

REPORT

Refugee camps in mainland Greece

JUNE 2024

What is the current situation based on actual conditions and official data?

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Introduction*

The Greek government has made reception of asylum seekers in camps isolated from local communities a centrepiece of its policy choices over the past years. This policy already took form in 2021, when the Ministry of Migration and Asylum announced “state-of-the-art closed controlled centres that will operate on the islands and the mainland”¹ and declared that material reception conditions will only be provided to those residing in centres it manages.² It was crystallised in 2022 with the rebranding of all mainland camps into “Controlled Reception Centres for asylum seekers”³ and the complete closure of the ESTIA programme, a tested, successful approach to dignified reception of asylum seekers which in the last seven years had offered decentralised accommodation in apartments and support services to thousands of people, many of them vulnerable.⁴

Camps are currently the only form of reception offered to asylum seekers in Greece. The Greek government noted in its plan to upgrade “controlled” camps throughout the country that “Emphasis, beyond security, shall be placed on the quality of services offered to third-country nationals based on international standards”.⁵ By the end of June 2024, the same government will be reporting on the quality of camp services and measures to address gaps therein to the Committee of Ministers of the Council of Europe, responsible for supervising the execution of European Court of Human Rights (ECtHR) judgments.⁶ We recall that Greece continues to receive condemnations from the ECtHR for inhuman and degrading living conditions of refugees,⁷ thirteen years after the seminal ruling in *M.S.S. v. Belgium and Greece*.⁸ The European Commission also monitors the country’s compliance with its EU and domestic legislation on asylum in the context of infringement proceedings initiated in 2009 and pending to date.⁹

* Names have been changed to protect privacy and safety.

¹ Greek Government, *Ενοποιημένο Σχέδιο Κυβερνητικής Πολιτικής 2021*, 20 December 2020, 55, available [here](#).

² Ministry of Migration and Asylum, ‘Καταργείται από 1/7/21 το οικονομικό βοήθημα σε αιτούντες διεθνή προστασία που δε στεγάζονται σε δομές ευθύνης του Υπουργείου Μετανάστευσης και Ασύλου ή συνεργαζόμενους με το ΥΜΑ φορείς’, 15 April 2021, available [here](#). The Ministry ended the operation of smaller facilities at that time: RSA, ‘Another dignified reception facility shut down’, 24 April 2021, available [here](#).

³ Articles 13 and 14 PD 77/2022, Gov. Gazette A’ 212/17.1.2022.

⁴ RSA, ‘On the termination of the ESTIA II housing programme for asylum applicants’, 22 December 2022, available [here](#). See also RSA & PRO ASYL, *Structural failure: Why Greece’s reception system failed to provide sustainable solutions*, June 2019, available [here](#).

⁵ Greek Government, *Ενοποιημένο Σχέδιο Κυβερνητικής Πολιτικής 2023*, 21 December 2022, 170, available [here](#).

⁶ Council of Europe Committee of Ministers, *M.S.S. group (Application No. 30696/09) and Rahimi (Application No. 8687/08) v. Greece*, CM/Del/Dec(2023)1475/H46-15, 21 September 2023, para 5.

⁷ For instance, *A.D. v. Greece* App No 55363/19, 4 April 2023; *E.F. v. Greece* App No 16127/20, 5 October 2023; *M.B. v. Greece* App No 8389/20, 23 November 2023; *M.L. v. Greece* App No 8386/20, 23 November 2023; *D.S. v. Greece* App No 2080/19, 30 November 2023; *O.R. v. Greece* App No 24650/19, 23 January 2024.

⁸ App No 30696/09, 21 January 2011.

⁹ INFR(2009)4104. According to the European Commission database, letters of formal notice have been sent to Greece on 29 September 2009, 24 June 2010 and 23 September 2015 *inter alia* on reception

Greece's encamped reception system is underpinned by inadequate reception conditions in sites isolated from urban centres and with difficult access thereto. It also presents serious issues regarding the protection of asylum seekers' physical and mental health, compounded by severe staffing shortages, failure to disburse financial allowances to the majority of applicants and the absence of appropriate measures to assist the integration of beneficiaries of international protection into the broader society.

These conditions are documented in our report through the cases of people legally represented by Refugee Support Aegean (RSA) in mainland camps such as Ritsona, Thiva, Malakasa and Corinth. The report also draws on official data of the Greek authorities on the reception systems and on documents granted by the European Commission upon request for public access. Issues relating to access to education and to reception of unaccompanied children are not covered in the report.

Capacity and occupancy of mainland camps

The Greek mainland comprises a total of 27 camps managed by the Reception and Identification Service (RIS) of the Ministry of Migration and Asylum. These take the form of Controlled Reception Centres for asylum seekers (CTRC), divided into twelve "Northern Greece Centres" and twelve "Southern Greece Centres",¹⁰ and three camps operating as Reception and Identification Centres (RIC): Malakasa, Diavata and Fylakio.¹¹ Our report discusses the conditions prevailing in mainland camps primarily based on geographical location, regardless of type of facility (RIC, CTRC).

The nominal capacity of the camps differs from their actual ("functional") capacity, often lower for several. The Greek authorities note that "real capacity will never reach full nominal capacity of 40 000 places because there are constraints (such as natural loss)"¹² owed to damaged and non-functional infrastructure or to allocation of rooms to groups below their total capacity e.g. in the case of families.¹³

According to official Ministry of Migration and Asylum data, the reception system on the mainland counted 22,960 reception places and a nominal capacity of 26,051 places at the end of 2023.

The thirteen Southern Greece camps are ordered by size as follows:

conditions: European Commission, 'More Responsibility in managing the refugee crisis: European Commission adopts 40 infringement decisions to make European Asylum System work', IP/15/5699, 23 September 2015, available [here](#).

¹⁰ Articles 35 and 36 PD 106/2020, as amended and in force, Gov. Gazette A' 255/23.12.2020.

¹¹ Article 34(a), (h) and (i) PD 106/2020. Malakasa comprises of two separate camps: "Malakasa I" operates as a CTRC and "Malakasa II" as a RIC.

¹² European Commission, *Operational Conclusion 13th Steering Committee for Migration Management*, Ares(2023)8358057, 28 September 2023, 3.

¹³ European Commission, Email correspondence: 'Summary of meeting with SG Iatridis 07/09/23', Ares(2023)8358100, 8 September 2023.

Capacity of Southern Greece Camps		
Camp	Nominal	Actual
RIC & CTRC Malakasa	3,471	3,021
CTRC Ritsona	2,988	2,884
CTRC Koutsochero	1,748	1,408
CTRC Schisto	1,509	1,004
CTRC Thiva	1,014	894
CTRC Corinth	896	876
CTRC Kyllini	486	474
CTRC Thermopyles	436	410
CTRC Oinofyta	412	412
CTRC Pyrgos	200	200
CTRC Elefsina	180	180
CTRC Volos	148	150
CTRC Attiko Alsos	100	100
Total	13,588	12,013

Source: Ministry of Migration and Asylum, Reply to parliamentary question, 5 Mar 2024, available [here](#)

The fourteen Northern Greece camps are ordered by size as follows:

Capacity of Northern Greece Camps		
Camp	Nominal	Actual
CTRC Polykastros	1,680	1,660
CTRC Serres	1,578	1,578
CTRC Katsikas	1,534	1,096
CTRC Kavala	1,134	1,039
RIC & CTRC Diavata	936	768
CTRC Filippiada	808	490
CTRC Alexandria	802	721
CTRC Vagiochori	786	786
CTRC Sintiki	750	595
CTRC Lagadikia	654	581
CTRC Drama	526	526
CTRC Veria	483	420
CTRC Agia Eleni	462	357
RIC Fylakio	330	330
Total	12,463	10,947

Source: Ministry of Migration and Asylum, Reply to parliamentary question, 5 Mar 2024

The ten largest CTRC are Malakasa, Ritsona, Polykastros (also known as “Nea Kavala”), Serres, Koutsochero, Katsikas, Kavala, Schisto, Thiva and Corinth.

