



**Comments submitted by Greece
on GREVIO's final report on the implementation
of the Council of Europe Convention
on preventing and combating violence
against women and domestic violence
(Baseline Report)**

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MINISTRY FOR
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GENERAL SECRETARIAT FOR
EQUALITY AND HUMAN RIGHTS

GREECE'S COMMENTS ON GREVIO'S FINAL EVALUATION REPORT

ATHENS, NOVEMBER 2023

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INTRODUCTION

The Greek Government signed the Istanbul Convention in 2011 and acknowledged the importance of its implementation by its ratification on the 8th of March 2018 (Law 4531/2018).

On February 2023, the Council of Europe Group of Experts on Action against Violence and Domestic Violence (GREVIO) conducted the first evaluation visit, during which the delegation had the chance to discuss the issues set by the provisions of the Convention with the Greek authorities, NGOs and national human rights institutions. As a result of this visit, GREVIO adopted on October 26th its 1st Final Evaluation Report for Greece. The Government would like to take this opportunity and express its appreciation to GREVIO as well as the Secretariat for their work in conducting the first evaluation procedure concerning Greece. It appreciates the dialogue that it has been able to engage in with GREVIO and the spirit of openness and cooperation during the evaluation.

The Greek Government welcomes the Final Evaluation Report by GREVIO and would like to declare its commitment to the implementation of the Istanbul Convention. It also notes with satisfaction that a large part of our comments to the draft report has been taken into account in the final report and that the report highlights a good number of positive and promising legal and policy measures adopted by the Greek Government in the areas of preventing and combating violence against women and domestic violence.

At the same time, the Greek Government has taken due note of the recommendations and proposals provided by GREVIO and welcomes the opportunity to comment on the final report, where necessary. All recommendations provided by GREVIO are duly noted and will serve as important guidelines in future policy planning through synergies with all relevant stakeholders. At this point, it should be mentioned that after the national elections of June 2023, gender equality issues were integrated into the portfolio of the newly established Ministry of Social Cohesion and Family, marking the governmental engagement to unify into one ministry social protection and welfare policies' coordination and implementation. Thus, creating an efficient, coordinated and cohesive administrative mechanism that ensures effective policy design and implementation of social services. The new ministry consists of three pillars: (a) solidarity / welfare and poverty fighting policies, (b) gender equality and human rights and (c) demographic and housing policies. The competent governmental agency for gender equality is renamed General Secretariat for Equality and Human Rights (GSEHR) with a more extended portfolio and with the prevention and combating of gender-based violence among top priorities. Therefore, the Commitment of the Greek government to gender equality and gender – sensitive approach to violence against women was established as a top priority with the establishment of the Ministry of Social Cohesion and Family Affairs.

The Government is of the opinion, however, that information contained in certain points needs further clarification and supplementation, and wishes to make the following further comments:

I. Purposes, definitions, equality and non-discrimination, general obligations

1. The Government wishes to underline that since 2021, Greece has its 1st ever National LGBTIQ+ Equality Strategy 2021-2025 highlighting the role of gender stereotypes as a causal factor in the discrimination experienced by LGBTIQ+ persons in multiple fields. The strategy was elaborated by a Committee formed by the Prime Minister, it included academics, members of the civil society and government officials and was adopted following public consultation. The Strategy constitutes a comprehensive plan containing four pillars, following to a large extent the structure of the European Commission's LGBTIQ Equality Strategy 2020-2025. These four pillars are:

- Tackling discrimination against LGBTIQ+ people
- Ensuring LGBTIQ+ people's safety
- A society without barriers for LGBTIQ+ people
- Initiatives for LGBTIQ+ equality around the world

2. Meanwhile, the recommendations of the National Strategy were codified and became part of the annual action plans of the Ministries, monitored by the General Secretariat for Coordination (Presidency of the Government). Here are the most important proposals/actions of the Strategy having been implemented since its adoption, touching upon preventing and combating violence against LGBTI women:

- In 2019, Police Domestic Violence Services were established throughout the country, aiming at coordinating, supervising and guiding Police regional services in addressing cases of GBV more efficiently and effectively. In total, 73 Services were established, one of which within the Hellenic Police Headquarters. Their competences include, inter alia: a) monitoring of domestic violence cases, b) envisaging measures related to preventing and suppressing domestic violence offences, c) elaboration and development of actions with co-competent agencies aiming at the protection of victims, d) collection of data related to domestic violence cases, e) implementation of educational trainings/seminars in collaboration with co-competent bodies and agencies and f) actions for raising public awareness on domestic violence. Moreover, for the first time, in 2022, the Greek police has published a comprehensive guide on how members of the police force should deal with violent incidents targeting LGBTIQ+ individuals. The guide is based on recommendations from the Council of Europe and the National Strategy for LGBTIQ+ Equality.
- Since 2021, the Public Employment Service (DYPA) has included women beneficiaries of the GSEHR's Network of Structures (victims of violence and multiple discrimination), as well as victims of trafficking and transgender individuals, in the vulnerable social groups enjoying special provisions to enhance their vocational rehabilitation (subsidy increase, simplification of the participation criteria concerning their hiring, higher rating of females' application).
- As of 2021, the Ministry of Education has introduced Sexuality Education in national compulsory curricula for primary and secondary education within the so-called "Skills Workshops". Civil Society and LGBTIQ+ organization have contributed to educational material.
- Law 4931/2022 banned "conversion therapies" to vulnerable persons, including minors, a practice aimed at suppressing a person's sexual orientation or gender identity and which the lesbian, gay, bisexual and trans community worldwide,

as well as health experts, have condemned as harmful. The law provision also includes a ban on professionals to advertise or promote such practices.

