: Fatima*, a refugee from Ethiopia, was granted asylum in Greece in 2015. She voluntarily returned to Greece from **Germany** and submitted an ADET renewal application to the AAU Beneficiaries of International Protection on 7 March 2023. The application was only registered on 27 April 2023, nearly two months later.

Case study: Noorullah*, a refugee from Afghanistan, was granted asylum in Greece in 2015. He voluntarily returned from **Germany** at the end of December 2023 after his asylum claim there was dismissed on the ground of his status in Greece. His ADET renewal application was submitted on 18 January 2024 but was registered by the AAU Beneficiaries of International Protection, almost one month later.

Delays in processing of applications: The AAU Beneficiaries of International Protection issues an "ADET Renewal Decision" for the purposes of renewal of the ADET. Prior to this decision, the Asylum Service carries out a background check in order to assess whether there are public order or national security grounds which would hinder the renewal of the permit.²⁰ The background check by the Asylum Service consists in approaching competent police and judicial authorities with a view to verifying whether the person in question has been prosecuted or convicted for offences giving rise to public order or national security grounds. This stage may take several months in practice.²¹

Case study: In the case of **Mohanad***, Syrian refugee returned to Greece from **Germany**, the processing of the ADET renewal application has been pending for over one year, from the end of March 2023 to present.

Case study: Parwana* is a refugee from Afghanistan, returned to Greece via readmission procedures from **Sweden**. She requested the renewal of her ADET in early December 2022. However, the AAU Beneficiaries of International Protection issued an ADET Renewal Decision in early November 2023, eleven months later.

Finally, we recall that the Attica Directorate of the Asylum Service includes three RAO and six AAU in the Attica region.²² Several cases encounter serious obstacles owed to ambiguities as to the competent RAO or AAU to carry out the process, especially as regards returnees from other countries who may have received status in Greece

²⁰ Article 23(2) Asylum Code.

²¹ Ombudsman, 'Καθυστερήσεις πλέον του έτους στη διαδικασία ανανέωσης Α.Δ.Ε.Τ. σε υπόθεση δικαιούχου διεθνούς προστασίας', 316047/64653/2022, 28 November 2022.

²² Article 29 PD 106/2020, as amended by Article 10 PD 77/2022.

several years before the establishment of certain Offices and Units. We reiterate that returnees readmitted via Athens International Airport do not receive clear and accurate information on the competent authorities they should approach in order to obtain or renew their documents.

Case study: Noorullah*, as stated above, was granted refugee status in Greece in 2015 and voluntarily returned from Germany at the end of December 2023. Upon arrival at Athens International Airport, he was advised by the police authorities to approach the Aliens Unit of Attica ("Petrou Ralli") to obtain his identity documents. When he appeared at "Petrou Ralli", police authorities referred him to the Central Asylum Service ("Katehaki"). When he went there, however, he was not allowed to enter and was given the email address of RAO Attica: as.rao.attica@migration.gov.gr. None of the above authorities is competent to grant and renew Noorullah's documents. The authorities to which he should have been referred are RAO Piraeus, and AAU Beneficiaries of International Protection for the renewal of his ADET.

Second step: submission of documents to the Hellenic Police

Only after the issuance of an ADET Decision or an ADET Renewal Decision may beneficiaries of international protection file an email to request an appointment with the territorially competent Passport Office of the Hellenic Police for the purpose of submitting documents for the issuance of the permit.²³ Such an appointment must be requested within six months of the issuance of the ADET Decision or ADET Renewal Decision, otherwise a new Decision must be taken.

The Aliens Unit of Attica (*Τμήμα Αλλοδαπών Αττικής*) is the competent office for Attica. In the cases supported by RSA over the past year, waiting times for appointments for submission of documents to TAA ranged from two or five days to four weeks from the submission of the request. Waiting times reached one or two months in some exceptional cases:

Waiting times for appointments to submit documents at TAA in RSA cases			
	Request	Appointment	Days
Soraya*	16 Feb 2024	21 Feb 2024	5
Hani*	01 Feb 2024	28 Feb 2024	27
Parwana*	31 Oct 2023	29 Nov 2023	29
Zahra*	27 Jan 2024	21 Feb 2024	26
Jean*	11 Jan 2024	13 Jan 2024	2
Zahra*	19 Dec 2023	22 Dec 2023	3
Bashir*	28 Nov 2023	22 Jan 2024	55
Gul*	13 Nov 2023	15 Nov 2023	2
Farhad*	01 Nov 2023	04 Dec 2023	33
Khalid*	25 Oct 2023	01 Nov 2023	7
Khalid*	03 Oct 2023	06 Oct 2023	3
Mahmoud*	19 Sep 2023	22 Sep 2023	3

²³ Article 5(1) ADET Regulation.