At the end of last year, mainland camps hosted a total of 16,911, i.e. ran at 73.7% of their full actual capacity. The number of residents in the largest mainland camps fluctuated as follows throughout 2023:

Occupancy of ten largest CTRC by month: 2023												
Camp	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Malakasa	890	1,172	1,509	647	387	607	746	1,581	2,479	2,398	2,649	2,901
Ritsona	1,644	1,196	1,267	1,225	1,202	1,249	1,276	1,350	1,539	2,052	2,153	2,291
Polykastro	596	539	475	430	420	762	1,048	1,033	1,357	1,317	1,266	1,206
Serres	1,029	962	769	638	738	1,295	1,490	1,659	1,038	1,502	1,461	1,244
Koutsochero	655	577	521	482	538	585	605	841	0	0	0	0
Katsikas	813	807	727	687	693	739	770	785	919	937	912	940
Kavala	379	425	371	331	397	339	539	698	679	915	905	913
Schisto	661	693	657	649	585	621	618	598	632	896	792	872
Thiva	257	218	201	196	320	232	286	504	639	673	629	594
Corinth	414	427	415	399	348	350	337	443	712	714	681	707

Source: JMD 527692/2023; JMD 87298/2024. Certain occupancy data for December 2023 differ from those provided by the Ministry of Migration and Asylum in reply to a parliamentary question.

CTRC Ritsona merits particular consideration. Based on the above official figures, Ritsona has consistently accommodated more than a thousand residents during the year and has exceeded two thousand inhabitants. Various security and violence incidents have been reported in the camp over the past year.¹⁴

Available reception conditions

Asylum seekers are entitled to reception conditions from the moment they “make” an oral or written application for international protection in Greece until a final decision is taken thereon.¹⁵ These include “material reception conditions”¹⁶ offered by the RIS to those residing in the Greek reception system, i.e. in Closed Controlled Access Centres (CCAC), RIC or CTRC. Material reception conditions comprise of accommodation, food, clothing and an allowance for daily expenses. The majority of asylum seekers in Greece are in fact within the country’s reception

¹⁴ Enia Thema, ‘Ριτσώνα: Άγρια συμπλοκή μεταξύ μεταναστών στην δομή φιλοξενίας – Ένας τραυματίας στο Νοσοκομείο’, 28 January 2024, available [here](#); ‘Ριτσώνα: Άγρια συμπλοκή μεταξύ μεταναστών στην δομή φιλοξενίας – Ένας τραυματίας στο Νοσοκομείο’, 27 January 2024, available [here](#); I Efimerida, ‘Συμπλοκές στη δομή φιλοξενίας της Ριτσώνας -Στο σημείο ισχυρές δυνάμεις της ΕΛ.ΑΣ.’, 8 January 2024, available [here](#); Athens Voice, ‘Συνεχίζεται η αναζήτηση 17χρονης που εξαφανίστηκε από δομή φιλοξενίας προσφύγων στη Ριτσώνα’, 29 May 2023, available [here](#); Lifo, ‘Ριτσώνα: 11χρονη που διαμένει στη δομή προσφύγων καταγγέλλει απόπειρα βιασμού από 6 άτομα’, 28 March 2023, available [here](#); Alfanita, ‘Ριτσώνα: Άγριος ξυλοδαρμός μετανάστη σε Δομή Φιλοξενίας’, 16 March 2023, available [here](#).

¹⁵ Articles 1(c), (g) and 69(8) Greek Asylum Code; Article 17(1) Reception Conditions Directive.

¹⁶ Article 1(h) Greek Asylum Code.

system: out of 32,730 persons with pending asylum cases at the end of last year, 25,484 – more than ¾ – resided in RIS camps.

The conditions offered by the state must guarantee asylum seekers “an adequate standard of living, which guarantees their subsistence and protects their physical and mental health based on respect for human dignity”.¹⁷ Greek law further provides that material reception conditions are granted by the RIS “upon condition that applicants are not employed or that their employment does not provide sufficient income”.¹⁸

Housing

Most mainland camps offer accommodation in the form of containers housing one or more family units. Certain camps such as CTRC Thiva or CTRC Ritsona combine accommodation in containers with building or pre-fabricated units. CTRC Corinth has peculiar characteristics since it offers housing in large rub-halls, each comprising of twenty small “rooms”. These spaces are “particularly small for accommodation of more than one person e.g. in the case of families”.¹⁹ Rooms inside the rub-halls have no access to natural light. Windows are placed on the side of the corridor and are thereby usually covered. Rub-halls are not equipped with showers, bathrooms or kitchens.

Maintenance and security in mainland camps (facilities management) are implemented by private companies under a programme funded by the EU Asylum, Migration and Integration Fund (AMIF) 2021-2027.²⁰ Yet, infrastructure is severely damaged and requires maintenance and repair “almost for all the camps”.²¹ In April 2023, the European Commission indicated to the Ministry of Migration and Asylum that “several places in the mainland sites are not available to support reception needs due to technical issues linked to the absence of maintenance and repairs” and urged the Greek authorities “to attend to the urgent maintenance and repair needs of the MPRICs and mainland sites”.²²

Case study: Farzana*, her minor sister and their father are a single-parent family of refugees from Afghanistan with recorded psychiatric and orthopaedic issues. In September 2023 they were transferred from CTRC Koutsochero to **CTRC Corinth** and were placed in a small room facing an open corridor inside a rub-hall, without a bathroom, shower or kitchen for private use and without access to natural lighting. The room offered to them has not been adequately maintained – damaged walls and window, no secure lock. Rooms inside the rub-hall have no soundproofing.

¹⁷ Article 59(1) Greek Asylum Code.

¹⁸ Article 59(3) Greek Asylum Code.

¹⁹ Ombudsman, *The Challenge of Migratory Flows and Refugee Protection*, April 2024, 27, available [here](#).

²⁰ TAMEY, *Παροχή Υπηρεσιών Διαχείρισης Εγκαταστάσεων (Facilities Management) Στις Δομές Φιλοξενίας Ενδοχώρας Της Υπηρεσίας Υποδοχής Και Ταυτοποίησης Του Υπουργείου Μετανάστευσης Και Ασύλου (Μη Συμπεριλαμβανομένου Του ΚΥΤ Φυλακίου)*, available [here](#), [here](#) and [here](#).

²¹ Ombudsman, *The Challenge of Migratory Flows and Refugee Protection*, April 2024, 27.

²² European Commission, Email correspondence: ‘follow up on maintenance of MPRICs’, Ares(2023)2865103, 24 April 2023.

Most mainland camps are surrounded by fence e.g. RIC Malakasa or walls e.g. CTRC Ritsona and Polykastro, thus leaving no visual contact between residents and the outside world. Controlled entry and exit systems with x-ray gates and tourniquets have been set up in camps like Malakasa and Ritsona but not in Thiva or Corinth. Certain camps such as CTRC Polykastro have inside fencing between different sectors and CCTV, as is the case in camps like CCAC Samos or CCAC Kos on the islands. CTRC Thiva, Ritsona and Corinth do not have internal fences between the various sectors of the camps.

These features, akin to prison infrastructure, have drawn serious concerns by the European Ombudsman and Greek Ombudsman,²³ among others. As for the surveillance and controlled entry and exit systems, the Hellenic Data Protection Authority (Αρχή Προστασίας Δεδομένων Προσωπικού Χαρακτήρα, DPA) has issued a 175,000 € fine against the Ministry of Migration and Asylum for breaches of personal data protection in the design and roll-out of related programmes funded by the EU Recovery and Resilience Fund.²⁴

Food

Food to mainland camp residents is distributed via catering service under a RIS programme implemented with AMIF 2021-2027 funding.²⁵

Greek law provides that food provision, among other material reception conditions, is automatically terminated upon loss of “asylum seeker” status after a positive or negative asylum decision.²⁶ According to Ministry of Migration and Asylum statistics, 5,941 of the 16,911 people residing in mainland camps at the end of last year (35%) were not entitled to reception conditions. This population includes recognised refugees, as well as refugees whose claims have been unlawfully dismissed as inadmissible on the ground that Türkiye is a “safe third country” for them and who remain in legal limbo in view of the manifest lack of prospects of readmissions to Türkiye for the past four years.²⁷

Cases supported by RSA indicate that termination of food in mainland camps is in principle applied to adults.²⁸ This results in almost 6,000 people in principle deprived of food. These persons have minimal possibilities to cover needs on their own, given that rejected asylum seekers stop receiving a financial allowance and have no right to employment, while recognised refugees

²³ European Ombudsman, *Decision in strategic inquiry OI/3/2022/MHZ on how the European Commission ensures respect for fundamental rights in EU-funded migration management facilities in Greece*, 7 June 2023, para 48, available [here](#), Ombudsman, *The Challenge of Migratory Flows and Refugee Protection*, April 2024, 41.