- Law 4958/2022 prohibits intersex genital mutilation (IGM) procedures and other medical treatments before the age of fifteen. Such interventions can be performed after the age of fifteen and only with the minor's free and informed consent. Greece is actually one of the very few EU countries to ban "conversion" therapies.

- The National School of Public Administration and Local Government, responsible for training programs in public administration has introduced a program related exclusively to LGBTIQ+ issues for employees of the public sector. The training programmes were conducted on a pilot basis in 2022 with a view to gradually be implemented on a larger scale, which is actually the case at the time being.

- The Ministry of Citizen Protection has incorporated LGBTIQ+ dimension in a training program in which approximately 17,000 police officers will participate. The first phase of the program has been concluded with the training of the police officers that will in turn train their colleagues. As of October 2022 the second phase is being implemented.

- In Law N. 4985/2022 revising the Penitentiary Code, gender identity was explicitly added to the reasons why different treatment of prisoners is prohibited and positive measures to address such issues are justified (Article 3). Articles 13 and 14 of the same Code establish the possibility for trans persons to request their transfer to a corresponding penitentiary establishment that is consistent with their gender identity or characteristics. Actually, four trans women convicts were transferred from men to women's prisons in December 2021.

- Law 4589/2019 provides the establishment of Gender Equality Committees (GECs) at all Greek universities. The GECs act as consultative bodies to the university senate, schools and departments. Law 4957/2022 on the operation of higher education institutions upgraded the role of these Committees renaming them into Committees on Gender Equality and Anti-Discrimination. These committees are tasked to promote gender equality and the fight against gender-based, racial, ethnic and religious discrimination, as well as discrimination based on one's beliefs, disability, age or sexual orientation, at all operating levels and in all procedures and activities of academic life. Its responsibilities include providing academics with training on gender equality, LGBTQ+ rights, the fight against all forms of discrimination, addressing sexual harassment and all other forms of harassment, the registration of reports and complaints about incidents of discrimination and sexual harassment or gender-based harassment, as well as the provision of assistance to victims of discrimination, sexual harassment and other forms of harassment when they report discrimination or harassment.

3. In addition, FAROS (Feature a protective environment for LGBTI+ persons) is a very important European initiative/programme aiming to strengthen protection, monitoring and prevention mechanisms as well as combat hate crimes and homophobic, biphobic, transphobic and interphobic discrimination and violence, by enhancing the skills of public servants to better understand and respond to the needs of LGBTI+ people and by developing a network of stakeholders and interested parties which will serve as a safety net for LGBTI+. It was implemented by a consortium of stakeholders: Ministry of Justice, KMOP – Social Action and Innovation Centre, Orlando LGBT+ (Greece), Colour Youth, Rainbow Families Greece (Greece) and Positive Voice (Greece). The cooperation between LGBTI+ organizations, NGOs and public authorities assures an interdisciplinary approach to address the challenge of combating intolerance towards LGBTI+ people. The project's deliverables and additional value will be taken into consideration for the planning of future policies in the field of LGBTI rights and combating LGBTI violence.

4. A final comment worth mentioning is that Greece has achieved a top 15 placement in this year's Rainbow Map & Index, which ranks 49 European countries based on their LGBTI equality laws and policies, according to the ILGA-Europe, the European region of the International Lesbian, Gay, Bisexual, Trans and Intersex Association. Created by ILGA-Europe, the Rainbow Map is considered an essential tool for examining how safe, free, and equal LGBTI people are in comparison to the rest of the population across Europe. More specifically, ILGA-Europe's 2023 Rainbow Map, showed that the country climbed to the 13th position (with its ban on intersex genital mutilation-IGM), up from 17th in 2022, scoring 57%.

5. In Reception and Identification Service facilities (RIS facilities) in Greece, a multitude of information provision activities on issues related to gender-based violence, its prevention and the simultaneous empowerment of women and the awareness are being organized and implemented. The objectives of the actions focused on strengthening knowledge, eliminating stereotypes and minimizing gender discrimination, stigmatization and bullying. These actions have an inclusive character in order to bring the residents in contact with diversity and to inspire in terms of its acceptance. In Facilities there is access to relevant informational material, while through group capacity building activities, animation and empowerment is achieved.

6. Regarding Roma women and population in general, the Government would like to mention that the General Secretariat for Social Solidarity and Fight against Poverty of the Ministry of Social Cohesion and Family is the national body responsible for the coordination and monitoring of Roma social inclusion policies at national level, acting also as the National Contact Point for Roma Inclusion. The General Secretariat is also responsible for the design,, implementation and monitoring of the National Strategy and Action Plan for Roma Social Inclusion (NRIS) 2021-2030, incorporating the principles, priorities and objectives set by the European Strategic Framework and Recommendations for Roma equality, inclusion and participation. With the aim to support Roma equality, inclusion and access to fundamental rights, 60 Roma Branches were established in Community Centers of Municipalities hosting significant rates of Roma. They provide reception, support and interconnection services at local level, as well as individualized support to Roma in all fields of social integration (access to primary healthcare, school enrolment and attendance, renewing of unemployment cards and application for receiving social benefits, such as Minimum Guarantee Income (GMI) and Child Benefit).

7. The empowerment and participation of Roma in social, economic and political life is also very important within the NRIS 2021-2030. The EEA Grants "Roma Inclusion and Empowerment" 2014-2020 Programme includes interventions, like the establishment of a Task Force (consists of 25 experts, including 5 Roma Mediators) in four Regions with large concentrations of Roma (Attica, Central Macedonia, Eastern Macedonia-Thrace and Western Greece) to support their social inclusion and empowerment. Also, three small grant programs related to actions on the (a) empowerment of Roma youth and women, (b) participation of Roma children in children's camps and (c) small-scale local interventions are implemented.

