



**EUROPEAN COMMITTEE OF SOCIAL RIGHTS
COMITE EUROPEEN DES DROITS SOCIAUX**

9 October 2019

Case Document No. 6

**International Commission of Jurists (ICJ) and European Council for Refugees and
Exiles (ECRE) v. Greece**
Complaint No.173/2018

SUBMISSIONS BY THE GOVERNMENT ON THE MERITS

Registered at the Secretariat on 13 September 2019



HELLENIC REPUBLIC

MINISTRY OF LABOUR AND SOCIAL AFFAIRS

OBSERVATIONS OF THE GREEK GOVERNMENT ON THE MERITS

COLLECTIVE COMPLAINT 173/2018

***“International Commission of Jurists (ICJ) and European Council for Refugees
and Exiles (ECRE)
v. Greece”***

COLLECTIVE COMPLAINT No 173/2018

***“International Commission of Jurists (ICJ) and
European Council for Refugees and Exiles (ECRE)
v. Greece”***

OBSERVATIONS OF THE GREEK GOVERNMENT ON THE MERITS

By letter dated 07/12/2018, the Council of Europe (Directorate General of Human Rights and Rule of Law – Department of the European Social Charter) informed the Greek government that the international non-governmental organisations *International Commission of Jurists (ICJ) and European Council for Refugees and Exiles (ECRE)* lodged collective complaint No 173/2018 against Greece, on the rights of unaccompanied and accompanied migrant – refugee – asylum seeker children on the Northern Aegean islands and of unaccompanied children on the mainland of Greece, alleging breach of articles 7para.10, 11 para.1 and 3, 13, 16, 17 and 31 paras.1 and 2 of the Revised European Social Charter.

The complaint was declared admissible by the European Committee of Social Rights (ECSR), by decision dated 23/05/2019, inviting Greece to make written submissions on the merits.

The Greek government with the present response has the honor to present its observations on the merits of collective complaint No. 173/2018, *International Commission of Jurists (ICJ) and European Council for Refugees and Exiles (ECRE) v. Greece*.

I. INTRODUCTIVE OBSERVATIONS

The protection of unaccompanied minors is a national policy priority and the Greek government is working hard to address the difficult current situation in cooperation with all agents involved in international, European, bilateral and national level with respect to human rights. Greece’s policy not to refuse any minor’s entry to the country ensures that all Unaccompanied Minors (UAMs) are treated first and foremost as children, irrespective of their migration status.

In its observations on the merits, the Greek Government will present how, immediately after arrival, unaccompanied children are provided with material reception conditions that include housing, food and clothing and non-material reception conditions, such as medical and psychological screening. The reception conditions are provided to both asylum-seeking and non-asylum seeking UAMs.

The Migration and Social Integration Code (Law 4251/2014), aiming at protecting all vulnerable groups and eliminating all forms of discrimination, provides that all persons residing in Greece, regardless of their residence status or of that of their parents, enjoy the right to education including the enrollment to public schools for children of refugees, asylum seekers and foreign citizens.

Also, foreign minors have full access to health care, regardless of their residence status or of that of their parents.

The national legislative framework provides for a protective regime for children's rights, so that minors of third countries enjoy enhanced protection, in accordance with the principles of equality and non-discrimination on the grounds of race, sex, language or religion and with respect to their specificities.

Before analyzing all the above, it is worth pointing out the following figures, that indicate the magnitude of the issue, since, without reference to them, the situation in the country regarding migratory flows cannot be accurately mapped and understood in its full range.

Currently (during the summer months of 2019) there was a sharp increase in unaccompanied children arrivals at the entry points. The estimated total number of unaccompanied minors in Greece amounts to 4,393 children, 1,777 of which are protected in appropriate long-term or temporary accommodation facilities. In addition, 1,142 unaccompanied children remain at Reception and Identification Centers (RIC), 250 are placed in protective custody, 134 remain at Open Accommodation Centers on the mainland while 1,090 children live under informal, precarious housing conditions.¹

Increasing the number of places for the accommodation of unaccompanied children in appropriate protected facilities is of utmost priority and therefore, intensive efforts are made to this end not only in order to decongest the entry points but also to strengthen the national child protection system, in line with the principle of the child's best interests.

More specifically, main actions are focused on the immediate creation of places in Accommodation Centers for Unaccompanied Children, the finalization of the institutional framework and the extension of unaccompanied children's accommodation (over the age of 16) to semi-independent living flats, continuation of temporary accommodation measures, speeding up procedures for their family reunification based on the Dublin III Regulation, establishing national standards for the operation of accommodation and care facilities for unaccompanied children, strengthening guardianship system as well as strengthening the operational role of the National Center for Social Solidarity (E.K.K.A.) for the protection of unaccompanied children. Furthermore, the assistance of EU member states is necessary through the development of relocation programs for unaccompanied children.

II. LEGAL FRAMEWORK

By virtue of Law 4540/2018², Directive 2013/33/EU of the European Parliament and of the Council was adopted «laying down standards for the reception of applicants for international protection». In addition to the definition of the term "minor" and "unaccompanied minor", the law also includes the concept of "separated minor".

More specifically, the provisions on minors are the following:

a. In accordance with article 20 (General principle for vulnerable persons and assessment of the special reception needs of vulnerable persons - articles 21 and 22 of

¹ National Center for Social Solidarity, *Updated status: Unaccompanied Children in Greece 31 August 2019*

² Law 4540/2018 (OG 91 A'/22-5-2018)

the Directive), when implementing the provisions on reception conditions (chapter B), the special status of vulnerable persons shall be taken into account. Such vulnerable persons include minors, unaccompanied or not and separated minors.

b. In accordance with article 21 (Minors – article 23 of the Directive), the best interests of the child shall be a primary consideration of relevant Authorities when implementing the provisions of this law. An adequate standard of living shall be ensured for their physical, mental, spiritual, moral and social development. In assessing the best interests of the child, the following factors shall in particular be taken into account: family reunification possibilities, the minor's well-being and social development, safety and security considerations, in particular where there is a risk of the minor being a victim of human trafficking, and the views of the minor in accordance with his or her age and maturity.

c. In accordance with article 22 (Unaccompanied minors and separated minors – article 24 of the Directive) the relevant Authorities at Greek territory entry points, as well as any relevant Authority that identifies the entry of an unaccompanied or separated child in the territory of Greece, shall inform the closest public prosecutor's office and the relevant Authority for the protection of unaccompanied and separated children. The Reception and Identification Service is responsible for the reception and identification of unaccompanied children at RICs, while the General Directorate for Social Solidarity of the Ministry of Labour, Social Security and Social Solidarity is assigned with the task of protecting unaccompanied and separated children.