²⁴ DPA, ‘Διοικητικό πρόστιμο και εντολή για συμμόρφωση με τον ΓΚΠΔ στο ΥΜΑ στο πλαίσιο αυτεπάγγελτης έρευνας της Αρχής’, 3 April 2024, available [here](#).

²⁵ ΤΑΜΕΥ, *Παροχή Υπηρεσιών Σίτισης Σε Δομές Της Υπηρεσίας Υποδοχής Και Ταυτοποίησης Στην Ενδοχώρα*, available [here](#) and [here](#).

²⁶ Article 109(1) Greek Asylum Code.

²⁷ RSA & PRO ASYL, *The Concept of “Safe Third Country”: Legal Standards & Implementation in the Greek Asylum System*, February 2024, 32-34, available [here](#).

²⁸ Namely, Ministry of Migration and Asylum, Reply to parliamentary question, 156045/2023, 16 March 2023, available [here](#).

stop receiving the financial allowance and have no process in place for – “automatic” – integration and inclusion in the labour market.

Case study: Joseph* from Sierra Leone is a survivor of serious forms of violence and suffers from mental health conditions. He was transferred from CCAC Lesvos to **CTRC Ritsona** and was subsequently notified a second instance negative decision on his asylum claim in early March 2024. He stopped receiving food as of that point. After the psychiatric ward of a public hospital attested the need for him to receive food and to continue his treatment, the Health Care and Psychosocial Support Unit of the camp recommended that he be included in food provision at the end of March. Joseph, while in treatment, remained excluded from food in the camp for one month. His application for judicial review and suspension of the rejection of his asylum claim is pending before the Administrative Court of Athens.

The European Commission continues to remind the Greek authorities that food provision to all camps residents regardless of status is imperative,²⁹ in line with their duty to respect the fundamental right to dignity and the prohibition on inhuman and degrading treatment. Similar recommendations are expressed by the Greek Ombudsman.³⁰ At the time of writing, however the RIS has not revisited its position on food provision to recognised refugees and rejected asylum seekers in the camps.

Financial allowance

The financial allowance foreseen in Greek law among other forms of “material reception conditions” consists of a “set financial sum offered to beneficiaries, complementary to housing, with a view to covering basic needs of food, clothing, shoes, personal hygiene, telecommunications, transport within the place of residence and basic school and pharmaceutical expenses”.³¹ Here too, eligibility for this allowance is reserved to asylum seekers who reside in the country’s reception system.³² The allowance is funded by AMIF 2021-2027. It is disbursed on an account that may be accessed by PIN code. Sums disbursed by month vary according to family composition as follows:

Level of monthly financial allowance for asylum seekers				
Unit	1 person	2 persons	3 persons	4+ persons
Sum	75 €	135 €	160 €	210 €

Source: Article C Annex III JMD 2089/2021

Nevertheless, even most asylum seekers who live in camps and are entitled to the financial allowance do not receive it in practice. Out of 25,484 asylum seekers entitled to reception

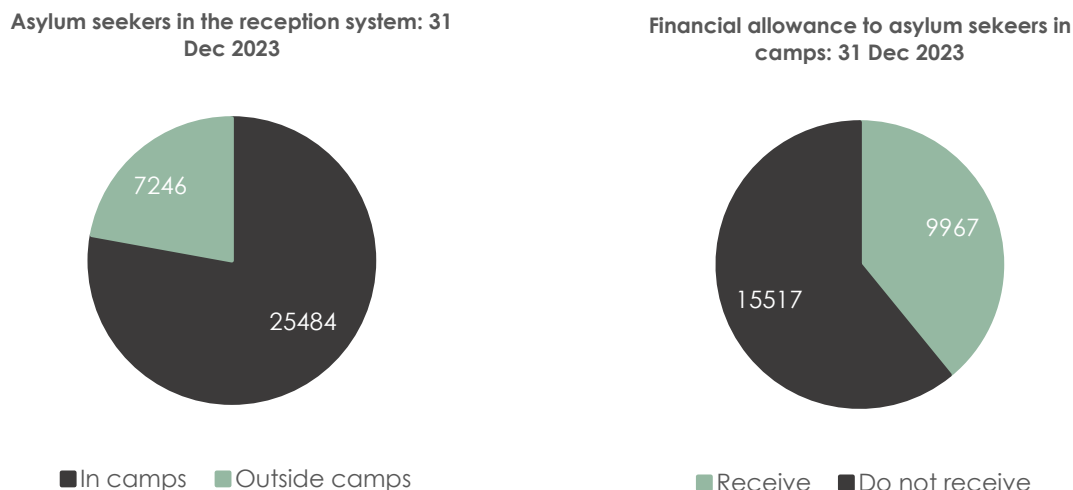
²⁹ European Commission, Letter to civil society organisations, Ares(2024)613054, 26 January 2024; Email correspondence: ‘Flash report: first meeting with Migration Minister Keridis 10 July’, Ares(2023)8357978, 11 July 2023.

³⁰ Ombudsman, *The Challenge of Migratory Flows and Refugee Protection*, April 2024, 59.

³¹ Article A1 Annex III JMD 2089/2021, Gov. Gazette B’ 4496/29.09.2021.

³² Article B1 Annex III JMD 2089/2021.

conditions who resided in Greek camps at the end of 2023, only 9,967 received the allowance according to official data of the Ministry of Migration and Asylum.³³ This means that more than 15,000 asylum seekers were deprived of the financial allowance they should be receiving from the RIS in addition to housing for the purpose of covering their daily expenses:



Source: Ministry of Migration and Asylum, Reply to parliamentary question, 5 Mar 2024 | Factsheet Financial Allowance, Dec 2023 | Statistics, Dec 2023

The extremely limited coverage of the asylum-seeking population demonstrates serious deficiencies in the grant of the financial allowance. The regulatory framework on the allowance states that “The financial allowance shall be disbursed on a monthly basis”³⁴ and that “The disbursement of the allowance shall start upon application of the applicants for international protection before [the RIS]. The application for grant of the allowance constitutes a solemn declaration that the applicant is not employed or that their employment does not provide sufficient funds”.³⁵

In practice, applicants are asked upon the lodging of their asylum claim at the RIS whether they need accommodation and RIS registration officers fill in the “Need for housing” entry of the registration form accordingly. The authorities therefore may and in fact assess at that stage whether applicants lack funds and are thereby eligible for material reception conditions. Nevertheless, applicants sign the consent form to receive the financial allowance up to a month after the lodging of the application. Furthermore, the RIS clarifies that “the financial allowance is disbursed on account and charged in the first ten days of the second month following the reference month”³⁶, that is two months later. Therefore, the financial allowance is disbursed to applicants with substantial delay and under a two-month retroactivity.

³³ However, data supplied by the Greek government to Eurostat refer to 10,515 persons who received reception conditions at the end of 2023: Eurostat, migr_asymrca. Following a request, Eurostat informed us on 11 April 2024 that it would request clarifications from the Greek authorities on the discrepancies in the data.

³⁴ Article B2 Annex III JMD 2089/2021.

³⁵ Article B4 Annex III JMD 2089/2021.

³⁶ RIS, ‘Αίτηση Οικονομικού Βοηθήματος’, 440645/2023, 28 September 2023.

Case study: Abbas* is a refugee from Afghanistan, where he has suffered torture. He arrived in Greece in early December 2023 but his asylum application was registered by CCAC Kos no earlier than mid-January 2024. Abbas was later transferred to **CTRC Corinth** and remains there at the time of writing. By mid-April 2024, Abbas had not yet received the financial allowance offered to asylum seekers. Upon request submitted through his lawyers, he was informed by the RIS that his request for the allowance was only submitted in mid-February, more than two months from his arrival and one month from the lodging of his claim.