8. In the above-mentioned framework, it should be highlighted that Roma participation has been strengthened, involving the higher level representative body ELLAN PASSE, as well as secondary federations as well as primary Roma bodies (associations, agencies, unions) at local and regional level or collectives that act systematically in the field.

II. Integrated policies and data collection

9. As already mentioned, gender equality issues and preventing and combating all forms of violence against women remains top priority for the newly established Ministry of Cohesion and Family and its General Secretariat for Equality and Human Rights, the competent governmental agency for gender equality in Greece. First of all, it should be made clear that the operation of the National Network of Structures for preventing and combating GBV has been secured. The following projects, many of which were brought up during GREVIO's evaluation visit in Greece, are foreseen for the programming period 2021-2027:

- The provision of interpretation services, in all languages, for the beneficiaries of the network structures.
- The creation of emergency accommodation for abused women. Actions have been taken in order to achieve cooperation with the Hellenic Chamber of Hotels.
- A new Sustainability Study regarding the operation of all the network structures.
- The preparation of a study on technology-facilitated gender-based violence in Greece.
- Awareness campaign for women and girls with disabilities, their families and carers regarding the prevention, recognition and reporting of incidents of gender-based violence
- Seminars for parents/guardians of girls with disabilities on their reproductive and sexual rights
- Training of professionals and public sector executives on all forms of violence against women.

10. The Greek government wishes to clarify that the study evaluating the services provided to perpetrators of domestic violence was not conducted by KETHI, as mentioned in the Report, but it was supervised by the Observatory for Gender Equality of the General Secretariat for Equality and Human Rights and funded by its budget.

11. Regarding Police data, we wish to clarify that the Aliens Division of the Police Headquarters has started as of 1st September 2023 to collect data on the number of requests relating to the renewal of the international protection status on grounds of gender-based violence against women.

12. Regarding Justice, we wish to inform you that the Judicial Statistics Bureau of the Ministry of Justice was established in June 2022 and staffed in July 2022. Despite the short time since its establishment, the Bureau managed to create its own digital platform for collecting judicial statistics, in which, after training all the judicial services of the country, it got a response from 100% of the Greek judicial and prosecutorial authorities. Regarding the Istanbul Convention, the Judicial Statistics Bureau collects data for articles 6 (domestic physical abuse), 7 (domestic unlawful violence and threats), 8 (rape and abuse), 9 (domestic sexual assault) and 10 (obstructing the administration of justice) of law 3500/2006 on preventing domestic violence, the number of criminal prosecutions, by all the Country's prosecutorial authorities, convictions at first instance, acquittals, postponements and how many cases were appealed, as well as the convictions after appeal. At the same time and regarding victims, it collects the number of victims by gender and based on the perpetrator-victim relationship (family member, partner or other relationship).

III. Prevention

13. The Greek Government would like to provide some input on sexual perpetrators' therapeutic programs in the context of the protection of children from sexual abuse and exploitation and the delivery of the first-ever thematic National Action Plan as a cross-sectoral effort to tackle all aspects of related criminality. In this policy context, the country has included in its National Recovery and Resilience Program the establishment of two Day Centers offering support services to minor victims of sexual abuse and/or exploitation. These will be located in Athens and Thessaloniki and their launch is expected by the end of 2023. Within the Centers' operational framework, a therapeutic program for perpetrators will also be offered, in order to directly prevent sexual violence against minors. This provision is widely recognized as of paramount importance for preventing reoffending and, therefore, significantly contributing in reducing incidence of child sexual abuse. In that sense, availability of treatment programs for perpetrators is considered a part and parcel social policy measure of tertiary prevention of child sexual abuse. The therapeutic processes will not, at any stage, be correlated with penal procedures, sentencing or serving. The treatment programs should be tailor-made in the specificities of each perpetrator wishing to be supported in eradicating the danger of offending in the future. Therefore, therapeutic design should not follow a "one size fits all" approach but rather include a variety of tools to be delivered selectively in respect to the specific needs of the individual seeking help. The total duration of the setup and rollout of the perpetrators' therapeutic program is estimated at 18 months, starting in 2024. Its budget will reach 100.000€. Staffing of services is secured by the Ministry of Health. Scientific supervision and coordination will be provided by the Institute of Child Health, Ministry of Health.

14. Within the National Action Plan on Mental Health 2021-2030, adopted in May 2023, under the auspices of the Ministry of Health, our goals for the upcoming period include the following key activities: i. Creating of thirteen (13) mobile support units for children and adolescents to offer psychological and, if needed, psychiatric support to children and adolescents, ii. Reinforcing mental Health Centers for adults with a child-psychiatric team to offer psychological and, if needed, psychiatric support to children and adolescents, iii. Developing and operating promotional programs and raise awareness regarding the mental health of children and adolescents to combat prejudices that exist about mental health issues and prevent the stigma that can be created in cases of young people with mental health problems, iv. Establishing a counseling support center for students in the University of West Attica which has a relatively concentrated campus and a big number of students, to address mental health issues with the intention to implement a program for Mental Health Units in all Universities, v. Developing two (2) day centers for pre-offending adolescents and three (3) guest houses to offer support to adolescents with delinquent behavior.

15. Regarding training of professionals, allow us to present further clarifications from the Ministry of Migration and Asylum. The Reception and Identification Service' (RIS) Directorate of Support, through its Department of Procedures and Training, provides continuous and systematic training, inter alia, on the identification and case management of GBV. These trainings are addressed not only to the RIS staff but also to staff operating within the accommodation facilities. In this context, RIS is cooperating with International Organizations such as the United Nations High Commissioner for Refugees (UNHCR), the International Organization of Migration (IOM) and Non-Governmental Organizations. In particular, the UNHCR trained the security staff deployed in the Closed Controlled Access Centres (CCACs) in the islands on GBV and Prevention from Sexual Exploitation and Abuse.