The appointment of a representative of the unaccompanied child is included in the responsibilities for the protection of unaccompanied children. The Ministry of Labour has worked on the framework for unaccompanied children's guardianship that was legislated by virtue of Law 4554/2018³. All the provisions of this law are based on the best interests of the child as defined by international conventions, European directives and the Greek legal system. The establishment of guardianship is an important tool since it aims at protecting children who are not protected by their parents. In cases where there is no parental care at all, it is obvious that guardianship is a necessity since it regulates the custody of unaccompanied or separated children and their representation by the law.

(The main provisions of the said law can be found below under the relevant section on guardianship of minors)

As regards the definitions for «unaccompanied child» and «child separated from his family or separated child»

According to article 2 (e) Law 4540/2018 and article 13 para.2 (b) of Law 4554/2018 (O.G. 130 A'), an unaccompanied child is a minor who arrives in Greece without being accompanied by a person who, according to Greek law, exercises parental responsibility or custody, or without being accompanied by an adult relative, who in practice is responsible for the child's care, for as long the exercise of such tasks is not assigned to another person, according to the Law. This definition also includes the minor who stops being accompanied after his/her entry in Greece.

³ Law 4554/2018 (Government Gazette 130 A', 18/07/2018) "Insurance and pension arrangements - Addressing undeclared work - Enhancing employee protection - Unaccompanied minors and other provisions".

According to article 13 para.2 (c) Law 4554/2018 (O.G. 130 A'), a child separated from his family, or separated child, is a minor who arrives in Greece without being accompanied by a person who, according to Greek Law, exercises parental responsibility or custody or without being accompanied by another person entrusted with such responsibility, according to the law. However, the child is accompanied by an adult relative who in practice is responsible for his care.

III. AS TO THE MERITS OF THE ALLEGATIONS IN THE COMPLAINT

The Greek Government wishes to make the following allegations regarding the merits of collective complaint No. 173/2018:

i. As regards the right of children to special protection against physical and moral dangers (article 7 para.10 of the Revised ESC), to social and medical assistance (article 13 of the Revised ESC), the right of the family (article 16 of the Revised ESC) and the right of children (article 17 para.1 of the Revised ESC) to social, legal and economic protection, the right to housing of an adequate standard and provision of shelter (article 31 paras.1 and 3 of the Revised ESC):

A. General Framework for Reception and Accommodation Conditions at Reception and Identification Centers

The Reception and Identification Service (RIS) of the Ministry of Civil Protection⁴, in cooperation with the competent government agencies, international organizations and certified social actors, as appropriate, shall ensure the provision of material reception conditions through national, EU or other resources (article 17 Law 4540/2018). These material reception conditions include housing, food and clothing, provided in kind or as financial allowances or in vouchers, or a combination of the three as well as a daily expenses allowance. Only in duly justified cases, special conditions may exceptionally be laid down by decision of the competent Minister, as regards material reception conditions which are different from the provided ones for a reasonable period which shall be as short as possible when: a) an assessment of the specific needs of the asylum seeker is required or b) housing capacities normally available are temporarily exhausted. (article 18 para.5 Law 4540/2018).

More specifically:

Time for the completion of reception and identification procedures:

The Reception and Identification Centers (RIC) are not detention centers. They are reception centers and temporary accommodation facilities for newcomer third country nationals without legal formalities. The restriction of their freedom for 25 days maximum is absolutely necessary until the completion of reception and identification procedures (see relevant article 14 para. 2 of Law 4375/2016). It is specifically justified and aims at completing reception and identification procedures.

⁴ According to Article 2 par.1 PD 81/19 (Government Gazette 119 A') the Ministry for Civil Protection and the Ministry for Migration Policy were merged into a new Ministry for Civil Protection.

Provision of food services:

Private companies that have signed contracts with the Ministry of National Defense provide food services at the RICs. The RIS personnel contribute to the distribution and control of food portions. The said contracts provide that every beneficiary shall be provided with three meals on a daily basis (breakfast, lunch, dinner) while provision is made for special diet for those who suffer from chronic diseases (for example diabetes), infants and pregnant women.

Provision of interpretation and intercultural mediation services:

The RIC personnel shall distribute brochures already translated in ten languages – dialects. Interpreters are present throughout the procedures followed within the Centers. In case there are third country nationals who speak languages for which no direct interpretation is possible, special equipment for tele-interpretation is available. As regards the current situation, interpretation services are provided by a company, following an international call for tender, as well as by NGOs, while the publication of a new tender for interpretation services for the next two years is pending.

Access to health care services:

As regards the provision of health care services and psychosocial support, the Reception and Identification Centers are staffed with a Team for Medical Examinations and Psychosocial Support that includes doctors, nurses, psychologists, social workers and other specialists such as midwives and pediatricians. The mission of such a team is to carry out medical examinations, provide adequate health care, send patients to the relevant medical units, protect public health against communicable diseases, offer psychosocial support to third country nationals or stateless persons and ensure compliance with hygiene rules in all premises of the center⁵.

Currently and pending recruitments announced by the National Public Health Organisation (EODY) (former KEELPNO)⁶ concerning various vacancies in medical specialties at Facilities falling under RIS's area of administrative competence throughout Greece, under the PHILOS II program, the Ministry of National Defense (military doctors), NGOs and the EODY assist in the coverage of vacancies for healthcare specialties.

Care for female population:

At the Reception and Identification Centers special care is provided for the protection and support to women who are single (unaccompanied) and heads of single parent families or women with other types of vulnerability. It's worth mentioning that in almost all hosting areas provision was made for separate protected areas for women to engage in special activities and to receive support (women safe spaces and mother – baby areas). More specifically, in these areas, protection offered is focused on psychosocial support, counseling, sexual and reproductive health, breastfeeding and also special treatment to women who may have suffered from physical and psychological violence, are victims of exploitation and human trafficking, etc. Moreover, in a large number of

⁵ According to the Ministerial Decision No. Y1.Γ.Π.οικ. 92490 (B' 2745/29.10.2013).

⁶ The National Public Health Organization (EODY) is a Legal Entity under Public Law, established by Law 4600/09-03-19 and supervised by the Ministry of Health. EODY is a universal successor to the existing Center for Disease Control and Prevention (KEELPNO), which was abolished by the aforementioned law.

facilities actions are implemented for women focusing on the development of their skills in order to improve their everyday life and their social integration.

Psychosocial Support-Actions implemented within the Facilities:

Psychosocial support is provided to the residents by specialized personnel (psychologists-social workers) of international and national organizations active inside the Facilities. Such services are provided to all the interested persons individually (men-women- children- unaccompanied children) in special office spaces, through interviews and sessions, under privacy and confidentiality conditions, based on international rules and procedures. Creative learning programs are implemented for children and unaccompanied children, in cooperation with NGOs and International Organisations. Moreover, the availability of communication infrastructure facilitates communication with their families and friends.