Mahmoud*	14 Sep 2023	19 Sep 2023	5
Mari*	05 Sep 2023	08 Sep 2023	3
Σοράγια*	04 Sep 2023	06 Sep 2023	2
Mari*	15 May 2023	17 May 2023	2
Jamila*	02 May 2023	05 May 2023	3

Source: RSA

Appointments at TAA are scheduled every day at 7am for all beneficiaries. The Unit offers no interpretation to facilitate contact between police authorities and the persons concerned, nor does it ensure special conditions for vulnerable persons.

On the day of their appointment with the Hellenic Police, the beneficiary is expected to appear in person at the Passport Office and to produce photographs, as well as a solemn declaration in Greek attesting their place of residence. The authorities shall locate the asylum decision and ADET Decision of their own motion via the “Alkyoni” database.²⁴ The beneficiary must also produce a valid International Protection Applicant Card (Δελτίο Αιτούντος Διεθνή Προστασία, DADP) in case of initial ADET issuance or their expired ADET in case of renewal.²⁵ Fingerprints are also taken at the Passport Office.²⁶

The requirement to produce a valid DADP upon submitting documents for the initial ADET grant still posed a problem for a large number of refugees in 2023 due to the inability of the Asylum Service to deliver identity documents on account of various technical difficulties such as:

- ❖ The prolonged halt of deliveries of DADP and other necessary activities of the Asylum Service for one month in view of the upgrade of its “Alkyoni II” information system. Whereas the Ministry of Migration and Asylum had declared that the database would be operational in early 2022, this process only started on 5 May 2023.²⁷
- ❖ The absence of technical specifications in “Alkyoni II” for the issuance of DADP to persons whose subsequent applications are deemed admissible.

Case study: Mahir*, a Somali national, lodged a subsequent asylum application after the rejection of his initial claim. After his subsequent application was granted by the Appeals Authority in July 2023, RAO Alimos was required to issue him a DADP in order for him to submit documents in order to obtain an ADET. In August 2023, Mahir received a document stating that “Due to a technical issue, however, the issuance of the card by the service is not possible”. The Office also advised his lawyers that the issue stemmed from the lack of related technical specifications in “Alkyoni II”. Only upon intervention from Mahir’s lawyers was he able to receive a DADP from the Controlled Temporary Reception Facility of Schisto in early September 2023.

²⁴ Article 6(1) ADET Regulation.

²⁵ *Ibid.*

²⁶ Article 7 ADET Regulation.

²⁷ RSA, ‘The upgrade of the “Alkyoni” system of the Asylum Service leaves processes and people in the air’, 31 May 2023.

Third step: ADET collection from the Asylum Service

Following the submission of documents and the taking of fingerprints at the Passport Office of the Hellenic Police, beneficiaries wait until their ADET is ready for collection at the Asylum Service. Although regulations provide that the RAO or AAU which issued the ADET Decision is competent for delivering the ADET,²⁸ the collection of residence permits in cases handled by the RAO and AAU of the Attica region is exclusively done at RAO Attica ("Katehaki") "for reasons of synergies of scale".²⁹ According to the Asylum Service, a total of 4,311 initial and renewed ADET were delivered throughout the Greek territory in January 2024.³⁰

Waiting times from the submission of documents to the TAA until the collection of the ADET from the RAO of Attica in cases supported by RSA ranged from 14 to 111 days and exceeded three months in several cases:

Waiting times from submission of documents to ADET collection			
	Submission of documents	Collection	Days
Bashir*	22 Jan 2024	14 Mar 2024	52
Parwana*	29 Nov 2023	02 Feb 2024	65
Gul*	15 Nov 2023	08 Dec 2023	23
Khalid*	01 Nov 2023	15 Nov 2023	14
Mari*	08 Sep 2023	09 Oct 2023	31
Soraya*	06 Sep 2023	26 Sep 2023	20
Mari*	17 May 2023	05 Sep 2023	111
Jamila*	05 May 2023	08 Aug 2023	95

Source: RSA

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

If people miss their appointment, the Asylum Service does not automatically reschedule an appointment for the collection of the ADET; beneficiaries have to request a new appointment. Importantly, services at the Info Point of RAO Attica are

²⁸ Article 9 ADET Regulation.

²⁹ Asylum Service, 'Ανανέωση Ταυτοποιητικών Εγγράφων Δικαιούχων Διεθνούς Προστασίας', 58515/2024, 16 February 2024, 2.

³⁰ *Ibid.*

informed of the date upon which delivery of documents is approved but not the exact date of scheduled delivery on the weekly lists.