16. Here are data on the trainings of personnel in the field on vulnerabilities, GBV and trafficking in human beings:

- The total number of RIS personnel in the field is: 704. Out of this number, 95% of the personnel has attended the introductory training of the European Union Agency for Asylum which includes information on vulnerabilities and GBV.
- All RIS staff (100%) in the field that is assigned to support vulnerable persons, including GBV survivors, have attended the training on the Reception of Vulnerable Persons (RVP-A) of the European Union Agency for Asylum.
- Moreover, a total of 339 persons have attended the training on Identifying and Addressing Racist Violence. More specifically, 170 persons were RIS staff, while the rest 169 persons were Police Officers, security staff, members of NGOs and staff of the National Public Health Organization, all deployed in the reception and accommodation facilities across Greece. The trainings were co-organized by the Department of Procedures and Training of the Directorate of Support of the Ministry of Migration and Asylum, the Ministry of Citizen Protection and the Racist Violence Recording Network.
- A total of 225 persons operating in the reception and accommodation facilities across Greece have attended the training on Trafficking in Human Beings -“Amelie Project”. To be noted that out of the 225 persons, 120 persons were RIS staff, reaching the 8,5% of the total number of RIS staff.
- Training on: “Online Trafficking in Human Beings as an emerging phenomenon: Supporting a context for the protection and support of potential victims of Trafficking of Human Beings”, which was facilitated by the Danish Refugee Council in the context of the “ Free2link ” project.
- In addition, 95 RIS staff operating in the field, participated in the presentation of the GBV pocket guide, an online application on how to respond to a disclosure of a GBV incident, which was created by the General Secretariat for Demography and Family Policy and Gender Equality in cooperation with UNICEF.
- In the context of HARP project (Harmonizing Protection Practices in Greece), the Department of Procedures and Training of RIS in cooperation with the International Organization of Migration conducted two separate two-day Training of Trainers on Gender Based Violence, where 17 and 16 Focal Persons on vulnerabilities, including GBV, from the field and the HQ of the Ministry of Migration and Asylum, participated respectively.

17. On a general note, the training series provided by the European Union Agency for Asylum are consisted by an on-line module, which is followed by a Face-to-Face training. Depending on the tasks assigned in the field, each staff member participates in a variety of trainings, such as Reception of Vulnerable Persons, Block A and Block B, Trafficking in Human Beings etc.

18. All trainings which are implemented by RIS in collaboration with the European Union Agency for Asylum are evaluated by the participants and future trainings are adapted accordingly, based on the feedback we receive. Based on the evaluations received from the participants, covering the trainings that were implemented in 2022 the satisfaction rate was 96%, while for the first semester of 2023 the relevant rate was 95%.

19. In the field of violence and harassment at work, the Greek Government would like to further elaborate on the relevant actions in the private and public sector. According to Law 4808/2021 that introduces significant reforms in the labor relations and ratifies the ILO 190 Violence and Harassment Convention, workers and employers, both of the private and of the public sector,

irrespective of their contractual status, including workers bound by a works contract, offering independent services, employed on salaried assignment basis, through third party service providers as well as persons in training, including interns and apprentices, volunteers, workers whose employment relationship has been ended, jobseekers and workers in informal economy, are defined as affected persons.

20. More specifically, as regards measures to prevent and address violence and harassment in the public sector, article 22 para. 4 of the law provides for the issuance of a ministerial decision (actually issued in January 2023). The ministerial decision repeats the definitions of Law 4808/2021 on the purpose, key meanings and places where violence and harassment may occur, measures to inform and prevent, protect and prohibit retaliation, while article 5 regulates the special process and the competent bodies for submission and examination of relevant complaints about incidents of violence and harassment (a. the Ombudsman also for issues within its remit for incidents with violation of the principle of equal treatment pursuant to Law 3896/2010 and 4443/2016, b. within the institution where work is provided, the Integrity Consultant, otherwise the higher in administrative hierarchy head of the institution in charge of staff matters and especially for Local Self-Government Agencies of 1st and 2nd Degree also the Secretary of the relevant Decentralized Administration and c. the National Transparency Authority).

21. In order to monitor the development of disciplinary cases, including misconduct related to harassment at work or violation of equal treatment, it is noted that the National Transparency Authority has developed an electronic tool ‘E-peitharxika’ for monitoring disciplinary proceedings in cooperation with the Secretariat-General for Human Resources of the Ministry of the Interior.

22. Also, the above-mentioned ministerial decision renders the Integrity Advisors competent to receive reports of violence and harassment at work. The institution of the Integrity Advisors in the public sector was introduced with Law 4795/2021 with the task ensure a consistent framework for effective protection of employees who identify, suffer the consequences or wish to report breaches of integrity, as well as to provide support, information and advice to the employees on issues of morality and integrity in their workplace. The provisions of the Law already provide for the establishment of an Integrity Advisor Independent Office in each Ministry, with the exception of three Ministries, and the possibility of setting up the Office in also in other public entities.

23. On the other hand, in the private sector, the Government wished to specify the extended competence of the Labour Inspectorate as regards incidents of violence and harassment at the world of work, to provide the affected persons with increased safeguards and ensure that all parties responsible shall fulfill their obligations in accordance with the law. Thus, the Labour Inspectorate is responsible to monitor also at preventive level that the employers shall fulfill their above-mentioned obligations, irrespective of whether a relevant application is filed or not. The Labour Inspectorate is organizationally supported by the establishment of an Independent Department for the monitoring of phenomena of violence and harassment at work, monitors the progress of complaints and applications for labour dispute resolution relating to violence and harassment submitted to the Authority to ensure that they are dealt with promptly and efficiently.