Case study: Zabiollah* and **Raheel*** are a family of refugees from Afghanistan with minor children. They lodged an asylum application at CCAC Lesvos in February 2024 and were transferred to **CTRC Thiva** the same month. In response to their request for information regarding the receipt of the allowance, at the end of March the CTRC "transmitted the reply of the Housing Programmes and Material Reception Conditions Unit concerning your question relating to Family... Dears, further to your email correspondence we inform you that according to the Unit records the below beneficiaries are eligible for the financial allowance programme as of February. Since they are new registrations, the beneficiaries belong to the population group to whom the allowance will be disbursed under the new system, and we await updates from the implementation partner on the date of payment of February". The family had not received the financial allowance by early April, by which time they were granted refugee status.

Case study: Bashir* and **Zahra*** are a family of refugees from Afghanistan with minor children. Their asylum claim was dismissed as inadmissible at second instance based on the concept of "safe third country". Upon their request, however, the Administrative Court of Athens suspended the decision and ordered that reception conditions be reinstated. At the end of February 2024, the family received new International Protection Applicant Cards. By mid-April, however, they had not yet received the financial allowance. In response to their request, **CTRC Corinth**, the camp where they reside, noted that "the beneficiaries in question are eligible for the financial allowance as of February 2024, while payment will be carried out by the programme implementation partner upon further notice of the exact date in April 2024".

In addition, should the asylum process be completed and a decision be taken on the claim, the disbursement of the allowance ceases even where the remaining months of payment have not been covered. Given the aforementioned delays in the grant of the allowance, many people who receive an asylum decision within a short period of time end up completing their asylum procedure without ever receiving an allowance from the RIS to cater for their daily expenses.

Case study: Mahmoud* is a Syrian refugee and a survivor of the deadly June 2023 shipwreck off the coast of Pylos. His application was lodged in mid-June 2023 at **RIC Malakasa** and was accepted one month later, in mid-July. A subsequent update from the RIS confirmed that Mahmoud had been called to sign the consent form to receive the financial allowance no earlier than mid-July. Therefore, he never received the allowance for the month he spent as an asylum seeker at RIC Malakasa, since he has been recognised as a refugee.

Health care

Services inside camps

Every CTRC has a Health Care and Psychosocial Support Unit,³⁷ responsible *inter alia* for first-line care to residents. These units are in principle staffed by National Public Health Organisation (Εθνικός Οργανισμός Δημόσιας Υγείας, EODY) personnel through the PHILOS programme,³⁸ funded by AMIF 2021-2027 until the end of February 2024 and extended under national funding until the end of April 2024.³⁹ EODY units in the camps should comprise of doctors, nurses, midwives, social workers, psychologists, as well as coordinators and programme managers. Ministry of Migration and Asylum data refer to the following total number of health care personnel by camp at the end of 2023:

Health care personnel in Southern Greece Camps: 31 Dec 2023			
Camp	Personnel	Residents	Rate
RIC & CTRC Malakasa	15	2,565	1/171
CTRC Ritsona	9	2,291	1/255
CTRC Koutsochero	16	0	-
CTRC Schisto	14	872	1/62
CTRC Thiva	4	600	1/150
CTRC Corinth	1	706	1/706
CTRC Kyllini	6	303	1/51
CTRC Thermopyles	7	319	1/46
CTRC Oinofyta	6	314	1/52
CTRC Pyrgos	7	182	1/26
CTRC Elefsina	7	93	1/13

³⁷ Article 5(2) MD 23/13532/2020.

³⁸ TAMEY, Ολοκληρωμένη Επείγουσα Παρέμβαση Υγείας Για Την Προσφυγική Κρίση – Πρόγραμμα Philos, available [here](#). See also Ministry of Migration and Asylum, Ένταξη της Πράξης «Ολοκληρωμένη επείγουσα παρέμβαση υγείας στις Δομές Υποδοχής για την προσφυγική κρίση – Πρόγραμμα Philos» με Κωδικό ΟΠΣ 5223618 στο «ΤΠΑ ΜΕΤΑΝΑΣΤΕΥΣΗΣ ΚΑΙ ΑΣΥΛΟΥ 2021-2025», 110394/2024, 1 April 2024, available [here](#).

³⁹ According to the Ministry of Migration and Asylum, the programme has been extended until the end of April 2024 and the launch of the “HIPPOCRATES” programme: Ministry of Migration and Asylum, Reply to parliamentary question, 99297/2024, 22 March 2024, available [here](#).

CTRC Volos	3	110	1/37
CTRC Attiko Alsos	4	37	1/9
Total	99	8,392	1/85

Ministry of Migration and Asylum, Reply to parliamentary question, 5 Mar 2024

Health care personnel in Northern Greece Camps: 31 Dec 2023			
Camp	Personnel	Residents	Rate
CTRC Polykastros	6	1,206	1/201
CTRC Serres	6	1,244	1/207
CTRC Katsikas	8	940	1/118
CTRC Kavala	7	913	1/130
RIC & CTRC Diavata	17	531	1/31
CTRC Filippiada	11	503	1/46
CTRC Alexandria	12	621	1/52
CTRC Vagiochori	4	498	1/125
CTRC Sintiki	2	324	1/108
CTRC Lagadikia	7	503	1/72
CTRC Drama	6	370	1/62
CTRC Veria	9	339	1/38
CTRC Agia Eleni	8	347	1/43
RIC Fylakio	4	180	1/45
Σύνολο	107	8.519	1/80

Ministry of Migration and Asylum, Reply to parliamentary question, 5 Mar 2024

Disaggregated figures on Health Care and Psychosocial Support Units by health care staff profile have been made available by the Ministry of Migration and Asylum only for the three mainland camps operating as RIC, namely Malakasa, Diavata and Fylakio:

Health care personnel in mainland RIC: 31 Dec 2023							
RIC	Doctors	Nurses	Midwives	Social workers	Psychologists	Other	Residents
Malakasa	3	2	3	1	3	3	2,565
Diavata	3	2	2	3	3	4	531
Fylakio	1	2	1	0	0	0	180

Ministry of Migration and Asylum, Reply to parliamentary question, 5 Mar 2024

The above official statistics point to critical gaps in the medical coverage of people residing in mainland camps,⁴⁰ especially in larger facilities. According to official figures, the rate of EODY medical staff – not necessarily doctors – by CTRC residents at the end of last year was one staff

⁴⁰ See also Ombudsman, *The Challenge of Migratory Flows and Refugee Protection*, April 2024, 63, 67, 81.

member per 706 in Corinth, per 255 in Ritsona, per 207 in Serres, per 206 in Polykastro and per 171 in Malakasa. The Greek Ombudsman has also denounced the absence of doctors from CTRC Corinth following a mission where “the [EODY] Unit was found to be completely absent”.⁴¹

In fact, members of those units tend to cover more than one camps and therefore have to travel frequently. This is corroborated by the Greek Ombudsman following a mission to RIC Diavata.⁴² Similar findings from CTRC Thiva may be drawn from cases of residents represented by RSA. More generally, understaffing and insufficient medical personnel are systematic, structural problems in all Greek camps, both on the mainland as shown in these figures and on the islands as we reported last year.⁴³ These gaps expose people to serious risks and have significant impact on their physical and mental health.

The European Commission has conceded that “PHILOS II has suffered chronic gaps in the provision of health services, mostly due to the absence of doctors”.⁴⁴ For their part, the Greek authorities note that “Hippokrates the successor of Philos will include also protection activities, psychosocial services and monitoring public health”. They also state that “there will be no gap in the provision of protection activities” in the administration’s transition from PHILOS to Hippocrates.⁴⁵

Connection to public hospitals

Serious staff shortages in the Health Care and Psychosocial Support Units of mainland camps, as documented above, have inevitable repercussions on the effectiveness of connection of residents to public hospitals for health needs exceeding the capacities of the CTRC.

Case study: Zahra*, a refugee from Afghanistan, arrived in **CTRC Thiva** at a stage of advanced pregnancy. In early April, she was transferred to the General Hospital of Chalkida upon appointment for prenatal examination and was advised to return to the hospital on the next day for examinations in view of impending labour. Since no ambulance was offered by the hospital for her return to the CTRC, Zahra had to cover the transport costs on her own. She has still not received any financial allowance even though her asylum application was registered in mid-February 2024, as mentioned above. On the next day, Zahra was transferred to the General Hospital of Thiva. That hospital, however, has no gynaecologist and was therefore unable to examine her. She was instead referred to the General Hospital of Chalkida. Following telephone contact with CTRC Thiva, Zahra’s lawyers were informed that the Health Care and Psychosocial Support Unit of the camp has no doctor and is therefore not in a position to contact the two hospitals in order to facilitate the woman’s transfer from the Thiva Hospital to the Chalkida Hospital. Zahra’s lawyers directly contacted the services of both hospitals and ultimately an ambulance was made available for Zahra’s transport to the Chalkida Hospital.