Special reference should be made also to the document on «Guidelines on the use of medical and psychosocial vulnerability assessment form»⁷ together with the attached manual «Minimum standards on procedures for a harmonized use of vulnerability forms at RICs», prepared jointly by the Structural Reforms Support Service (SRSS), the Asylum Service, the National Public Health Organisation (EODY) (former KEELPNO) and the European Asylum Support Office (EASO), with a view to achieving an effective and uniform implementation of procedures relating to vulnerability assessment at the existing RICs (on the islands of Lesbos, Kos, Leros, Chios, Samos and at Fylakio Orestiadass in Evros).

Facilities

With a view to continuously upgrading the facilities that fall under its responsibility, the Reception and Identification Service systematically takes the necessary actions in order to prepare the RICs on the Eastern Aegean Islands and the Accommodation Facilities on the mainland, especially in terms of improving building and accommodation facilities inside the centers as well as maintaining the existing facilities. Moreover, in cooperation with the Ministry of National Defense and the International Organisation for Migration, infrastructure improvement projects are in progress, including maintenance of air conditions, projects relating to the sewage system and the electrical installations, etc.

Movements

Furthermore, the Reception and Identification Service makes every effort to speed up procedures to ensure transfer of third country nationals to the mainland (for whom geographical restriction has been lifted), with a view to quickly decongesting the Eastern Aegean Islands and ensuring appropriate living and hygiene conditions. Moreover, at the initiative of the Reception and Identification Service, continuous efforts are made in order to increase the number of accommodation places in mainland facilities, in order to address the basic needs of asylum seekers who are eligible to enter the reception system.

Finally, reference should be made to the publication of the new General Regulation on the Operation of RICs and RIMUs (reception and identification mobile units)⁸.

In accordance with article 22 of Law 4540/2018, the Reception and Identification Service (RIS) is responsible for the reception and identification of unaccompanied children at Reception and Identification Centers.

⁷ Document No. 4/7520/15-04-2019.

⁸ JMD No. 1/7433 (OG B'2219 /10-06-2019).

At Facilities managed by the RIS, accommodation, protection and support to unaccompanied children is offered in a separate delimited zone of each Facility (safe zone), close to the remaining psychosocial services and education areas and away from the general population. Unaccompanied children live alone in small houses opposite the special area prepared to meet their needs for psychosocial support. Food and necessary items are distributed to them separately while care and protection is offered by the specialized personnel on a 24-hour-a-day basis.

As regards reception and identification conditions for unaccompanied children at RICs, in the context of reception and identification procedures as provided for by article 9 of Law 4375/2016, the RIC Team responsible for the Identification and Verification of Citizenship identifies and records the identity and citizenship data of third country nationals or stateless persons who enter the country without legal formalities. If the third country national is found to be a minor who entered the country without being accompanied by a person exercising parental responsibility, according to the Greek law, or by another person assigned with such responsibility, according to the law, then the minor receives specialized care in accordance with the law, i.e.:

- Informing the local competent Public Prosecutor for Minors or the Public Prosecutor's Office at the Court of First Instance. The public prosecutor, acting as temporary guardian until the appointment of a permanent guardian, shall ensure the immediate appointment of an appropriate natural person to legally represent the unaccompanied child and take the necessary actions especially those provided by article 44 of Law 4375/2016 (A' 51).
- Cooperation with the competent authority for the protection of unaccompanied and separated children, i.e., the General Directorate for Social Solidarity of the Ministry of Labour, Social Security and Social Solidarity (article 22, para. 3 Law 4540/2018, A' 91).
- Assistance offered by a guardian, if appointed.
- Operation of reception units for the education of refugees in order to facilitate their integration into the public education system.
- Referral to the National Center for Social Solidarity (EKKA) in order to find a suitable hosting facility for unaccompanied children.
- Appropriate accommodation facilities for unaccompanied children in separate areas inside the RIC (safe zones).
- Carrying out by priority of medical examinations and vulnerability assessment and providing psychosocial support.
- Referral by priority to the local competent Regional Asylum Office/Independent Asylum Team, especially in cases of family reunification under the Dublin III Regulation.
- Further handling of the case of an unaccompanied child in cooperation with bodies specialized in child protection and provision of specialized psychosocial support, access to education and recreational activities, and access to legal aid during their stay at the RIC till their referral to an adequate accommodation facility.
- Upon finding a place in an appropriate accommodation facility for unaccompanied children (placement by the EKKA), preparation for the child's transfer: carrying out the necessary medical examinations, communicating with the local competent Public Prosecutor, cooperating with other bodies (for example the NGO Metadrasi) that will accompany the unaccompanied child.

In any case, every RIC or Facility informs the competent Public Prosecutor on the presence of an unaccompanied child within the RIC, on the procedure followed in order to determine his age and on any changes that may occur during the child's stay at the RIC/Facility.

More specifically:

a) According to our latest information from the **Lesbos RIC** Administration, 346 unaccompanied children are accommodated at the Center⁹. The total number of children within the RIC amounts to 1.710.

The above mentioned areas are designed in such a way to provide children the best possible living conditions, according to articles 11.3, 23.1, 23.2, 24.2 of Directive 2013.33.EU on the Reception and No 21, 22, 36 and (e) of Law 4540/2018 for the short time period during which children must stay at the RIC until the procedures for their identification, the medical checkup to determine their age, if necessary, are finalized and of course until the decision is forwarded to the RIC for their placement in a proper accommodation facility or their transfer to another European country based on the Dublin III Regulation. As regards children who will be placed at accommodation facilities through the EKKA, the said time period ranges from two to three months, while for children who wish to reunite with their relatives in Europe, almost twelve months are needed due to the bureaucracy between the services involved. Obviously, these children do not stay at the RIC throughout the entire above period. Children for whom there is no pending application under the Dublin III Regulation may be given priority in being promoted to appropriate facilities.

When the EKKA forwards to the RIC the decision for their placement at an accommodation facility for minors on the island or on the mainland, a short time period is needed, around five days, for the Public Prosecutor's Office at Mytilini Court of First Instance to issue the orders, for the Regional Asylum Office to issue the asylum seekers' cards and to finalize the necessary medical examinations prior to their transfer to facilities for minors (it is estimated that another five days are needed for Mantoux tests, chest x-rays and examinations for psoriasis that are carried out of the Center, at the I.K.A. – P.E.D.Y. of Mytilini).

Children are fed by the ELAITIS private catering company, they are offered three meals on a daily basis as well as other necessities upon their arrival that are renewed on a weekly (personal hygiene products) and monthly basis (cloths, underwear, shoes, Non Food Items).