In RSA's experience, even for people represented by a lawyer, the rescheduling of missed appointments and resolution of any issues relating to the delivery of ADET require in-person presence at RAO Attica, as these requests are not processed via phone or email.

Case study: Nasir*, a refugee from Bangladesh, has applied for an ADET since mid-November 2022 but has still not received his residence permit. His lawyers were informed by RAO Piræus in early December 2023 of a notice uploaded on "Alkyoni", per which printing of said ADET has not been approved. They were advised to refer to RAO Attica for further details. Nasir's lawyers wrote to RAO Attica in early December 2023 and then in January 2024, to no avail. Only after his lawyers appeared before RAO Attica in person was Nasir given an appointment to receive his documents in early March 2024.

The Asylum Service has recently stated that it is "Reviewing the possibility to improve presentation and search of information on ADET and TDV ready for delivery, as well as other means for the rescheduling of missed appointments in cooperation with competent services of the Ministry".³¹ The authorities have not provided additional information to date on any consideration of measures to improve the process of ADET delivery.

Protracted waiting periods without identity documents

In light of the above systemic deficiencies in the process of issuance and renewal of ADET, beneficiaries of international protection, including returnees from other European countries, remain without identity documents for several months, despite concerns raised by the Ombudsman,³² the National Commission for Human Rights (NCHR),³³ the European Commission,³⁴ the EUAA³⁵ and EU Member State authorities.³⁶

The Asylum Service notes that "there is a delay of 6 months in the process of renewing resident permits"³⁷ on account of serious delays linked mainly to the stage of processing of applications at the AAU Beneficiaries of International Protection. Waiting times in cases supported by RSA exceed one year, however:

³¹ *Ibid*, 3.

³² Ombudsman, 'Καθυστερήσεις πλέον του έτους στη διαδικασία ανανέωσης Α.Δ.Ε.Τ. σε υπόθεση δικαιούχου διεθνούς προστασίας', 316047/64653/2022, 28 November 2022.

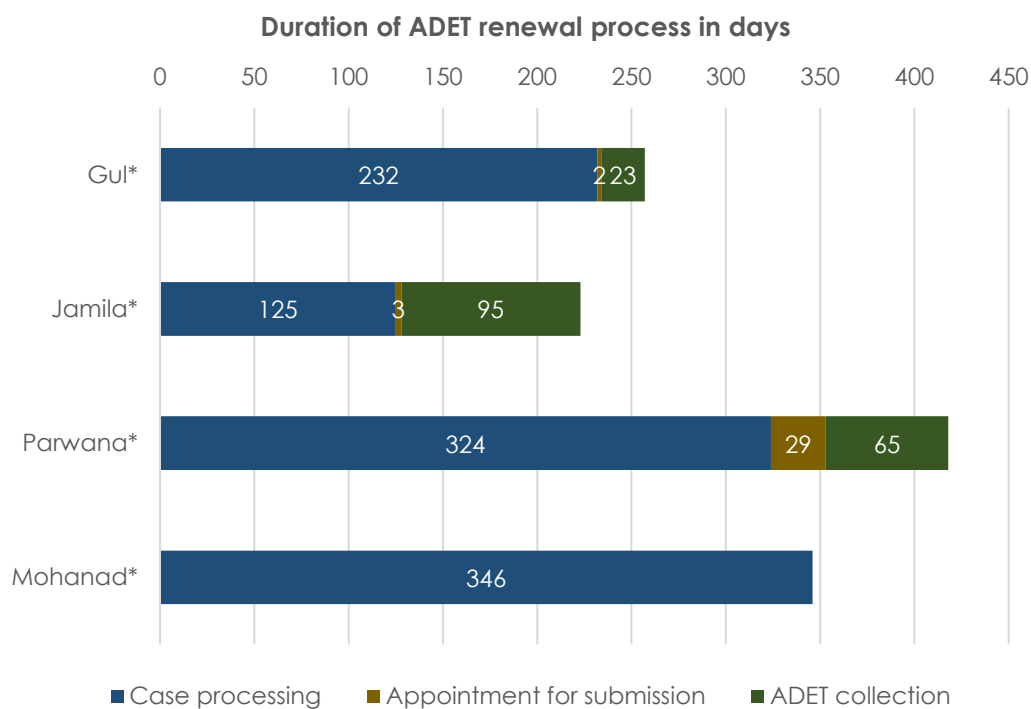
³³ NCHR, 'Επιστολή της ΕΕΔΑ προς τα συναρμόδια Υπουργεία για το θέμα της ανανέωσης των αδειών διαμονής δικαιούχων διεθνούς προστασίας', 27 July 2021, available [here](#).