⁴¹ Ombudsman, *The Challenge of Migratory Flows and Refugee Protection*, April 2024, 67.

⁴² *Ibid.*

⁴³ RSA, ‘What is happening today in the refugee structures on the Aegean islands’, 3 May 2023, available [here](#).

⁴⁴ European Commission, Letter to civil society organisations, Ares(2024)613054, 26 January 2024.

⁴⁵ *Ibid.*

The lack of interpretation services in public hospitals poses a constant barrier on people's access to the public health system, as confirmed in April 2024 through our contact with public hospitals where residents of different Southern Greece Camps are called to refer. Specifically:

- The General Hospital of Chalkida has had no interpreters for almost two years.
- The General Hospital of Thiva has no interpreters despite a request to EODY for assistance.
- The General Hospital of Livadia has no interpreters.
- The "KAT" General Hospital of Athens has no interpreters.
- The "Alexandra" General Hospital of Athens has interpretation in Farsi and Arabic through two PHILOS programme interpreters and French and Lingala through Médecins Sans Frontières.
- The "Elena Venizelou" General Hospital has interpretation in Arabic under the PHILOS programme.
- The "Agia Sofia" Children's Hospital has interpretation in Farsi and Arabic on a daily basis under the PHILOS programme.

In the case of Corinth too, the Greek Ombudsman stresses that "hospital services do not usually provide interpreters".⁴⁶

Additional obstacles to access to the Greek public health system face those camp residents who lack an active Provisional Foreigner's Insurance and Health Care Number (Προσωρινός Αριθμός Ασφάλισης και Υγειονομικής Περίθαλψης Αλλοδαπού, ΠΑΑΥΠΑ)⁴⁷ due to the rejection of their asylum claim, including people left in legal limbo following the dismissal of their applications as inadmissible based on the "safe third country" concept.

Case study: Halimo* is a refugee from Somalia and a mother of a minor child suffering from a serious orthopaedic condition. Both reside in **CTRC Ritsona** and had their initial asylum application dismissed as inadmissible based on the "safe third country" concept. In December 2023, Halimo reached out to EODY staff in the camp to request medication for respiratory issues from which she suffers. The camp, however, informed her that it was impossible to prescribe her medication since her ΠΑΑΥΠΑ has been deactivated. Similarly – and even though she later lodged a subsequent application – it was not possible to conduct the examination requested by a doctor of the "KAT" General Hospital of Athens for her minor daughter due to the lack of an active ΠΑΑΥΠΑ.

Access to services outside camps

The majority of camps on the mainland are located at a great distance from Greek urban centres. This creates "clear difficulties in accessing goods and services"⁴⁸ and generates among residents

⁴⁶ Ombudsman, *The Challenge of Migratory Flows and Refugee Protection*, April 2024, 67.

⁴⁷ Article 59(2) Greek Asylum Code.

⁴⁸ Ombudsman, *The Challenge of Migratory Flows and Refugee Protection*, April 2024, 47.

an intense feeling of isolation from local communities.⁴⁹ By way of example, distances of CTRC Malakasa, Ritsona, Thiva and Corinth from cities are as follows:

Distance of selected camps from services						
CTRC	Central Athens	Train station	Bus stop	Hospital	Pharmacy	ATM
Ritsona	75 km	11 km	10 km	18 km	9.7 km	12 km
Thiva	60 km	6.3 km	4.3 km	7.5 km	4 km	4.5 km
Corinth	82 km	1.9 km	900 m	2.8 km	1 km	1.2 km
Malakasa	40 km	800 m	500 m			8.8 km

Note that not all medical profiles are available in nearby hospitals. Travel to Athens is therefore often necessary.

Costs of travel by public transport (train, bus)⁵⁰ and/or taxi from these camps are as follows:

Cost of one-way travel from selected camps			
CTRC	Train	Bus	Taxi
Ritsona	Avlida 4.90 €	Chalkida 7.50 €	Athens 80 €
Thiva	Thiva 5.80 €	Thiva 8.80 €	Thiva 7-10 €
Corinth	Corinth 6.80 €	Corinth 7.50 €	
Malakasa	Athens 3.70 €	Athens 3.70 €	Athens 50 €

The RIS offers camp residents rented bus services to and from cities under a programme funded by AMIF 2021-2027.⁵¹ Connection of mainland camps with urban centres come under Category C of the programme: "Road Transport to Mainland Greece and Crete... c) from accommodation locations supervised by RIS... to public Services (administrative, hospitals, health centres, schools etc.), d) between accommodation locations supervised by RIS... and any other related travel need of TCN based on service needs".⁵² The same programme funds other types of travel such as transfers of asylum seekers from the islands to the mainland.

Transport services from camps to cities are conditioned on availability of funding under the implementing agreement required for the operation of the RIS programme. Where funds are

⁴⁹ RSA, '8th of March, International Women's Day: "A look from my window"', 8 March 2024, available [here](#).

⁵⁰ Efsyn, 'Άρνηση επιβίβασης προσφύγων στα ΚΤΕΛ Θήβας καταγγέλλει επιβάτρια', 11 April 2024, available [here](#).

⁵¹ TAMEY, Υπηρεσίες Μετακινήσεων Πολιτών Τρίτων Χωρών (ΠΤΧ) Εντός Της Ελληνικής Επικράτειας, available [here](#). See also Ministry of Migration and Asylum, 2^η Τροποποίηση της Πράξης «Υπηρεσίες μετακινήσεων Πολιτών Τρίτων Χωρών (ΠΤΧ) εντός της Ελληνικής Επικράτειας» με Κωδικό ΟΠΣ 6000500 στο Πρόγραμμα «Πρόγραμμα Ελλάδας – Ταμείο Ασύλου, Μετανάστευσης και Ένταξης 2021-2027», 12 March 2024, available [here](#).

⁵² *Ibid.*

exhausted and until a new agreement is signed and implemented, the RIS does not offer transport services to camp residents.

Failure on the part of the Ministry of Migration and Asylum to promptly renew these contracts leads to frequent, often indefinite interruption of transport services from camps to the cities, despite the availability of EU funding. Transport services were halted for a large part of 2023. They were reinstated in January 2024 and have been suspended again from the end of February 2024 until at least mid-May. Accordingly, camp residents have no means to travel even to necessary health services or to mandatory appointments with asylum authorities e.g. for registration of an asylum application for an interview.⁵³ Covering travel costs privately is extremely difficult for residents, as most of them are eligible for but do not receive the financial allowance as stated above.

Case study: Halimo* is a refugee from Somalia and a mother of a minor child suffering from a serious orthopaedic condition. Both reside in **CTRC Ritsona**. After their initial asylum claim was dismissed as inadmissible based on the “safe third country” concept, they made a subsequent application. The family, however, had no means to attend the scheduled registration of their application at the Asylum Service and to visit a hospital doctor due to the absence of means of transport for residents of CTRC Ritsona. As a result, registration was postponed and all authorities involved were notified. Later, the issue seemed to have been resolved – transport to Athens was covered at least on certain days of the week – but re-emerged when Halimo and her daughter had to collect their cards. They ended up collecting them from the Regional Asylum Office of Alimos by covering their travel expenses on their own. It is worth noting that the RIS has not responded to date to the requests the women filed through their lawyers for transport to Athens and for information thereon.

Case study: Maryam* is a refugee from Afghanistan and a single mother of minor children. She arrived in Greece in October 2022 with one of her children after being separated from her second child that was unlawfully pushed back to Türkiye. The family was placed in **CTRC Thiva** and had their interview with the competent branch of the Asylum Service scheduled for mid-March 2023 at the Regional Asylum Office of Piraeus. One week prior to her interview, Maryam asked the camp to arrange her timely transfer from CTRC Thiva to Piraeus. The camp, however, informed her lawyers that “The transfer of the beneficiary and her minor child shall take place on their own means, given that there is no contract with any company for the moment and all beneficiaries of the camp travel on their own means.”. After she received refugee status at the end of April 2023, Maryam had to sign declarations under oath (ένορκες βεβαιώσεις) before a notary in Athens in order to be able to issue passports for her children. These travels were not supported by CTRC Thiva either.