The RIC Administration ensures that accommodated minors have access also to other provisions that ensure a dignified standard of living, in accordance with the law¹⁰. More specifically, children have access to education and recreational activities in cooperation with NGOs that operate within the RIC. On a daily basis, *Metadrasi*, *Iliaktida* and *Better Days* NGOs offer courses of Greek and English language, while *Metadrasi* and *Siniparxi* NGOs organise excursions for children inside and outside the city with the provision of a meal. *Iliaktida* NGO in cooperation with UNICEF teaches craft classes at TAPUAT child and family support hub. Moreover, computer classes are offered by the NGOs *Movement on the Ground* and *Siniparxi*, music classes by the NGO *Connect by Music*, sports classes by the NGOs *Movement on the Ground*, *Help International* and *Siniparxi* and sometimes, educational seminars such as the recent seminar organized by KE.THE.A (Therapy Center for Dependent Individuals) in cooperation with *Starfish* NGO. In all the above mentioned activities, children are accompanied by RIC employees while the Public Prosecutor's Office at Mytilini Court of First Instance is also informed of.

As regards their health care, in addition to EODY (former KE.EL.P.NO.) that operates within the RIC, the following NGOs offer medical services: *Kitrinos Healthcare* and *Boat*

⁹ 134 at Wing A, 124 at Wing B, 43 at the Safe Zone, 15 of which are girls, 43 at the Tent for New Commers where they stay temporarily for a period of less than one month and 1 at the main area of the Center together with a relative until the procedures for the child's custody are finalized.

¹⁰ Articles 14.1, 14.2, 23.3. of European Directive 2013/33/EU and article 13 of Law 4540/2018.

Refugee Foundation. However, children can visit the MSF doctors (*Medecins Sans Frontieres*) outside the Center, the Bostanio public hospital of Mytilini and the I.K.A. - P.E.D.Y. units accompanied by nurses (7 employees with fixed-term contracts), who ensure that the special needs of these children are met on a daily basis. The RIC also has a psychologist, while there is an additional psychologist of the International Organisation for Migration for children at the Safe Zone as well as 5 social workers. It's worth mentioning that within the RIC a special SBGV office now operates which is staffed by RIC employees in cooperation with the Hellenic Police, the U.N.H.C.R. and Diotima NGO for the identification and subsequent referral of possible victims of sexual and gender-based violence to the relevant authorities.

As regards legal aid offered to children, they are initially informed by the U.N.H.C.R. on their rights and guided as regards the procedures for their family reunification by the Secretariat for Unaccompanied Children (Office for the Reception of Children) that takes record of their requests, informs them on procedural and legal issues, helps them to collect documents, communicates with the National Dublin Unit, if necessary, with regard to the deadlines and of course, cooperates with childrens' guardians appointed by *Metadrasis* NGO. Moreover, the RIC is staffed by a jurist who is an employee of the European Asylum Support Office in order to assist the Secretariat for Unaccompanied Children and another jurist who is an employee of the International Organisation for Migration responsible for children living at the Safe Zone.

The wings dedicated to minors are guarded on a daily basis by the Hellenic Police staff and RIC employees from 07.00 till 22.00 and later by *Eurorelief* NGO (22.00 - 00.00). The Safe Zone, for which RIC is in close cooperation with the International Organisation for Migration and *Iliaktida* NGO, is guarded by caregivers on a 24 hour basis since the needs for protection are increased (minors below the age of 15 as well as unaccompanied under-aged girls are accommodated in that zone).

The Secretariat for Unaccompanied Children as well as other RIC Offices responsible for under-aged third country nationals, inform on a regular basis the Public Prosecutor's Office at Mytilini Court of First Instance (as temporary guardian) on children's movements and other important issues in accordance with article 22.1 and 22.2 of Law 4540/2018. Moreover, the certified guardians of *Metadrasis* NGO undertake the guardianship of all children under the age of 15.

Children undergo by priority the initial medical examinations, despite the huge flow of refugees on the island of Lesbos, in accordance with article 3.5 of Ministerial decision No. 92490.2013. When in doubt, their age is determined in accordance with paras. A3 and A8-9 of JMD 1982.2016 and article 6 para. 3-10 of MD 92490/2013 on the conduct of examinations by a doctor (currently examinations are conducted by an EODY Team assisted by two military general practitioners, 10 nurses, 3 psychologists and 3 social workers). With assistance offered by the UNHCR, children with additional vulnerability indicators are transferred in time to proper facilities on the mainland in order to safeguard their easier access to more services.

The most important issue is the decongestion of the islands and the transfer of third-country nationals (children and adults) towards the mainland, under better living conditions. This objective is achieved rapidly since mid-2018. However, the transfer of children depends on the availability of the already existing facilities while the EKKA must weigh the transfer requests, and therefore the time for their transfer cannot be solely decided upon by the RIC.

Finally, it should be noted that, in compliance with article 22.4 of Law 4540/2018, the RIC personnel responsible for children is trained continuously through seminars, the latest of which being the seminar organized by the European Asylum Support Office in October 2018 on reception procedures and a seminar organized by the EKDA in November 2018.

Children who live with their families are offered the same education and recreational activities mentioned above for the unaccompanied children. They are accommodated

either in ISOBOX type containers or in big tents suitable for winter that are equipped with a floor, waterproof cover and heating, and with internal partitions ensuring the privacy of family life. Unfortunately a number of families build makeshift accommodation outside the Center in order to have more space. These are constantly removed by the RIC personnel since they are dangerous not only for their safety but for the safety of the other residents. For example they try to construct internal improvised electricity systems. At this point we have to mention that now the Center is equipped with a large number of shared toilets and showers with hot water sufficient enough to accommodate the 5.150 people who live inside the Center. Moreover, in addition to the solar water heaters, pellet fuel burners are now installed in order to have constant supply of hot water.

b) as regards the **RIC in Samos** we would like to inform you that the competent Ministry shall relocate/transfer the Samos Reception and Identification Center to a new location. As a result the decision is published to lease a property in Zervos region for the development of a RIC that will accommodate 1200 people. During the last months, in an effort to decongest Samos RIC, a number of transfers have taken place out of the RIC and from the island of Samos towards the mainland. More specifically, in the previous period, the following number of refugees left the Center in an effort to decongest the Samos RIC: August: 341, September: 807, October: 763, November: 989, December: 1191, January: 416, February: 208, March: 43 according to the last update on 08/03/2019, while the transfer procedure is in progress.

Regarding the measures envisaged in order to improve the living conditions of third country nationals at Samos RIC, currently, in cooperation with other authorities such as the Asylum Service, the Hellenic Police, the European Asylum Support Office (EASO), a safe zone support project is implemented for unaccompanied children with the assistance of specialized personnel and the replacement of old houses by the International Organisation for Migration and the European Asylum Support Office (EASO).