³⁴ European Commission, *Operational conclusions – 12th Steering Committee meeting for migration management*, Ares(2023)3222469, 25 April 2023; *Task Force Migration Management Mission Report – Athens/Lesvos/Evros – July 2022*, Ares(2022)5049125; Letter No Ares(2021)8048555, 7 December 2021, available [here](#).

³⁵ EUAA, *Residence permits and travel documents for third-country nationals in the context of asylum*, EUAA/2023/23, November 2023, available [here](#).

³⁶ Government of the Netherlands, 'Kamerbrief over diverse onderwerpen migratiebeleid', 7 November 2022.

³⁷ European Commission, *Operational Conclusion 13th Steering Committee for Migration Management*, Ares(2023)8358057, 28 September 2023, 4.



Source: RSA. In Mohanad*'s case, the ADET Renewal Decision is still pending.

Contact with the AAU Beneficiaries of International Protection throughout the lengthy process of ADET renewal is particularly difficult even for beneficiaries represented by a lawyer. In cases supported by RSA, written requests sent by lawyers via email to the AAU Beneficiaries of International Protection receive a reply with a delay of up to two or three months. Phone calls are not answered in most cases.

Until they obtain their first ADET, the person retains their DADP and may renew it if it has expired.³⁸ However, this does not apply to renewal of an expired ADET, in which case persons receive no documentation upon submission of the application and until the delivery of the new ADET and have no means to demonstrate their status.

According to the ADET Regulation, "Upon request... the competent ADET issuing service issues a certificate of submission of an application and necessary documents for the grant of ADET."³⁹ Furthermore, the Asylum Service issues a "certificate of beneficiary of refugee status" or a "certificate of beneficiary of subsidiary protection" upon request to the RAO or AAU which issued the initial ADET Decision – not the AAU for Beneficiaries of International Protection where the ADET renewal application is addressed. However, this certificate may not be issued before the renewal application has been registered and uploaded on the "Alkyoni" database. This often takes weeks or even months, as discussed above.

³⁸ DADP do not indicate that international protection has been granted, however.

³⁹ Article 13 ADET Regulation.

Disparities persist in the contents of certificates issued by the RAO and AAU of the Asylum Service even within the Attica region.⁴⁰ Specifically, in cases supported by RSA:

- ❖ **RAO Piraeus:** Certificates indicate the date of submission of the ADET renewal application but not the date of registration. Certificates are valid for six months.
- ❖ **RAO Alimos:** Certificates only indicate the date of registration of the renewal application, not the date of submission. Certificates of RAO Alimos are valid for six months.
- ❖ **RAO Attica:** Certificates indicate the date of submission of the ADET renewal application but not the date of registration. These certificates too are valid for six months.
- ❖ **AAU Fast-Track:** Certificates explicitly indicate both the date of submission and the date of registration of the ADET renewal application. Certificates of the Unit, however, are valid only for three months.

These Asylum Service certificates no longer mention the beneficiary's right to access all rights enjoyed prior to the expiry of the ADET. However, even under their previous form and the express mention of access to "the same rights and obligations held prior to the expiry of the ADET", the certificates were not accepted by public authorities and services as proof of asylum status when dealing with people awaiting the renewal of their ADET.⁴¹

In addition to denial of socio-economic rights, these deficiencies restrict the right to legal representation as they effectively prevent beneficiaries of international protection from granting authorisation (*εξουσιοδότηση*) to a lawyer, since they cannot fulfil the requirement of certification of their signature (*θεώρηση του γνησίου της υπογραφής*) before a public authority in line with the Code of Administrative Procedure for want of valid documentation.⁴²

The Asylum Service has recently noted that an impending legislative reform is to provide for the submission of ADET renewal applications via a special online platform and for the automatic delivery of a certificate attesting the pending renewal. The Asylum Service has also referred to upcoming legislative and regulatory measures aimed at defining specific standards for certificates to ensure that personal data and authenticity of the documents can be verified, in line with standards set out in the Migration Code, and that documents are accepted by third parties.⁴³

⁴⁰ Ombudsman, "Ελλειψη ομοιομορφίας μεταξύ των βεβαιώσεων δικαιούχων διεθνούς προστασίας που εκδίδονται από τα κατά τόπους αρμόδια Π.Γ.Α./Α.Κ.Α. Αττικής", 316047/65864, 2 December 2022.

⁴¹ Ombudsman, "Ισχύς των βεβαιώσεων δικαιούχων διεθνούς προστασίας εκκρεμότητας της διαδικασίας ανανέωσης αδειών διαμονής αναφορικά με τη πρόσβαση σε δικαιώματα", 316047/66289, 5 December 2022.