The problem was already known to the authorities and to EU institutions at the time the International Organisation for Migration (IOM) announced its departure from mainland camps in

⁵³ Ombudsman, *The Challenge of Migratory Flows and Refugee Protection*, April 2024, 129. See also RSA, ‘In search of safety: The struggle of Afghan single mothers in Greece’, 20 July 2023, available [here](#); ‘Refugee women in the offside’, 21 March 2023, available [here](#).

spring of last year, upon termination of its HARP programme. In a report of a 31 March 2023 mission of its Directorate-General for Migration and Home Affairs “to Malakasa Camp against the background of deterioration of the situation there”, the European Commission notes: “The phase out of IOM services will have an impact on the daily operation in the camp. In particular, transportation in combination with interpretation will be a problematic issue.”⁵⁴

Furthermore, even during the active operation of the RIS transport programme, cases supported by RSA indicate that residents are informed by the authorities that transfers related to access to medical services and to doctors' appointments are awarded priority. Residents, however, are not systematically and clearly informed of the necessary notice they need to give camp management in order to secure a place on the rented bus. Due to this, transport has become possible only upon intervention from their lawyers even in urgent cases.

Case study: Parwana* and **Farhad*** are refugees from Afghanistan and parents to five children. They remain in **CTRC Ritsona** without documentation or access to reception conditions following the final rejection of their asylum claim based on the “safe third country” concept. The family informed the camp of a scheduled appointment with the Médecins Sans Frontières clinic in Athens in mid-February 2024 for which they required transport. They were informed, however, that no place was available on the bus that day. They proceeded to reschedule their medical appointment for four days later but were again told by the camp that no places were available on that date either. On the same day, RSA lawyers and the RSA social worker wrote to the camp and the family was ultimately included in the transport list. The family arranged their next appointment with Médecins Sans Frontières at the end of February and requested travel arrangements five days prior. They were, however, orally informed by the camp that no place was available for them. Following a new intervention of their lawyers to CTRC Ritsona, the family was included in the transport schedule on the day of their appointment.

Treatment of vulnerable persons

Vulnerability assessment

Greek law prescribes that “The assessment of whether persons entering without legal requirements are vulnerable shall be conducted upon their identification procedure during the registration and medical check procedures” carried out by the RIS in the RIC or CCAC throughout the territory.⁵⁵ That process is marred by severe, chronic deficiencies in particular in the CCAC on the Eastern Aegean islands.⁵⁶ In last year’s report on the island CCAC, we noted that “With the current

⁵⁴ European Commission, Email correspondence: ‘Report visit Malakasa 31.03.2023’, Ares(2023)2924595, 4 April 2023.

⁵⁵ Articles 41 and 62(2) Greek Asylum Code. See also Article 16 JMD 1/7433/2019.

⁵⁶ RSA et al., *The state of the border procedure on the Greek islands*, September 2023, 16-17, available [here](#).

deficiencies of medical and psychosocial personnel as reflected on each island, vulnerability assessment is significantly delayed... As a result, in many cases, the procedure of examining an asylum application is initiated without the necessary registration of vulnerability, and with serious shortcomings in supporting and referring vulnerable cases."⁵⁷

These problems persist, given that critical shortages in EODY medical personnel in the island CCAC remain unaddressed. The recent Greek Ombudsman report highlights that "In the CCACs and RICs, it was unclear, especially when the number of new arrivals increase, whether an initial medical screening is carried out or whether the first contact with the Unit takes place after the identification and registration process."⁵⁸

According to official RIS statistics, only 8,104 of the 55,875 people who underwent reception and identification ("screening") procedures over the past year were declared to be vulnerable at that stage:

Vulnerability assessment in reception and identification procedures: 2023			
Location	Vulnerable persons	Total registrations	Share
Islands and land border	6,792	41,790	16.3%
Mainland	1,312	14,085	9.3%
Total	8,104	55,875	14.5%

Source: Ministry of Migration and Asylum, Reception and identification statistics, Dec 2023

At the same time, responsibilities of the Health Care and Psychosocial Support Units of the mainland CTRC include "assessment of vulnerability and recommendation to the Director for referral of those persons to the competent public institution for social support or protection", "assessment and collection of mental health history, as well as social history and update of the relevant file", "filling, update and keeping of hard-copy and/or electronic medical file of the residents" and "conduct of age assessment procedures".⁵⁹ Greek law therefore entrusts the CTRC too with the duty to assess the vulnerability of the people they accommodate.

Practice stemming from cases supported by RSA in mainland camps is different. The CTRC may be able to provide medical and psychosocial support services to residents, provided they have the necessary personnel. They are not, however, able to classify an applicant under a specific vulnerability category or to amend such a classification where it has previously been done by the RIC or CCAC that conducted reception and identification procedures. As a result, asylum seekers whose vulnerability was not properly assessed during reception and identification procedures and was only identified after they were transferred to mainland CTRC cannot update their Foreigner's Health Card and the remainder of the case file kept by the RIS and uploaded on the "Alkyoni II" information system that is also used by the Asylum Service and Independent Appeals Committees.

⁵⁷ RSA, 'What is happening today in the refugee structures on the Aegean islands', 3 May 2023, available [here](#).

⁵⁸ Ombudsman, *The Challenge of Migratory Flows and Refugee Protection*, April 2024, 69.

⁵⁹ Article 5(2)(a) MD 23/13532/2020.

Case study: Kabir* and **Soraya*** are refugees from Afghanistan and parents to two children. The family arrived in July 2023 on Samos. During their reception and identification procedures at CCAC Samos they did not undergo an adequate medical check and vulnerability assessment. All family members' Health Cards are blank and contain no medical history or classification under a vulnerability category, despite reported neurological, heart and gynaecological conditions. The family's asylum application was dismissed at first instance based on the "safe third country" concept after they had been transferred to **CTRC Ritsona**. Soraya in particular had undergone medical examinations at the General Hospital of Samos and had been informed that she would receive the results at CTRC Ritsona.

Pending their appeal, they asked the camp in October 2023 "to conduct a medical check and an assessment of the health situation and to provide the necessary care to the above in view of their urgent medical needs, namely by: An orthopaedic and psychologist for the first applicant... A gynaecologist for the second applicant... A cardiologist for the second minor child". They also requested to receive the results of Soraya's medical examinations from the General Hospital of Samos. This request was also submitted to the Appeals Committee competent for the examination of their appeal.

CTRC Ritsona replied to Kabir and Soraya's request four months later, at the end of February 2024. By that time their asylum claim had already been dismissed at second instance on the ground that Türkiye qualifies as a "safe third country" for them. The response of the camp states that it "proceeded to an assessment of the needs and vulnerabilities of said family on... 11/23 and carried out the following actions... The [third-country nationals], as reported to us, have already visited the medical unit of EODY, SAMS and MSF outside the camp and await information from the EODY medical unit regarding the schedule of their appointments at public hospitals. In addition, Management proceeded to refer the parents to the medical and the psychosocial unit of EODY for provision of psychological support, upon their request. Finally, as for the means of collection of the medical examinations conducted at the General Hospital of Samos, the case has been referred to EODY via email and we await their actions". At the time of writing, the family had received no document and no further information on the above.

Case study: Farah* is a refugee from Iraq and a single mother of minor children. Upon arrival on Samos in October 2023, they were not subjected to appropriate medical checks at CCAC Samos and Farah was not identified as a survivor of serious forms of violence, nor was one of her children identified as disabled. The family was subsequently transferred to the mainland and is currently in **CTRC Thiva**. In early 2024, the psychologist of the Health Care and Psychosocial Support Unit of CTCR Thiva examined the applicant and prepared a report referring to the violence she has experienced, as well as the disability of one of her children. Farah asked the RIS to re-assess her and her children's vulnerability and to update their file in view of her asylum interview held at the end of April. No vulnerability assessment took place prior to her interview.