24. In accordance with the above, for the second semester of 2021, which was the first operation semester of the Independent Department, the first Annual Report for the year 2021 was prepared in March 2022 and was communicated to the competent services. Additionally, in March 2023, the second Annual Report for the year 2022 was issued and communicated accordingly.

25. Based on the collection, processing and use of the relevant quantitative data for the year 2021, the following qualitative conclusions emerged and the Greek government would like to share:

a. The vast majority of labour disputes concerned incidents of violence, verbal, physical, psychological and general harassment under the new concepts and competences introduced by Articles 4, 17 and 18 of Law 4808/2021 and at a rate of 86,6% compared to 13,4% of the corresponding cases of sexual harassment, which were already covered by the pre-existing legislative framework of Laws 3896/2010 and 4443/2016.

b. It is noteworthy that 33% of the complainants- “victims” were men, while women took the first place with 67%. This reflects in practice the statutory disconnection of the prohibition of harassment and violence at work (mobbing) from the concept of prohibited criteria of discrimination or unequal treatment (in relation to gender or sexual harassment under Law 3896/2010 or other criteria of discrimination, such as ethnic origin, religion, age, disability, etc. under Law 4443/2016).

c. A defendant as the person who violates the prohibition of violence and harassment by causing relevant incidents that are either related to work or arise from it, was identified at a percentage of 65% as the employer himself/ herself or a person exercising managerial authority or representing the employer, whereas it appears at 35% of the cases that the relevant violation was caused by another employee or a person under another employment relationship within the meaning of Article 3 of Law 4808/2021 in accordance with the relevant provisions of Article 12 paragraph 2 and Article 19(2) and Article 19(2) of Law 4808/2021.

26. Finally, it is worth noting that fifty-one (51) cases out of a total of one hundred and fifty-one (151) have been resolved by the enterprise taking the appropriate measures in accordance with Law 4808/2021, relevant recommendations to the enterprise for a world of work free of violence and harassment and relevant monitoring by the competent Departments of Labour Relations Inspection, that is, at a percentage of 34%. This increased rate of out-of-court resolution of these particularly controversial and difficult-to-prove cases reflects the particular concern and interest shown by the competent Head of Directorates or Departments of the Labour Relations Inspectorate, who, when dealing with the relevant cases, make use of the entire protective legislative and regulatory framework in force. Hence, the denounced incidents of violence and harassment at work are effectively dealt with during this crucial extrajudicial stage for the benefit of all parties involved, employees and employers, but above all for the consolidation of industrial peace and the emergence of the most important mindset for preventing and avoiding forms of violence and harassment.

IV. Protection and support

27. On 5th November 2023, the Horizontal Risk Assessment Tool for women victims of GBV and domestic violence was delivered to the General Secretariat for Equality and Human Rights following the period of its evaluation and after having embedded the comments and remarks from the pilot phase. For the time being a plan of how the processes required to incorporate the tool to the public administration services is under development. By the end of the year 2023 it is estimated that the afore-mentioned plan will be completed.

28. The “Panic Button” application was launched in November 2022, allowing a woman in danger to call for help by pressing a button on her mobile phone so that the police can locate and help them. It was the result of a collaboration between the General Secretariat, the Ministry of Citizen Protection, the Ministry of Digital Governance and Vodafone Greece. The application is available to women referring to counselling centers and police stations in Athens and Thessaloniki for now.

29. Under the co-operation of the General Secretariat and UNICEF Greece, the digital application “GBV Pocket Guide” has been adapted and translated into Greek, aiming at providing support and information on all professionals or people that might come across a GBV case. The “Pocket Guide” is designed to provide all humanitarian practitioners with concrete information on supporting survivors of GBV in contexts where there is no GBV actors available. The resource package uses global standards on providing basic support and information to survivors of GBV without doing further harm.

30. The General Secretariat for Equality and Human Rights, in collaboration with National School of Public Administration is planning to develop 2 new training seminars for civil servants with focus on: 1) Training of the frontliners who provide services to victims/survivors and perpetrators of domestic and GBV violence to the requirements and provisions of the Istanbul Convention, 2) Training on intersectionality. Additionally, it is planned the update of the content of the training material of the personnel working in the network of structures against GBV of the General Secretariat for Equality and Human Rights. All these initiatives are under discussion. Last but not least the training material regarding the intersection of disability in the provided services in the public administration has been finalized. The General Secretariat for Equality and Human Rights contribution focused on the intersection of disability and gender in the health care structures of disabled people and on refugee camps. The material employed was stemmed from the two publications of the General Secretariat for Equality and Human Rights, namely: “Guide on Ethical and Professional Behaviour for Employees in social-care structures for women and girls with disabilities who are victims of GBV” “Handbook for GBV practitioners working with disabled women and girls at refugee camps and asylum services”.

31. Furthermore, on the aspect of intersectionality between gender and disability, the onset of an Informational Campaign on recognizing incidents of GBV on health care and supportive to disabled persons structures is planned, in collaboration with National Confederation of Persons with Disabilities. The target groups of this campaign are disabled women and girls, their parents/ guardians and carers. The period of implementation is 01/10/2023 - 31/12/2024. Within the same period of time trainings on sexual and reproductive rights of disabled women and girls to with target groups their parents and guardians are planned, in collaboration with National Confederation of Persons with Disabilities and KETHI.

32. The 4th Annual Report on violence against women will be finalized and published by the end of November 2023. The focus topic for this year is GBV cyberviolence.