⁴² Article 11(1) L 2690/1999, as amended by Article 93 L 4962/2022.

⁴³ Asylum Service, 'Ανανέωση Ταυτοποιητικών Εγγράφων Δικαιούχων Διεθνούς Προστασίας', 58515/2024, 16 February 2024, 2-3.

Finally, the Asylum Code provides that the start of validity of the ADET corresponds to the date of issuance of the ADET Decision by the Asylum Service for initial permits and to the date of expiry of the previous ADET for renewals,⁴⁴ not to the date of actual delivery of the (new) ADET. This creates a serious risk especially for subsidiary protection holders whose ADET are valid for one year,⁴⁵ given that they are handed ADET near expiry or already expired and in need of immediate renewal in view of the delays described above.

Drawing on the above observations, we conclude that beneficiaries of international protection in Greece face an array of administrative barriers, a lack of clear information and slow processing times at the different stages of the ADET issuance and/or renewal procedure. As a result, beneficiaries are liable to face particularly lengthy periods without a valid ADET, in the absence of which they cannot access social benefits, health care, the labour market, or even authorise a legal representative. Recommendations by RSA on measures to streamline the process for issuing and renewing ADET have not been taken up by the government to date.⁴⁶

Other documents

Travel document

Travel documents (*titre de voyage*, TDV) are a prerequisite for opening a bank account in Greece, as banks do not accept ADET as valid identification documents for beneficiaries of international protection who wish to open a bank account. Possession of a travel document is also needed for one to use the online services of the Independent Authority for Public Revenue (*Ανεξάρτητη Αρχή Δημοσίων Εσόδων*, AADE) for acts such as obtaining a Tax Identification Number (*Αριθμός Φορολογικού Μητρώου*, AFM), as well as for access to employment, since the Unified Social Security Fund (*Ενιαίος Φορέας Κοινωνικής Ασφάλισης*, EFKA) does not accept ADET as a valid documentation for registration of insured persons and the grant of a Social Security Member Registration Number (*Αριθμός Μητρώου Ασφαλισμένου*, AMA).

According to the Refugee Convention, the Qualification Directive and the Asylum Code, refugees are entitled to travel documents except where “compelling reasons of national security or public order” arise.⁴⁷ Similar conditions apply to the grant of ADET to beneficiaries of international protection.⁴⁸

The procedure for the issuance of travel documents is governed by the Travel Documents Regulation, adopted based on Article 24 of the Asylum Code.⁴⁹ The Regulation, however, provides that “A travel document shall not be granted to a person who: a) has been convicted by final decision for forgery, forgery of certificates,

⁴⁴ Article 23(1) Asylum Code. Note, however, that according to Ministry of Migration and Asylum Circular 68883/2023 the rule only applies to the first renewal.

⁴⁵ Article 23(1) Asylum Code.

⁴⁶ RSA, *Παρατηρήσεις επί του Σχεδίου Εθνικής Στρατηγικής για την Ένταξη*, January 2022, 4-8, available [here](#).

⁴⁷ Article 28(1) Refugee Convention; Article 25(1) Qualification Directive; Article 24(1) Asylum Code.

⁴⁸ Article 24(1) Qualification Directive.

⁴⁹ Travel Documents Regulation, JMD 10302/2020, Gov. Gazette B' 2036/30.05.2020.

embezzlement of documents, false deposition without oath or false declaration (articles 216, 217, 222 and 225 of the Criminal Code and article 22(6) L 1599/1986) where commission is related to the issuance, use, loss or theft of a passport, an identification document or any other document that may be used as a travel document or for criminal organisation, terrorist acts, abduction, slave trade, trafficking in human beings, child abduction, involuntary kidnapping, trafficking (articles 187, 187A, 322, 323, 323A, 324, 327, 351 of the Criminal Code) as well as the offences of Article 29(5), (6) and (7) and of Article 30(1) and (2) of [the Immigration Code]. The prohibition shall apply from the final convicting judgment for five years (5) as regards commission of the above misdemeanours and for ten (10) years as regards commission of a felony respectively, on condition that the sentence imposed has been commuted; b) has been the subject of a criminal charge for a felony or an offence of point (a) for the duration of proceedings..."⁵⁰ Decisions of RAO and AAU refusing the grant of a travel document may be appealed before the Director of the Asylum Service who takes a decision based on a recommendation of a three-member panel.⁵¹

In practice, the aforementioned provision leads to denials of travel documents to refugees who face charges or convictions with a suspended sentence for misdemeanours such as use of forged travel documents, without "compelling reasons of national security or public order" being established. The very same refugees have received ADET from Greece. In a recent judgment, the Administrative Court of Athens held that denying travel documents to refugees solely based on the commission of offences such as use of false documents without establishing compelling reasons of national security or public order is unlawful.⁵²

Beneficiaries of international protection submit documents and fingerprints for the issuance of travel documents to the Passport Offices of the Hellenic Police,⁵³ after requesting an appointment with the territorially competent office, similar to the process applicable for ADET. An additional condition for requesting an appointment for travel documents is the payment of a fee. Travel documents printed by the TAA are exclusively collected at RAO Attica, similar to the above-described collection process for ADET.