The Ministry of Migration and Asylum had already declared since 2022 that "As of January 2023, a working-group will be established together with IOM, UNHCR EUAA and DG HOME aiming to develop standard operating procedures on the assessment of vulnerability and defining clearly the special receptions conditions for each vulnerable group".⁶⁰ No further notice has been given, however, on the creation of said working group or on the development of standard operating procedures until now. The absence of steps to secure such procedures may be inferred from a recent statement of the EU institutions on the matter: "the Commission has raised the need to establish dedicated Standard Operating Procedures on vulnerability assessments".⁶¹

Special reception conditions

As part of its supervision of the execution of the ECtHR judgment in *M.S.S. v. Belgium and Greece*, the Committee of Ministers of the Council of Europe has requested the Greek government "in light of the Court's findings in the A.D. judgment... to provide concrete information on the reception and living conditions of pregnant women and other vulnerable individuals as well as their assessment as to the necessity of measures in this regard".⁶²

Greek law provides that "Only vulnerable persons are deemed to have special reception needs and thereby benefit from special reception conditions".⁶³ Yet, the law stops short of specifying what special reception conditions consist of and how they differ from the conditions provided to the general asylum-seeking population.

Since the termination of the ESTIA programme at the end of 2022, accommodation in RIC and CTCR is the sole form of housing for asylum seekers on the mainland, even for those classified as vulnerable. At that time the Ministry of Migration and Asylum had already announced the launch of a new programme named STIRIXIS, to succeed ESTIA by providing – only – 500 accommodation

⁶⁰ European Commission, *Task Force Migration Management Mission Report – Athens/Lesvos – December 2022*, Ares(2022)8851878, December 2022, 3.

⁶¹ European Commission, Letter to civil society organisations, Ares(2024)613054, 26 January 2024.

⁶² Council of Europe Committee of Ministers, CM/Del/Dec(2023)1475/H46-15, 21 September 2023, para 5.

⁶³ Article 62(3) Greek Asylum Code.

places in apartments in Athens and Thessaloniki for vulnerable asylum seekers.⁶⁴ That programme has been neither officially launched nor rolled out to date.⁶⁵ That said, the immediate announcement of a new programme for decentralised urban accommodation by the Ministry should be read as an admission of error in the policy choice to dismantle the ESTIA programme and of the inability to afford adequate reception conditions in camps isolated from local communities.

Official statistics of the Ministry of Migration and Asylum indicate that all mainland camps except for CTRC Attiko Alsos accommodate vulnerable asylum seekers who have been identified as having special reception needs. At the end of last year, the mainland camps hosted a total of 1,986 people who according to the authorities received special reception conditions:

Persons with special reception needs in Southern Greece Camps: 31 Dec 2023			
Camp	Vulnerable	Total residents	Share
RIC & CTRC Malakasa	154	2,565	6%
CTRC Ritsona	335	2,291	14.6%
CTRC Koutsochero	0	0	0%
CTRC Schisto	69	872	7.9%
CTRC Thiva	81	600	13.5%
CTRC Corinth	75	706	10.6%
CTRC Kyllini	35	303	11.6%
CTRC Thermopyles	29	319	9.1%
CTRC Oinofyta	23	314	7.3%
CTRC Pyrgos	75	182	40.5%
CTRC Elefsina	24	93	25.8%
CTRC Volos	16	110	14.5%
CTRC Attiko Alsos	0	37	0%
Total	916	8,392	10.9%

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Persons with special reception needs in Northern Greece Camps: 31 Dec 2023			
Camp	Vulnerable	Total residents	Share
CTRC Polykastro	165	1,206	13.7%
CTRC Serres	150	1,244	12.1%
CTRC Katsikas	108	940	11.5%
CTRC Kavala	113	913	12.4%
RIC & CTRC Diavata	50	531	9.4%

⁶⁴ European Commission, *Task Force Migration Management Mission Report – Athens/Lesvos – December 2022*, Ares(2022)8851878, December 2022, 3; *Operational conclusions 12th Steering Committee for Migration Management*, Ares(2023)3222469, 25 April 2023, para 1.3.

⁶⁵ Although the call for proposals was to be published in the first quarter of 2024: TAMEY, *Προγραμματισμός προσκλήσεων για την υποβολή προτάσεων*, September 2023, available [here](#).

CTRC Filippiada	54	503	10.7%
CTRC Alexandria	95	621	15.3%
CTRC Vagiochori	65	498	13.1%
CTRC Sintiki	19	324	5.9%
CTRC Lagadikia	57	503	11.3%
CTRC Drama	35	370	9.5%
CTRC Veria	90	339	26.5%
CTRC Agia Eleni	51	347	14.7%
RIC Fylakio	18	180	10%
Total	1,070	8,519	12.6%

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The majority of asylum seekers who have been classified by the RIS as vulnerable in the Greek reception system have been placed in CTRC Ritsona, Polykastro, Serres and Malakasa. As stated earlier, CTRC Ritsona faces not only critical shortages in medical personnel but also security issues.

In the cases supported by RSA, it remains unclear how special reception conditions afforded to people placed in camps differ from the general conditions available to the rest of the population staying in the same sites.

Case study: Farzana*, her minor sister and their father were placed in an unsuitable room inside a rub-hall at **CTRC Corinth**, as described above. Upon request for special reception conditions, in which they highlighted the psychiatric and orthopaedic issues of the family, CTRC Corinth replied in mid-September 2023 that “it provided the third-country nationals in question – upon arrival – with food, the closest hall to the common WC and included them in the financial allowance (they signed the consent form for the financial allowance...) Additionally, the hall is equipped with a heating and cooling system per room, bed linen, while personal hygiene items were given upon their arrival”. The camp added that “for the purpose of fulfilling special reception conditions it provided each of the children of the third-country nationals with an appointment with the psychologist working inside the Camp... The psychologist concluded that the children require consultation with a child psychologist and for that reason such an appointment was scheduled at the General Hospital of Corinth... for both children”, while “an appointment was scheduled at the Orthopaedic unit of the General Hospital of Corinth for... given that he suffers from disc disease”. The camp came to the conclusion that “it offers the special reception conditions to your clients with respect to their vulnerability as a single-parent family with the medical and psychosocial problems they face”.

The absence of measures on the part of RIS to respond to special reception needs emerges even in extremely vulnerable cases such as those of children who have suffered serious forms of

violence. Greek law requires that these children be referred “to rehabilitation services and to receive appropriate psychological care and specialised treatment”.⁶⁶

Case study: Mari* and her minor daughter are a single-parent family of refugees from Afghanistan. The child suffered serious forms of sexual abuse inside the camp in which they resided. Following the incident, criminal proceedings were launched and the child was transferred by the RIS to **CTRC Malakasa** together with her mother in early March 2023. Since then, however, the family was not transferred to a shelter for victims of gender-based violence. They remained in CTRC Malakasa where the child was not provided with the necessary care and support, nor was she referred to a child psychologist or to other rehabilitation services. In October 2023, after they received refugee status and travel documents, Mari and her daughter were forced to depart from the camp and became homeless until their departure from Greece. In a document issued in February 2024 on the family's complaint, the RIS stated that “for the second complainant we deem that [the complainants] should have requested support or referral of the minor to a child psychologist”.

In other cases, requests by vulnerable residents of mainland camps for special reception conditions have not been met with any reply from the authorities:

Case study: Najla* and her minor daughter are a single-parent family of refugees from Afghanistan. Both are survivors of serious forms of gender-based violence and suffer from mental health conditions. They were placed in **CTRC Malakasa** after RIC Malakasa had identified them as vulnerable and the child as a victim of violence. In May 2023, Najla requested special reception conditions for her daughter and herself. She specifically asked for a transfer to an appropriate place – apartment – and for adequate health care. Najla explained that the distance of CTRC Malakasa from Athens makes the family's access to medical services extremely difficult, on the one hand, and that the camp has no specialised medical personnel such as a psychiatrist or a child psychiatrist to support them and does not have effective processes for referrals to the public health system. Najla's request never received a reply from RIC Malakasa. The family was notified a refugee status decision at the end of August 2023.