33. Training seminars on GBV on refugee women with collaboration between the General Secretariat for Equality and Human Rights and the UNHCR is on-going. Two more training sessions have been planned until the end of 2023, and new ones will be organized for the following year. Within this cooperation, the GBV working group with the participation of civil society organizations is an on-going monthly initiative.

34. The Ministry of Migration and Asylum has contracted the Non-Governmental Organization "METAdrasi", to provide interpretation services to third country nationals who reside in Registration and Accommodation facilities across Greece. This project is in place since June 2023, and it is foreseen to be implemented until June 2027.

35. Controlled access facilities of temporary accommodation of asylum applicants inform the third – country nationals of the services provided by the Counseling Centers of the Network of Structures of the General Secretariat for Equality and Human Rights and maintain close cooperation with the above-mentioned centers, where they exist. Within the operation of the facilities referrals of cases of abused women are taking place to the appropriate actors, while information sessions on gender-based violence are carried out on a regular basis. Referrals are also taking place, whenever deemed necessary, to shelters for abused women following established cooperation.

36. Within the Facilities operate (or in some Facilities had operated in the past) women friendly spaces. These spaces offer a safe space where women could express themselves, engage in creative activities and get informed. These spaces have operated either from RIS personnel or in cooperation with civil society organizations. Within these spaces, prevention, information and psychosocial support actions on gender-based violence and abuse are accommodated and implemented, with the key objectives of supporting and empowering women, through creative activities and provision of information on their rights.

V. Substantive law

37. The Greek Government would like to point out the crucial role of the Ministry of Justice in undertaking the obligation to harmonize the existing legislation with the provisions of the Istanbul convention. At the same time, the Ministry is responsible for the training of the judiciary by holding special seminars at the National School of Judges.

38. The National School of Judges provides continuous training in matters concerning the Istanbul Convention. Although the program for the year 2024 is not yet published, a special seminar on the recent family law (Law 4800/2021) and its penal and civil law dimensions regarding domestic violence will take place in November 2023.

39. Regarding the legislation, an attempt was made to amend the Penal Code in the year 2019. The legislator tried to cover the Istanbul Convention issues with an explicit provision in the law and with a separate criminal sanction for each case. The basic forms of committing the act of rape (Article 336 of the Penal Code), such as the "exercise of physical violence" and the "threat of serious danger or psychological blackmail" which include the concept of coercion and which in most cases are manifested in the outside world and leave evidence. That is why the punishment is more severe and starts from 10 years + 1 day imprisonment to up to 15 years. The performance of a sexual act "without consent" covers the cases where the act of impurity was performed against the will of the victim, which was externalized to the perpetrator but was not accompanied by resistance, or when the victim initially seemed to agree to participate in the sexual act but subsequently withdrew and clearly expressed his opposition, or the rape of prostitutes.

40. The absence of consent before the amendment of the Penal Code was a matter of interpretation and "correct" submission of the facts to the rule of law which did not foresee it as a case of rape, but which was influenced by the social perceptions as well as the views on the moral behavior of each judge. So the fact that the lack of volition of the victim is now explicitly provided for in the law, makes it easier for any sexual act that is not the result of a conscious decision and desire of the participating adults to be characterized as rape and to be punished accordingly.

41. Furthermore, there are legislative provisions regarding the exclusion of consent in cases of the victim's lack of legal capacity (Articles 338-339). Other non-consensual acts of a sexual nature (e.g. touching genitals, forced nudity, etc.) are also to be prosecuted, under Article 337 of the Penal Code. It should be noted that until now there have not been many convictions for rape by the Greek courts. However, in the last two years in Greece this trend seems to be changing and that the victims are no longer in the mood to cover up the perpetrators that they had in the past. This has been reflected in judicial practice by the number and nature of the cases (in the field of art, sports, structures for the protection of minors - in schools, etc.) that are reported and end up going to trial without the victims withdrawing, with evidence and witness statements and lead to the final conviction of the perpetrators.

42. In addition, Greece was one of the first countries to incorporate Convention 190 of the International Labor Organization by the law 4808/2021. This law established obligations on employers to employees concerning violence and harassment at the workplace. Among other issues that were included to law, the Government introduced the mandatory development of policies to combat violence and harassment and introduced strict administrative sanctions with the imposition of fines by the Labor Inspectorate, responsible for monitoring violence and harassment at the workplace. Furthermore, it made provision of immediate protection of those

affected by the provision of removal from work of one of the two parties by submitting the complaint, by banning reprisals and by reversing the burden of proof. With this effort, a coherent and modern framework has been put in place to prevent and treat the case of violence and harassment in public sector, thereby contributing to the creation of a working environment that respects and promotes the right of every person in a world of work without violence and harassment.

43. The Government would also like to stress that the existing domestic violence legislation is under amendment and modernization, in order to be in line with Istanbul Convention. It will pass as an Act in the Parliament by the end of November 2023. An attempt is made to adapt the law to contemporary social conditions and to the need to protect the family, minors and victims of domestic violence, especially women. It was also proven necessary to provide victims with financial and psychological support measures and to create a stricter procedural framework (restraining orders etc) so that the perpetrator does not relapse and the victim is efficiently protected. In fact, we wish to particularly mention that, according to the draft bill and in accordance with article 51 of the Istanbul Convention, the obligation of individual risk assessment and management for victims of domestic violence is provided for the 1st time in Greece. Particular characteristics and needs of each case are also taken into account, after hearing of the victim. The obligation of cooperation between all services in order to determine the particular measures to help and protect the victim is also taken into account.

VI. Investigation, prosecution, procedural law and protective measures

44. Regarding investigation, prosecution, procedural law and protective measures, the Greek Government would like to inform you that a Supreme Court Prosecutor Circular (No. 7/23-05-2022) on the recognition of individuals as trafficking victims has been issued. The circular applied the Council of Europe Convention on Action against Trafficking in Human Beings, by offering clear and specific instructions for all prosecutors in Greece in relation to the protection of victim's rights.