Beneficiaries of international protection wishing to renew their travel documents must submit an application form and a digital photograph to the gas.traveldoc@migration.gov.gr email address of the AAU Beneficiaries of International Protection.⁵⁴ They are also required to submit a solemn declaration attesting that they have not committed any of the criminal offences listed in Article 1(2) of the Travel Documents Regulation,⁵⁵ even though these cases too are subject to a background check by the Asylum Service.

⁵⁰ Article 1(2) Travel Documents Regulation.

⁵¹ Article 4(3) Travel Document Regulation.

⁵² Administrative Court of Athens, 1550/2023, 22 December 2023, para 9.

⁵³ Article 3 Travel Documents Regulation.

⁵⁴ Article 7(2) Travel Documents Regulation.

⁵⁵ Article 7(3) Travel Documents Regulation.

No more than two officials of the AAU Beneficiaries of International Protection are entrusted with the task of processing travel document renewal applications.⁵⁶ Accordingly, here too the renewal process is marred by protracted delays akin to those described above as regards ADET. Waiting times may exceed one year in cases supported by RSA:

Case study: Gul* and her husband, refugees from Afghanistan and parents of four children, applied for the renewal of the passports of the entire family in October 2022. Their children received “TDV Renewal Decisions” by the AAU Beneficiaries of International Protection in April, October and November 2023. However, the approval of renewal of the parents’ passports has been pending for over sixteen months to date.

Case study: Nasim*, a refugee from Syria, was returned to Greece from **Germany** in March 2022. At the end of June 2023, he applied for the renewal of his passport, expiring in July 2023. Nasim has not heard back from the AAU Beneficiaries of International Protection to date, eight months after his application.

Tax Identification Number (AFM)

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

Individuals wishing to register with a Tax Office (*Διεύθυνση Οικονομικών Υποθέσεων*, DOY) with a view to obtaining AFM are required to certify their residence address through a certificate from a reception centre, an electricity bill or a copy of a rental contract in their name. Accordingly, beneficiaries of international protection who do not hold a residence certificate and/or are homeless are unable to obtain AFM. As a result, they cannot submit a tax declaration or obtain a tax clearance certificate.

AFM is obtained following an online request to AADE. The AADE platform is only available in Greek and requires a valid identification document. The platform accepts travel documents but not ADET or DADP. Therefore, beneficiaries who lack a valid passport cannot request an appointment to receive AFM.

⁵⁶ Asylum Service, ‘Ανανέωση Ταυτοποιητικών Εγγράφων Δικαιούχων Διεθνούς Προστασίας’, 58515/2024, 16 February 2024, 2.

Pursuant to an AADE Decision, asylum seekers completing the lodging of their asylum application automatically receive an AFM upon the delivery of DADP.⁵⁷ Asylum authorities complete the AFM issuance procedure online and issue an AFM certificate (*Βεβαίωση Απόδοσης ΑΦΜ*) to the applicant.⁵⁸ This is not, however, the case for persons holding an ADET who lack such a number – and whom the Asylum Service refers to the DOY.

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

TAXISnet credentials

Online login credentials (*κλειδάριθμος*), also known as “TAXISnet” codes, are necessary for receiving tax clearance. The credentials are also necessary for persons who have AFM but do not hold their AFM certificate. Applications for credentials also have to be filed to AADE online, as described above. Following the application, the person attends their appointment with the competent DOY to receive their credentials. As noted above, the AADE platform is only available in Greek.