Integration support

State support for the integration of people receiving international protection into Greek society is inextricably linked to the camp system. The HELIOS integration programme implemented by IOM

⁶⁶ Article 63(2) Greek Asylum Code.

is available to refugees upon condition that they reside in the country's reception system at the time of the grant of international protection.⁶⁷

That support, however, remains insufficient in practice. On the one hand, the operation of the programme has been interrupted for a significant period of time on account of delays in its successive extensions. On the other hand, Greek law sets an extremely short deadline of 30 days to recognised refugees to vacate the camps and immediately terminates material reception conditions such as food and the financial allowance.⁶⁸ Such an expectation on refugees to 'automatically' transition into self-sufficiency and subsistence is both unfeasible and deterred throughout their time as asylum seekers, for the reasons outlined in this report. As a result, hundreds of refugees end up in a state of precariousness and destitution immediately upon receiving international protection. They suddenly find themselves without a financial allowance, have no job – since their access to employment is nearly impossible while they reside in the camps – and no right to food in the camp, and are called to leave within one month without being able to secure housing. We further note that the HELIOS programme remains prohibitive for many refugees in light of bureaucratic and substantive requirements, even when it is operational.

Administrative staff and services

The number of administrative personnel in mainland camps is presented in official Ministry of Migration and Asylum data as follows:

Administrative staff in Southern Greece Camps: 31 Dec 2023		
Camp	Personnel	Residents
RIC & CTRC Malakasa	62	2,565
CTRC Ritsona	34	2,291
CTRC Koutsochero	26	0
CTRC Schisto	55	872
CTRC Thiva	24	600
CTRC Corinth	15	706
CTRC Kyllini	13	303
CTRC Thermopyles	23	319
CTRC Oinofyta	5	314
CTRC Pyrgos	36	182
CTRC Elefsina	22	93
CTRC Volos	14	110
CTRC Attiko Alsos	10	37
Total	339	8,392

⁶⁷ See further RSA & Stiftung PRO ASYL, *Recognised Refugees in Greece - 2024: Beneficiaries of international protection in Greece. Access to documents and socio-economic rights*, March 2024, 20-22, available [here](#).

⁶⁸ Article 109(1) Greek Asylum Code.

Administrative staff in Northern Greece Camps: 31 Dec 2023		
Camp	Personnel	Residents
CTRC Polykastro	10	1,206
CTRC Serres	22	1,244
CTRC Katsikas	12	940
CTRC Kavala	13	913
RIC & CTRC Diavata	68	531
CTRC Filippiada	10	503
CTRC Alexandria	13	621
CTRC Vagiochori	4	498
CTRC Sintiki	16	324
CTRC Lagadikia	7	503
CTRC Drama	14	370
CTRC Veria	12	339
CTRC Agia Eleni	6	347
RIC Fylakio	52	180
Total	259	8,519

Ministry of Migration and Asylum, Reply to parliamentary question, 5 Mar 2024

Disaggregated figures by type of contract or recruitment are made available by the Ministry of Migration and Asylum for the three, best staffed, camps operating as RIC, namely Malakasa, Diavata and Fylakio:

Administrative staff in mainland RIC: 31 Dec 2023							
RIC	Permanent staff	Service staff	Temporary contract	Private law contract	Community service	EUAA staff	Total
Malakasa	4	1	3	17	18	19	62
Diavata	12	1	3	2	40	10	68
Fylakio	3	1	23	9	13	3	52

Ministry of Migration and Asylum, Reply to parliamentary question, 5 Mar 2024

In cases supported by RSA in CTRC such as Ritsona, Thiva and Corinth, services such as the certification of residents' signatures are covered without delay by camp management, upon request in person and/or via email. This step is necessary for actions such as authorising a legal representative.⁶⁹ Camps are equally rapid in responding to requests for attestations from CTRC Managers on the residence of the persons concerned in the camps. Such certificates are needed, for instance, for exemption from the requirement to appear in person before the Independent Appeals Committees at the stage of examination of the appeal in the asylum procedure.⁷⁰

⁶⁹ Article 76(1) Greek Asylum Code.

⁷⁰ Article 83(3) Greek Asylum Code.

Beyond the RIC on the mainland, CTRC such as Corinth and Ritsona also issue International Protection Applicant Cards. Camps such as RIC Malakasa or CTRC Thiva also offer spaces (containers) for remote interviews with the Asylum Service.

Additional processes foreseen in Greek law such as the lodging of the asylum appeal before the CTRC Manager where the asylum seeker resides in a camp located in a different place from the Regional Asylum Office (RAO) or Autonomous Asylum Unit (AAU) which examined their case⁷¹ have not been implemented to date. Camp residents are still required to appear before the territorially competent RAO or AAU in order to lodge their asylum appeal.⁷² They therefore face the repercussions of the absence of transport services to urban centres. For instance, the responsible office for cases of Afghan nationals residing in Southern Greece Camps e.g. CTRC Ritsona, Thiva or Koutsochero is RAO Piraeus – For Somali nationals, RAO Alimos. This practice jeopardises people's access to appeals within the deadlines set by Greek law.⁷³

Case study: Leyla* and Walid* are refugees from Afghanistan and parents to four children. They arrived on Lesbos in August 2023 and were transferred to **CTRC Ritsona** one month later. On the same day, their asylum application was dismissed at first instance on the ground that Türkiye is a "safe third country" for them. Four days prior to the expiry of the twenty-day time limit to appeal against the decision, their appeal was sent to the camp via email with a request for the family to lodge it there in person. CTRC Ritsona informed the family's lawyers via phone that it is not in a position to receive appeals submitted in person by residents and that Leyla and Walid would have to travel to RAO Piraeus upon appointment in order to lodge their appeal. Such an appointment was immediately scheduled for the next day. However, the camp informed the family's lawyers that there was no availability of transport from Ritsona to Athens. Following further contacts with the competent services, a new appointment was set for the lodging of the appeal at RAO Piraeus after the expiry of the deadline. The Asylum Service expressly noted that the appeal was submitted in time.

As for notifications of asylum decisions to camp residents, Greek law states that decisions shall be transmitted to the camp manager in order to be notified to the persons concerned.⁷⁴ In cases supported by RSA in camps such as CTRC Ritsona and CTRC Thiva, however, notifications of asylum decisions take place via email and not through the camp managers.

⁷¹ Article 99(1) Greek Asylum Code.

⁷² According to Article 99(1) Greek Asylum Code, the appeal must be signed by the appellant themselves to be admissible.

⁷³ Over the past year, the Appeals Committees dismissed a total of 1,523 appeals due to late submission: Ministry of Migration and Asylum, *Statistics*, December 2023, available [here](#).

⁷⁴ Article 87(4) Greek Asylum Code.

Recommendations

The above findings demonstrate that the reception system in mainland camps is characterised by a generalized lack of access to reception conditions for asylum seekers. This stems from the combined effects of insufficient staffing of camps, failure to grant financial allowances to most eligible applicants, poor connection of camps to urban services, and lack of measures to support integration of those who receive international protection. As a result, this system does not meet the minimum legal standards on dignified living of people seeking protection in Greece, creates serious obstacles in the asylum procedure and the fair and efficient processing of their claims, generates critical psychosocial effects and discourages their integration into Greek society. These factors contribute to a picture of the camps as a “closed system” whereby reception is instrumentalised as a means of deterrence of refugees from seeking protection in Greece.

Drawing on the above observations, RSA firmly opposes the current Greek strategy of mass accommodation camps, isolated and distanced from society. We call for the **full reinstatement of the model of decentralised, urban reception of asylum seekers**, as tested and implemented through the ESTIA programme, with full use of available EU and domestic funding options and with buy-in from local authorities throughout the Greek territory.

Until a policy of dignified, decentralised housing is achieved, existing camps may solely be considered as a means to support first reception of newly arrived asylum seekers under strict conditions, namely:

1. **Temporariness:** Residence in camps should be short. Policies that unjustifiably prolong the period of applicants' stay e.g. application of the “safe third country” concept should be ceased.
2. **Connectivity:** Residence should have effective access to local communities and to urban services. The financial allowance should be granted immediately and without interruption from the moment the asylum application is made.
3. **Transition:** Applicants should have integration prospects during their stay in the camps. Access to the labour market should be promoted. The HELIOS programme should be restructured based on ESTIA standards and include asylum seekers to truly support transition into local communities.



<https://rsaegean.org/en/refugee-camps-in-mainland-greece>



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RSA provides free legal assistance to asylum seekers and
refugees, with funding from the PRO ASYL Foundation