45. Moreover, we wish to point out that EKKA (National Center for Social Solidarity) has a well-established framework with regard to the counselling programme (Penal Mediation) consisting of the following:

1. Programme Operating Procedure
2. Application of admission in the Programme
3. Cooperation Agreement signed by the beneficiary
4. Certificate of completion or termination of cooperation to the referring Prosecution Authority
5. Reporting on the non-appearance or non-eligibility for the programme to the referring Prosecutor's Authority
6. Psychosocial History of Violence (for use only by EKKA psychologists, with the aim of collecting data for clinical and research purposes)
7. Conflict management recording scale (for use by EKKA psychologists, as an indicative evaluation/feedback tool)

The main objectives of EKKA's programme are:

- Changing the perpetrator's behavior in relation to domestic violence/abuse (addressing/eliminating the phenomenon) and ensuring safety for the victim.
- Changing perceptions about power and control
- Anger management or other interpersonal problems
- The development of social/communication skills
- Introducing a gender perspective in partnerships
- The prevention of future violent behavior

The protection of victims is an ongoing process through a risk assessment and accompanies the entire mediation process.

46. In recent years EKKA has started an initiative both in Attica and Thessaloniki for the development of a network with Organizations and Agencies that implement similar programmes, providing guidance and supervision to other practitioners across different regions (e.g., Northern Greece, the Peloponnese, Ionian islands etc.).

The last three-years data indicate that almost half of the referred perpetrators admitted to EKKA have completed the programme.

VII. Migration and asylum

47. With regard to the protection of vulnerable persons and particularly of victims of violence, abuse and exploitation, we would like to present the following additional information:

The General Secretariat for Vulnerable Persons and Institutional Protection (GSVPIP) was established on 27 June 2023 with Presidential Decree 77/2023. GSVPIP supersedes the Special Secretariat for the Protection of Unaccompanied Minors (SSPUAM), taking over its competencies. In its three years of service, since 2020, SSPUAM played a crucial role to the creation of a comprehensive and effective protection framework for unaccompanied minors in Greece, by designing, developing and implementing innovative child-protection policies and initiatives, that are based on effective coordination and close collaboration between the competent authorities and the synergy between state actors and the civil society. The GSVPIP was established with the mandate to build upon the best practices that have emerged through SSPUAM's operation and apply them in a wider framework for addressing more effectively the challenges that vulnerable persons are facing, strengthening Greece's compliance with the EU asylum acquis. The GSVPIP will establish a comprehensive framework for the protection of vulnerable persons by designing and implementing a national strategy, establishing specific referral pathways, standardized procedures and tools, and focusing on capacity building. Moreover, it will implement specific programmes for vulnerable persons with special reception needs. The General Secretariat will support the competent authorities, such as the Reception and Identification Service and the Asylum Service on matters of vulnerability, and will promote the interconnectedness of agencies, especially within different Ministries, improving the access of vulnerable persons to services. Victims of violence, abuse or exploitation third country nationals or stateless persons shall be the primary target group for the GSVPIP interventions. Up to now, the services and units have not been established, as this is a time-consuming process. The General Secretariat for Vulnerable Persons and Institutional Protection has as its strategic objectives the planning, implementation, and supervision of strategies, policies, procedures, and actions for the protection of vulnerable persons, third-country nationals, or stateless persons in Greece.

48. Unaccompanied minors arriving at the designated entry points are placed in the Closed Controlled Access Centres in the islands or the Reception and Identification Centre of Fylakio. There they remain for a limited time until all reception and identification procedures have been completed and they are transferred to accommodation facilities for UAMs. A psychosocial assessment takes place during the stage of first reception procedures; if they are separated from their families but accompanied by a relative or other family-like person, their link is further assessed to examine whether their temporary care will be assigned to the adult person. For as long as unaccompanied children reside in the CCACs, they remain in the so-called safe areas, which are separate areas for the reception of UAMs. Safe areas are operated by (child protection) NGO Staff or International Organization for Migration and cofunded with European and national resources.

49. Unaccompanied minors identified in the mainland without having been subjected to the identification and reception procedures of the Reception and Identification Service of the Ministry of Migration and Asylum are referred to the National Emergency Response Mechanism of the Ministry of Asylum and Migration (General Secretariat for Vulnerable Persons and Institutional Protection) and are placed in emergency accommodation facilities for UAMs. There their best interest is assessed and further referral to long-term accommodation facilities takes place. Emergency accommodation facilities are funded by other states and national resources and are operated by IOM.

50. After the first reception procedures or the emergency accommodation is completed, unaccompanied minors are referred to the General Secretariat for Vulnerable Persons and Institutional Protection, to place them in long-term accommodation facilities, according to their needs and age. Accommodation facilities comprise of: a) accommodation centres with a capacity of 14 to 40 places each, and b) supervised apartments for semi-independent living (SIL) with a capacity of 4 places each.

51. Accommodation centres are primarily for 0-12 years old children, or for girls of all ages, or for boys and girls separately from 12 to 18 years old. Very young ages stay there when they are the children of underage mothers (together with their mothers). The SIL apartments are for minors from 16 years old and above (girls separately from boys).

52. All accommodation facilities are funded by European and national resources, are operated by child protection NGOs (apart from 2 out of the 64 centres and the 63 SIL apartments). The services provided are foreseen in the legal framework and funded and these include: housing, nutrition, education support, psychosocial support, legal aid, primary healthcare, interpretation, recreational activities.