B. Guardianship for Unaccompanied Children

The Ministry of Labour has adopted legislation on guardianship for unaccompanied children and children separated from their families. This refers to Law 4554/2018, on «*Social Security and Pension Regulations – Addressing undeclared work – Enhancing workers’ protection – Guardianship for unaccompanied children and other provisions*», which was adopted in July 2018 and is based on the principle of the best interests of the child, as defined by international conventions, European directives and the Greek legal system.

According to this law, the National Center for Social Solidarity (EKKA) is designated as the official authority that will nominate a professional guardian, if there is no other appropriate natural person to be appointed as guardian, in accordance with the definitions of article 1592 of the Civil Code¹¹. The procedure for the selection of professional guardians is provided in article 28 of Law 4554/2018, and in the relevant JMD that has already been issued. Through the National Program of the Asylum, Migration and Integration Fund, the EKKA has ensured funding for the recruitment of 180 professional guardians and 20 coordinators who will assist them. It also takes all

¹¹ From 22/08/2018, the National Center for Social Solidarity is responsible for all referrals of unaccompanied children (from Reception and Identification Centers (RIC), Police Departments, Safe Zones, facilities of the International Organisation for Migration , etc). Homeless children are also referred to the EKKA.

the necessary actions in order to finalize their recruitment and required training till the entry into force of the law, i.e. the 1st of March 2020.

The law provides, inter alia, for the following: guardians' appointment and replacement procedure (articles 16 and 17), their responsibilities (article 18)¹², establishment, formation and functioning of the Supervisory Guardianship Board for Unaccompanied Children (article 19), issues relating to unaccompanied children's standards of living with third parties (article 20), assessment and identification of the best interests of unaccompanied children (article 21), responsibilities of a professional guardian (article 23), register of unaccompanied children, professional guardians and accommodation centers for unaccompanied children (articles 24, 25 and 26), establishment of a Department for the Protection of Unaccompanied Children at EKKA (article 27), professional guardians' selection procedure (article 28), suspension, and termination of guardianship (article 29).

The regulating framework of guardianship for unaccompanied children is now finalized, as provided in Part C of Law 4554/2018, after the adoption of the following regulatory instruments:

- Ministerial Decision No. Δ11/28925/1169 (O.G. 2890 B'/5-7-2019) was issued approving the *Rules of Procedure of the Supervisory Guardianship Board for Unaccompanied Children* in accordance with article 19 Law 4554/2018
- Ministerial Decision No. Δ11/οικ.26943/1073 (O.G. 2474 B'/24-6-2019) was issued *on the establishment and operation of the EKKA Register of Unaccompanied Children* in accordance with article 24 Law 4554/2018
- Joint Ministerial Decision No. Δ11/οικ.28304/1154 (O.G. 2725 B'/2-7-2019) was issued *on the establishment and operation of the EKKA Register of Professional Guardians* in accordance with article 25 Law 4554/2018
- Ministerial Decision No. Δ11/οικ.26945/1074 (O.G. B 2399/ 19-6-2019 and correction O.G. B 3211/22-8-2019) was issued *on the establishment and operation of the EKKA Register of Accommodation Centers for Unaccompanied Children* in accordance with article 26 Law 4554/2018
- Joint Ministerial Decision No. Δ11/οικ.28303/1153 (O.G. 2558 B'/27-6-2019) was issued *on the selection procedure for professional guardians* in accordance with article 28 Law 4554/2018.

It has to be noted that under article 73 of Law 4623/2019 (A' 134), the entry into force of guardianship regulatory framework is amended. More specifically the law shall enter into force on the 1st of March 2020.

Moreover, it is the first time that standard assessment procedures are established for the best interests of unaccompanied children. More specifically, the said procedures are included in the Rules of Procedure of the Supervisory Guardianship Board for

¹² The guardian's responsibilities are the following, inter alia: ensuring their daily basic survival needs, representing and assisting the child in all judicial and administrative procedures, accompanying the child to Health Units for health care, exercising the provided remedies against administrative or court decisions relating to the child, guaranteeing that the child is safe during his/her stay in the country and during the procedures for his/her return to the country of origin, ensuring psychological support and health care to the child, ensuring that the child has access to education, ensuring for appropriate reception and accommodation conditions. See article 18 Law 4554/2018.

Unaccompanied Children (see article 21 – Assessment and determination of the best interests of an unaccompanied child as well as the relevant annex to the Rules).

Moreover, the competent authority of the Asylum, Migration and Integration Fund published a call entitled: Guardianship Program for Unaccompanied Children¹³, in the context of which the National Center for Social Solidarity filed an application for funding while the relevant agreement for funding the action¹⁴ is already published.

The Ministry, in addition to working on the secondary legislation and preparing actions-procedures on the part of the State in order to activate the regulatory framework of guardianship for unaccompanied children, proceeded with the process of signing a tripartite agreement with the UNHCR for Refugees and *METAdrasi* NGO for the implementation of a transitional guardianship program. The National Center for Social Solidarity is the partner to this agreement through the Ministry.

The transitional program started in January 2019 and currently, actions are taken to continue the program till the institutional guardianship framework starts being implemented. In this program, up to 55 Authorised Representatives will gradually be employed. The program aims at meeting the needs for guardianship of almost 1.600 unaccompanied children who live in Greece (in protective custody, in Reception and Identification Centers, hospitals, accommodation centers, semi-independent living flats and temporary accommodation solutions such as hotels and safe zones) and ensuring the smooth and gradual transition to the new framework. It has to be noted that the term «Authorized Representative» is used because these persons do not have the responsibilities of a guardian, based on the Civil Code, however, responsibilities are delegated to them, on a case by case basis, following prosecutor's orders. The authorized representatives are employed under contract by *METAdrasi* NGO, which is one of the tripartite agreement's partners.