Social Security Number (AMKA)

AMKA is a prerequisite for access to both health care and the labour market. According to the new AMKA Regulation entering into force in December 2023, the grant of AMKA is conditioned upon possession “valid residence title in the country with labour market access”.⁵⁹ Asylum seekers are not eligible for AMKA but obtain a Provisional Foreigner's Insurance and Health Care Number (*Προσωρινός Αριθμός Ασφάλισης και Υγειονομικής Περίθαλψης Αλλοδαπού, ΠΑΑΥΠΑ*).⁶⁰ This number shall be converted into AMKA within one month of the delivery of the ADET.⁶¹ The conversion does not happen automatically; beneficiaries must appear before a Citizens Service Centre (*Κέντρο Εξυπηρέτησης Πολιτών, ΚΕΠ*) in order to obtain their AMKA.⁶²

The requirement of a “valid” residence permit creates substantial obstacles, given that AMKA is deactivated upon interruption of lawful residence in the country. “Specifically as regards deactivation due to non-legal residence in the country, [deactivation] shall automatically take place on the day following the expiry of validity of the residence title, in the absence of renewal, extension or withdrawal of the status of international or temporary protection”.⁶³

Therefore, the systematic protracted delays in the ADET renewal procedure carry risks of deactivation of AMKA for beneficiaries of international protection through no fault

⁵⁷ Articles 1(3) and 8 AADE Decision A1270/2020, Gov. Gazette B' 5508/14.12.2020.

⁵⁸ Article 2(1) AADE Decision A1270/2020.

⁵⁹ Article 3(a) AMKA Regulation, JMD Φ80320/109864/2023, Gov. Gazette B' 7280/22.12.2023.

⁶⁰ Article 59(2) Asylum Code; Article 1(2) PAAYPA Regulation.

⁶¹ Article 8(1) PAAYPA Regulation.

⁶² Article 8(2) PAAYPA Regulation.

⁶³ Article 7(2) JMD Φ80320/109864/2023.

of their own. This has serious repercussions on their access even to acquired rights and benefits such as employment or health care.

Housing

HELIOS and housing programmes

The “Hellenic Integration Support for Beneficiaries of International Protection and Beneficiaries of Temporary Protection” (HELIOS)⁶⁴ is implemented by the International Organisation for Migration (IOM) in partnership with several non-governmental organisations. From 2022 onwards, the programme is temporarily funded by the national budget pending its inclusion in the European Social Fund +, and is “implemented through successive extensions”, the latest – ninth – prolonging its implementation until end of June 2024.⁶⁵

The need to secure extensions of the programme under national funding through successive amendments to the framework agreement⁶⁶ has resulted in interruption of HELIOS for a significant period of time,⁶⁷ especially during the last months of 2023. Specifically, the programme was abruptly halted as of 1 October 2023, resumed for a brief period and was interrupted again in November. As a result, the programme did not accept new enrolments of recognised refugees, as highlighted in responses to enrolment requests by RSA clients. Indicatively, only 30 people enrolled on the programme in the last quarter of 2023 according to IOM statistics.

Case study: Farzana*, her sister and father were recognised as refugees in the fall of 2023, as stated above. Following a request from their lawyers for their enrolment on HELIOS, they were informed by IOM in early November that “from 1 November 2023 to 30 November 2023 no new enrolments on the HELIOS programme and new submissions of rental agreements are accepted until further notice”. In response to a new request was submitted one month later, the family was informed that “the programme is extended until 31 December 2023. Until confirmation of the continuation of the programme from 1 January 2024 onwards, the provision of certain programme services such as integration courses and acceptance of new rental agreements shall remain inactive”.

Enrolment on HELIOS has to be done within one year of the notification of a positive asylum decision.⁶⁸ Eligibility for enrolment on HELIOS is subject to the following criteria: (a) recognition as a refugee or beneficiary of subsidiary protection after 1 January 2018; and (b) official registration and residence in the reception system, i.e. in camps such as Reception and Identification Centres (RIC), Closed Controlled Access Centres (CCAC) or Controlled Temporary Reception Facilities (CTRF), or official municipality shelters or other housing programmes e.g. for victims of trafficking, or a pre-removal

⁶⁴ Ministry of Migration and Asylum, *Πρόγραμμα HELIOS*, available [here](#).

⁶⁵ Ministry of Migration and Asylum, *Περίληψη 9ης Τροποποίησης της Προγραμματικής Συμφωνίας HELIOS*, 39917/2024, 24 January 2024, available [here](#).

⁶⁶ Namely, Ministry of Migration and Asylum, Reply to parliamentary question, 515151/2023, 22 November 2023, available [here](#).

⁶⁷ RSA, ‘Recognised refugees in Greece left without even minimal support after new interruption of HELIOS programme’, 22 January 2024, available [here](#).

⁶⁸ IOM, *HELIOS – Project Regulations Handbook*, January 2024, available [here](#).

detention centre at the time of notification of a positive decision on their asylum claim. In light of this, beneficiaries of international protection who were not in Greece upon the approval of their asylum application or who have held international protection for over one year are not eligible for enrolment on the HELIOS programme.

According to IOM statistics, 45,688 beneficiaries of international and temporary protection had been registered on the HELIOS programme from its launch to 29 February 2024. 14% of the total enrolments concern Ukrainian nationals covered by temporary protection.⁶⁹

HELIOS does not offer accommodation *per se*. It offers rental subsidies to assist beneficiaries in finding an accommodation place, upon condition they already hold a rental agreement of a duration exceeding six months and a bank account. Assistance under HELIOS is offered for a period of six to twelve months, depending on the date of submission or the necessary documents. The level of the rental subsidy ranges from 230 € for a single adult to 800 € for a six-member family. In addition to a monthly subsidy, beneficiaries receive retroactively a one-off sum ranging from 350 € to 1,150 € to cover the rental deposit and cover settling-in expenses they need in order to rent property.⁷⁰

Beyond the precondition of possession of AFM and a bank account, access to housing is marred by severe barriers as described in previous reports, including discrimination and a lack of affordable housing. In 2024 too, constantly rising rent prices are reported due to high demand, particularly in the Attica region.⁷¹ In addition to rent, beneficiaries have to cover utility bills and other expenses such as food on their own means. Therefore, the HELIOS rent subsidy alone is often insufficient to ensure their subsistence.

From its launch to 29 February 2024, HELIOS has provided rental subsidies to 10,133 households, totalling 23,459 beneficiaries. There is no available breakdown of rental subsidies by duration. Rental subsidies under HELIOS are available for a maximum of twelve months, as described above. Over 20,000 beneficiaries who had previously been included in the programme have stopped receiving rental subsidies, since the number of households currently benefitting from HELIOS subsidies is 1,612, corresponding to 2,961 persons.⁷² Importantly, Greece granted international protection to 25,813 people in 2023 alone and had 26,848 registered beneficiaries of temporary protection at the end of the year.⁷³

Homelessness and destitution

High risks of homelessness and destitution persist among people granted international protection in Greece, given that access to the necessary documents and resources to secure accommodation is not possible within the 30-day deadline left to persons to vacate their reception places in Greek camps (RIC, CCAC, CTRF) upon obtaining

⁶⁹ IOM, *HELIOS Factsheet*, 29 February 2024, available [here](#).

⁷⁰ IOM, *HELIOS – Project Regulations Handbook*, January 2024, 5.

⁷¹ Athens Voice, 'Ραγδαίες αυξήσεις των τιμών πώλησης ακινήτων στην Αττική - Έως 62% άνοδο οι τιμές των ενοικίων', 31 January 2024, available [here](#).

⁷² IOM, *HELIOS Factsheet*, 29 February 2024.

⁷³ Ministry of Migration and Asylum, *Statistics*, December 2023, available [here](#).

international protection.⁷⁴ Refugees supported by RSA have faced forced departure from camps managed by the Reception and Identification Service (RIS) of the Ministry of Migration and Asylum and have ended up homeless without means of subsistence, even in particularly vulnerable cases:

Case study: Mari* and her daughter are refugees from Afghanistan and survivors of serious forms of sexual violence in Greece. After being granted refugee status and receiving their ADET and travel documents, they were forced in mid-October 2023 to vacate the Controlled Temporary Reception Facility of Malakasa where they resided. They left without being given enough time to collect the daughter's clothes, school supplies and toys. Mari and her child ended up homeless in Athens and had no access to stable shelter for the remainder of their time in Greece. They lodged a complaint with the Fundamental Rights Officer of the Ministry of Migration and Asylum in October 2023 which was transmitted in mid-November 2023 to the General Secretary for Reception of Asylum Seekers under the same Ministry.

In mid-March 2024, the Fundamental Rights Officer informed Mari of the response given by the Reception and Identification Service of the same Ministry on her complaint in mid-February 2024. This response states that "The complainants arrived in RIC Malakasa on ...03/2023 and departed from the RIC on .../10/2023 after receiving their travel documents. The response refers to article 109 par. 1 of [the Asylum Code], which provides that material reception conditions in financial allowances and in kind are terminated upon issuance of a decision granting refugee status or subsidiary protection".

Even beneficiaries of international protection who have gone through the HELIOS programme are yet again at risk of homelessness after their rental subsidies come to an end. As mentioned above, over 20,000 people have ceased receiving the subsidies. These persons are unable to continue renting property and most end up homeless on the streets.

⁷⁴ Article 109(1) Asylum Code.

Drawing on the above, we come to the conclusion that beneficiaries of international protection, including those returned to Greece from other countries, continue to run a real risk of destitution, extreme material deprivation and a complete lack of accommodation engaging Article 3 ECHR and Article 4 of the EU Charter. This is confirmed by several cases of status holders returned from other European countries and represented by RSA, who are faced with protracted homelessness and destitution.



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