Moreover, according to article 27 Law 4554/2018, the Directorate for the Protection of Unaccompanied Children is established at the National Center for Social Solidarity which includes the following Departments:

- a. Department for coordination, support and assessment of professional guardians of unaccompanied children (please note that the guardianship program for unaccompanied children also includes ways to enhance the department's staffing)
- b. Department for handling of housing requests for unaccompanied children and
- c. Department for assessment and supervision of accommodation centers for unaccompanied children

It's worth taking into account that under the Law 4538/18 «*Measures for the promotion of foster care and adoption and other provisions*» and Law 4540/2018 «*.....reception of applicants for international protectionamending asylum procedures and other provisions.....*»¹⁵, and Law 4554/2018, provision is made for unaccompanied children to benefit from the national foster care system. Foster care is one of the main and important

¹³ <https://www.amifisf.gr/prosklisi/programma-epitropeias-asynodeyton-anilikon/>

¹⁴ Ref No. 1719/Φ.34/5-7-2019, ΑΔΑ:ΨΡ20465ΧΙ8ΥΙΘ

¹⁵ The full title of Law 4540/2018 is «*Adaptation of the Greek legislation to the provisions of Directive 2013/33/EU of the European Parliament and of the Council of 26 June 2013, on the requirements for the reception of applicants for international protection (recast, L 180/96/29.6.2013) and other provisions – Amendment of Law 4251/2014 (A' 80) on the adaptation of the Greek legislation to Directive 2014/66/EU of 15 May 2014 of the European Parliament and of the Council on the conditions of entry and residence of third-country nationals in the framework of an intra-corporate transfer – Amending asylum procedures and other provisions*».

child protection institutions aiming at family rehabilitation of children who need special care by the state.

C. As regards accommodation places for unaccompanied minors

Accommodation centers (shelters) for unaccompanied minors represent the majority of accommodation places for unaccompanied minors (1.173 places in total-EKKA Dashboard 31-8-2019) and have been operating in full capacity. Consultations are underway by the relevant ministries, National Centre for Social Solidarity (EKKA) and AMIF Fund in order to further increase the existing number of available places in accommodation centers. Additionally, Semi-independent living (SIL) for unaccompanied children 16-18 years old has been operating as an alternative long-term accommodation scheme on a pilot basis in Greece since January 2018 and the legal regulatory framework is under development. Currently, there are 56 SIL places (EKKA Dashboard 31-8-2019) while the plan is to scale-up the scheme and develop in total 260 places in SIL by the end of 2019. Also, Safe zones and Hotels are temporary/emergency spaces used as alternative to detention while priority for placements is also given to children residing in RICs.

In addition, article 22 of Law 4540/2018, provides for the adoption of a Ministerial Decision stipulating the supervisory bodies, the minimum standards and the predicted conditions and procedures for the selection, referral, stay and completion of the provided accommodation and any other necessary detail concerning the accommodation of the unaccompanied minors who have reached the age of sixteen at supervised flats, which cover their basic needs, such as food and shelter, as well as pharmaceutical care, while in parallel, they are given the possibility of autonomy and integration into the social fabric, creating thereby prospects for the future.

During the previous period, the temporary accommodation of unaccompanied minors in hotels managed by the International Organization for Migration has been developed. Their operation has been approved by the end of March 2019. The Ministry of Labour and Social Affairs, in the context of a strategic exit, has requested the European Commission to extend the operation of these hotels, but with the view to progressively reduce their operation and accommodate unaccompanied minors, having reached the age of 16, in supervised semi-independent living flats. The Ministry takes into account the needs for accommodation and the procedures and actions required to cease the operation of these hotels until October 2019. For the current period and on the basis of increased flows, the Ministry has submitted a new request to the EU (DG Home) as regards the full operation of the 14 hotels (540 places) by the end of the year at least, while at the same time it works on updating and reforming the strategic plan to be submitted to the EU on meeting the needs of accommodation for unaccompanied minors.

ii. As regards the right to education for children and young people/ unaccompanied minors (article 17 para. 2 of the Revised European Social Charter)

According to article 13 of Law 4540/2018, minor citizens of third countries or stateless persons, while staying in the country, they have access to the public education system, under conditions similar to those applicable to Greek citizens and shall be entitled to facilitations relating to registration, in case of difficulties in submitting the required supporting documents, and as long as no pending expulsion measure is taken against them or against their parents.

Public administration aims at facilitating the registration of children in the public education system in the event of difficulties when submitting the necessary documents and their integration into the education system no later than three months after the date on which their identification is finalized. Creating Reception Units for the Education of Refugee Children (D.Y.E.P) in the islands in order to facilitate their integration into the public education system.

The Ministry of Education, Research and Religious Affairs from spring 2016 till today, based on special planning, has ensured the integration of transferred refugee children in Greek education system by implementing a flexible action plan, taking into account the following factors:

- Implementation of a demanding project, under time pressure conditions.
- Unstable population as regards the number, the place of residence and living conditions in the country.
- Refugees of various nationalities with different social and cultural characteristics as well as different financial and educational attainment.

The institutional framework of Greek education system provides the following tools for the integration of refugee children:

- Reception Units for the Education of Refugee Children and Education Coordinators for Refugees¹⁶
- Reception Classes within the Priority Education Zones (Z.E.P.¹⁷)
- Intercultural Schools¹⁸

In light of the above and under the above institutional framework, we would like to point out the following:

The education of under-aged refugee children is provided by Primary and Secondary Education school units of the standard education system under the terms, conditions and procedures of the current legislation.

By way of exception, and taking into account the special needs of refugee populations due to their mobility, the time of their arrival and the duration of their stay in

¹⁶ Reception Units for the Education of Refugee Children (D.Y.E.P) – Law 4547/2018 (O.G.102 A’), as amended by article 66 of Law 4559/2018

¹⁷ N.3879/10 (O.G. 163 A’), together with the Ministerial Decisions and Circulars on its application

¹⁸ Law 4415/2016 (O.G. 159’ A’)

accommodation facilities, as well as the size of student population, Reception Units for the Education of Refugee Children (D.Y.E.P.) may be established that operate in the context of the standard education system and apply specialized curricula of limited duration.

Through the specialized curricula tailored to their needs, children familiarize with the school environment and develop abilities and skills that will help them through their school life, whether they stay in Greece or leave for another country.

At this point it should be noted that special emphasis is placed on preschool children in Public Kinderdarters (DYEP) that operate within the Accommodation Centers, the number of which amounts to 30 units for the current school year.

Moreover, in order to monitor and coordinate the entire program, permanent teachers have been placed at Accommodation Facilities/Centers as Education Coordinators for Refugees (SEP) throughout the country, who will become the link between refugee populations and school units. This is an innovative institution that ensures the accessibility of children to education and contributes to a large degree to the successful implementation of the program.

A large number of children live in Accommodation Centers or Facilities within the urban fabric, and following Greek language test, they study in Primary and Secondary Education Units that form part of the Educational Priority Zones, depending on their age. In these school units "Reception Classes" may operate in order to offer language and learning assistance to pupils who have no or minimum knowledge of Greek.

During the 2018-2019 school year, the integration of all refugee and migrant children into schools was, for another year, the main objective of the Ministry of Education, placing special emphasis on the enhancement of education procedures for the smooth transition of most children to morning classes.

However, the afternoon Reception Units for the Education of Refugee Children (DYEP) still operate, maintaining their clear pre-integration role, so that newcomer refugee pupils are familiarized with school life, taking into account their special education needs.

For the 2018-19 school year, the total number of refugee pupils registered in Greek public schools of both education levels amounts to 12.867 children¹⁹.

TOTAL NUMBER OF PRIMARY AND SECONDARY SCHOOL PUPILS REGISTERED IN DYEP: 4.577		
KINDERGARTEN	PRIMARY SCHOOL	JUNIOR HIGH SCHOOL
1506 pupils	2267 pupils	804 students

¹⁹ Ministry of Education: information system - my school/June 2019.

TOTAL NUMBER OF PUPILS APPLICANTS/BENEFICIARIES OF INTERNATIONAL PROTECTION REGISTERED IN PRIMARY AND SECONDARY SCHOOL UNITS WITH RECEPTION CLASSES: 4.050		
KINDERGARTEN	JUNIOR HIGH SCHOOL	SENIOR HIGH SCHOOL
1774 pupils	807 students	1469 students

TOTAL NUMBER OF PUPILS APPLICANTS/BENEFICIARIES OF INTERNATIONAL PROTECTION REGISTERED IN PRIMARY AND SECONDARY SCHOOL UNITS WITHOUT RECEPTION CLASSES: 4.240		
KINDERGARTEN	JUNIOR HIGH SCHOOL	SENIOR HIGH SCHOOL
3264 pupils	687 students	289 students

TOTAL NUMBER OF REFUGEE STUDENTS REGISTERED IN ALL EDUCATIONAL SCALES THROUGH THE SCHOOL YEAR 2018-19: 12.867				
2018-2019	Total of pupils in DYEP classes	Total of pupils in Reception Classes	Total of pupils in school units without reception classes	Total of refugee students
	4.577	4.050	4.240	12.867

iii. As regards the right to health protection for unaccompanied children/ minors (article 11 of the Revised European Social Charter)

The refugee crisis is a major challenge for health authorities in terms of controlling communicable diseases, strengthening health care infrastructures and reducing health

inequalities. Greece is facing the consequences of a prolonged and severe economic crisis that has inevitably affected the public health care system²⁰.

The response to the urgent healthcare needs of refugees and immigrants is a challenge for the healthcare system that does not have sufficient resources and staff and is already overwhelmed.

In spite of the difficult situation as described above, a large part of the population trapped in the country is being hospitalized, receiving primary health care, public health services, is being offered vaccination, psychosocial support, first aid, emergency care and medical transfers by the National Health System (ESY), the National Primary Health Care Network (PEDY) and the National Emergency Aid Centre (EKAB). All the above are public bodies supervised by the Ministry of Health.

The Ministry of Health has given priority to medical coverage of both unaccompanied and accompanied refugee children and immigrants. The health needs of these vulnerable groups are fully covered by the public health system. According to article 33 of Law 468/2016 (OG 21 A') they have the right to access and the right to full nursing and medical care and they are also given a registered Social Security Number (AMKA)²¹.

Nursing care is provided by the Hospitals of the Legislative Decree 2592/1953 (OG A' 254) the nursing institutions supervised and sponsored by the Ministry of Health, the Mental Health Units supervised and sponsored by the Ministry of Health, by Law 2716/1999 (OG A' 96), the Primary Health Care Units of the National Health System, the Hospitals supervised and sponsored by the Ministry of Education, Research and Religious Affairs, the Municipal Offices, and also through the rehabilitation and social care institutions supervised by the Ministry of Labour and Social Affairs. Pharmaceutical care is provided by private pharmacies contracted with the National Organization for the Provision of Healthcare Services (EOPYY). High-cost medicines that fall within the scope of article 12 of Law 3816/2010 (OG 6 A') are exclusively provided by Hospitals' and EOPYY's pharmacies.

From August 2017 until 19/08/2018, the main action of the Ministry of Health for dealing with the health and psychosocial needs of the refugee population was the PHILOS program, an "Integrated Emergency Health Intervention for the Refugee Crisis". The implementation of the PHILOS II program was assigned to the Centre for Diseases Control and Prevention (KEELPNO) and the program is currently entering its second phase of implementation²².

²⁰ It should be noted that public health expenditure in Greece, as a percentage of GDP according to Eurostat 2015 data, stood at 8.3%, while the EU average amounted to 9.9%, having decreased by 22.4% since 2011.

https://ec.europa.eu/eurostat/statistics-explained/index.php/Healthcare_expenditure_statistics

²¹ See the No.7791/245/Φ8321/1-4-2009 Joint Ministerial Decision

²² By virtue of the Γ.Π. οικ.64186/2018 (OG B' 3877/9-6-2018) Joint Ministerial Decision, adopted in accordance with article 123 of Law 4549/2018 (OG A' 105)

The overall objective of the project was to reduce the health risks of the refugee population and the host communities in the mainland and at the Reception and Identification Centers (RICs) by providing first aid, medical referral service and improving health conditions at the accommodation centers and since August 2017 at the points of entry into the islands of Lesbos, Kos, Chios, Samos and Leros.

Access to protection, via community strengthening, women and children protection, was one of the main strategic goals of the project.

As regards the improvement of the hygiene conditions for the centers' population, efforts are focused on vulnerable groups such as pregnant women, breast-feeding women and children. The general strategy was to supply the necessary scientific tools in order to provide health services to refugees at the Reception and Identification Centers (RICs) and in the mainland accommodation centers. Specifically, these activities included tools for medical/ psychosocial examination, health and hygiene protection (sexual and gender-based violence-SGBV, mother/child care), environmental hygiene, operation indicators of accommodation centers, vulnerability assessment and referral services. Due to the number of new arrivals, this operational strategy was designed in such a way as to be flexible and adaptable, but also to provide services to the refugee community.

The activities were focused on the population of 25 centers that continued to exist in the mainland until 2017 and at all five (5) RICs. At the same time, emergency intervention teams provided significant assistance to the refugees both at the accommodation centers and at the RICs.

The population had access to first aid through 25 medical posts and to referral services with eight (8) mobile units.

A total of 231 healthcare workers (1st, 2nd, 3rd sub-project) were trained on the above issues. In addition, the RIC staff was trained in vulnerability assessment (SGBV protocol-sexual and gender based violence/ recognition, sexually transmitted diseases and PEP, human trafficking indicators, SRH, age assessment) and vulnerability categories under Greek legislation (Law 4375/2016).

Staff training: A non-skilled staff was recruited, not formally trained but having acquired valuable skills to perform certain tasks via experience and training. 131 workers at the health sector participated in 76 seminars on various topics.

The following protocols/ templates were developed simultaneously:

- Syndromic surveillance protocol
- SGBV Protocol-forms,
- Hunger strike protocol – documents,
- Tuberculosis control protocol,
- Vulnerability assessment protocol.

Vulnerability Assessment at RICs

The vulnerability assessment protocol has been developed to enhance the capacity of workers at the healthcare sector frontline to effectively assist vulnerable migrants/ asylum seekers at mixed migration flows and objectively assess workers at the Reception and Identification Services. The template is intended to help employees effectively identify and refer the individuals in need of protection. The tool is designed to achieve the following:

- Strengthening health workers' awareness about the international and national legal framework for vulnerable refugees.

- Facilitate identification procedures and referral systems.

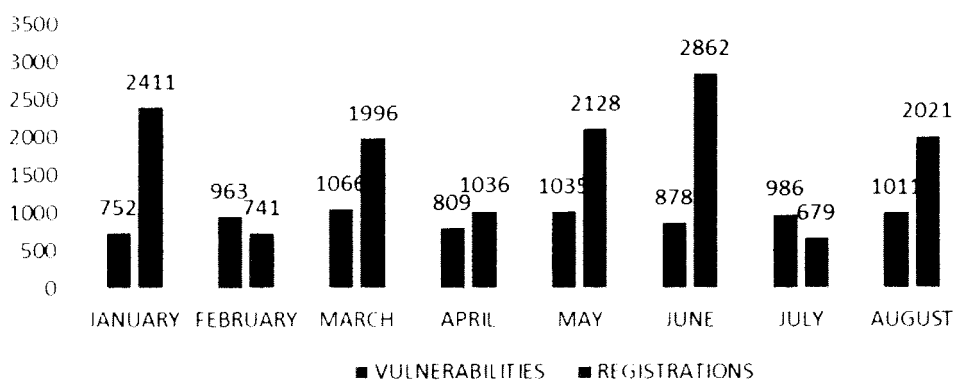
KEELPNO has participated in health care in the islands since the summer of 2017. The vulnerability assessment protocol was developed in cooperation with EASO, RIS, the asylum service and the Committee supervising the EU-Turkey agreement.

Training on vulnerability assessment and tools for gender-based violence, as well as on sexual and reproductive health, was conducted in the islands of Lesbos, Kos, Samos and Chios, funded by the UNFPA. As a consequence, for the first time the vulnerability assessment followed a common procedure in all the islands.

Data on vulnerability: August 2017-December 2017: 2619 people were assessed as being in a vulnerable situation, most of whom were survivors of gender and physical violence, pregnant and unaccompanied minors. From January 2018, the new protocol is followed in the vulnerability assessment. The data are as follows:

JAN-AUG 2018	JAN.	FEB.	MAR.	APR.	MAY	JUNE	JULY	AUG.
ASSESSED VULNERABILITIES	752	963	1066	809	1035	878	986	1011
REGISTRATIONS	2411	741	1996	1036	2128	2862	679	2021

VULNERABILITIES_RICs_ISLANDS_JANUARY_AUGUST 2018-PHILOS



According to data, the most common categories refer to physical and gender-based violence, unaccompanied minors, pregnant and people with severe illnesses/disabilities, with those of mental health to predominate.

Data on the age assessment at the reception and identification centers (RICs) of the islands

JANUARY-AUGUST 2018

JANUARY	FEBR.	MAR.	APR.	MAY	JUNE	JULY	AUGUST
65	54	97	102	109	119	111	119

Primary care provision at the Reception and Identification Centers (RICs)

JANYARY-AUGUST 2018

JANUARY	FEBR.	MAR.	APR.	MAY	JUNE	JULY	AUGUST
4805	5124	1311	4007	2197	2318	1460	1950

PHILOS staff in the islands

The staff (doctors, nurses, social workers, psychologists, mediators, midwives) hired specifically for the islands is as follows:

Island	Number
CHIOS	17
KOS	11
SAMOS	15
LEROS	15
LESVOS	16

The staff of the new program is as follows: 1 Coordinator, 1 Medical Coordinator, 5 Field Coordinators, 17 General Practitioners, 5 Psychiatrists, 6 Paediatricians, 28 Psychologists, 12 Midwives, 28 Nurses, 1 Social Worker, 35 Mediators

In relation to the vaccination coverage of refugees and immigrants since the onset of the refugee crisis an important effort is made to fully implement the National Vaccination Program with priority given to individuals under 15 years of age. In total, from March 2016 to February 2019, approximately 121,115 vaccinations were conducted with priority vaccines. At the same time, efforts are being made to gradually implement the entire National Vaccination Program in the context of the regular provision of primary health care. In addition to childhood immunizations at the points of entry, the required documents for school enrollment are provided (Article 11).

According to data from the National Center for Health Care Operations (EKEPY), from 01/03/2016 to 31/12/2018, 1/3 of incoming cases in public health services concern persons under 15 years of age and amount to 46.378.

Specifically, in 2017 and 2018, the Hospitals located in Northeast Aegean islands provided the following services free of charge:

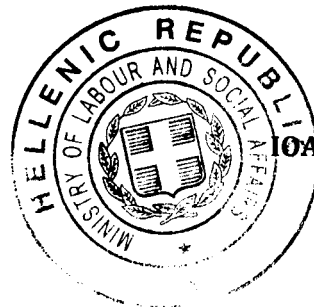
- At the Hospital of Samos, in 2017, 737 minors were examined at the outpatient clinics and 39 were admitted to the hospital, whereas in 2018, 1927 minors were examined and 96 were being hospitalized. The leading causes of hospitalization were acute upper respiratory tract infections, fever, gastroenteritis, viral infections.

- At the Hospital of Chios, in 2018, 159 immigrant refugee minors were admitted to the Emergency, whereas a total of 187 minors were hospitalized, counting a total of 677 days of hospitalization.
- At the Hospital of Leros, in 2017, 624 children were examined as outpatients and 27 were admitted, whereas in 2018, 1.184 minors were examined and 23 were being hospitalized.
- At the Hospital of Mytilene, in 2017, 1.676 minor refugees were admitted for examinations, 635 of whom were admitted for hospitalization. In 2018, 3.329 minor refugees were admitted, 1.233 of whom were being hospitalized.

IV. CONCLUSION

The Greek Government is making great efforts at a particularly difficult time, where the country is receiving waves of migratory flows (especially during the period of summer). Addressing the needs of unaccompanied minors, as well as other vulnerable groups of immigrants and refugees, is both a priority and a challenge for the Greek Government, which is called upon, in a given space and time, to cope with all the parameters of a very demanding and sensitive issue of human rights protection, that of unaccompanied children entering the country.

The Greek Government calls on the European Committee of Social Rights to take into account all the above, together with the extraordinary nature of the situation and the circumstances surrounding it, in order to hold that the complaint under consideration is unfounded.



THE MINISTER

IOANNIS BROUTSIS