53. The Ministry of Migration and Asylum has developed a National Strategy regarding the protection of unaccompanied minors, which is based on four pillars of action: a) enhancing reception capacity and protection of rights; b) identifying and implementing durable solutions; c) ensuring protection from violence and exploitation; and d) improving data collection on minors and the accommodation system. In accordance with the National strategy, a new law on guardianship has been adopted by the Hellenic Parliament in June 2022 (law 4960/2022 amending law 4939/2022). Under the new legal framework, the state maintains a guiding and supervising role, qualified legal entities are appointed as guardians, and the public prosecutors holds an independent role for the appointment of guardians. The law defines procedures and sets standards for guardianship of unaccompanied minors and the work of professionals on the ground. Further, the law defines the rules or procedures for the accommodation of UAMs, the emergency support, the transfer and accompaniment of UAMs and the database for UAMs and accommodation facilities as well. According to the law, public or private law legal entities or international organisations involved in the protection of unaccompanied minors that may provide guardianship or accommodation services adhere to a Child Protection Policy and a Code of Conduct, must regularly train their staff on several issues, including protection from violence, abuse and exploitation (in terms of early identification, prevention and intervention). The General Secretariat for Vulnerable Persons and Institutional Protection is currently developing a Code of Conduct for all professionals working with and for UAMs, as well as Standard Operating Procedures for handling a suspected or confirmed (disclosed) case of abuse of an unaccompanied minor. Moreover, as provided by law, the Ministry of Migration and Asylum together with the Ministry of Social Cohesion and Family shall develop a Child Protection Policy for all actors to follow. With regard to the training of professionals, the guardianship mandated persons and their coordinators are scheduled to be trained by EU Fundamentals Rights Agency (FRA), EU Asylum Agency (EUAA), United Nations High Commissioner for Refugees (UNHCR) and the Ministry of Migration and Asylum (General Secretariat for Vulnerable Persons and more agencies for relevant topics); professionals in accommodation facilities for UAMs are currently trained by the National Kapodistrian University of Athens.

54. Moreover, given that mental health is another priority of the National Strategy, the General Secretariat for Vulnerable Persons and Institutional Protection of MoMA has developed together with the academia, mental health professionals and the Greek SOS Villages a pilot project called “Mental Health Hub” for supporting professionals working in the

accommodation facilities for minors, providing clinical supervisions, and counseling to them when necessary (guiding them on case management) and preventing their burnout. In parallel, under the same project, professionals are trained in mental health issues of UAMs and crisis management during children's stay in the accommodation facility. At the third level, mental health professionals provide specialized psychological support to minors upon request. Furthermore, in line with the National strategy, the UNHCR has developed a project with NGO "Praksis" for the holistic support of girls who have been victims of violence. The project takes place in Athens and Thessaloniki and primarily focus on enhancing resilience and treating the trauma, through specialized psychological support. At the same time, social and legal support is also provided.

55. The General Secretariat for Vulnerable Persons and Institutional Protection of MoMA together with UNHCR and EUAA are implementing a project aiming at the establishment of a National Best Interest Procedures System in Greece with the purpose of creating harmonized tools, training and certifying child protection professionals in applying BIPs, when necessary. The initial target groups are professionals engaged in the fields of accommodation, protection service provision and guardianship of UAMs. Under this framework, tools, guidelines, supporting material, and training material have been developed and are currently piloted. Trainings of professionals will take place during the following months. An accreditation system is also in process with the support of the West Attica University. The goal of the BIP accreditation system is the establishment and mainstreaming of harmonized Best Interests Procedures in Greece, undertaken only by certified practitioners. The establishment of a National BIP Accreditation system and clear case management system by the General Secretariat for Vulnerable Persons and Institutional Protection will eventually contribute as a best practice to the adoption of a harmonized national child protection case management system for all children in Greece by the competent authorities.

56. A central priority of the GSVPIP, has been, since its establishment as a Special Secretariat for the Protection of Unaccompanied Minors in 2020, to offer effective protection to the most vulnerable of unaccompanied minors, i.e. those who are homeless or in precarious living conditions, such as children temporarily accommodated by unrelated adults, living in squats or in makeshift constructions. These children are in grave risk of falling victim to trafficking networks and being subject to abuse, violence, or exploitation and are often trapped in forced labour, criminality, or sexual work. As a result, in 2021 the National Emergency Response Mechanism (NERM) was established with the support of UNHCR. NERM proactively traces and identifies unaccompanied children in need or at risk, including child victims of trafficking, and ensures immediate intervention and protection.

57. To reach its target population, NERM has put in place a procedure, which relies upon the close cooperation between the State, International Organisations (namely IOM and UNHCR) and civil society organisations. The Mechanism is comprised by three main components: the Tracing Telephone Line, operated centrally at SSPUAM; the mobile units, operated by the NGO Arsis in Thessaloniki and the Network for Children's Rights (NCR) in Athens, which conduct street-work activities in order to proactively trace homeless UAM; and the emergency accommodation facilities, with a total capacity of up to 200 places, which are operated by IOM. NERM is currently operating with funds from EEA Grants, Swiss and National resources.

58. Upon tracing of an unaccompanied child in need, or a referral to the telephone line, NERM secures its immediate transfer to emergency accommodation facilities, following their registration in the Eurodac system at designated police departments. In these facilities, the children are provided with psychosocial and legal support, and they are connected with the asylum procedure. Following a short stay and a best interest assessment, they are subsequently

placed in long-term accommodation. Since its inauguration on 5 April 2021 and until September 2023, the Mechanism has managed to accommodate more than 3,500 homeless UAMs. Moreover, as a response to the ongoing Ukrainian refugee emergency and keeping in mind that separated or unaccompanied children from Ukraine are at high risk of human trafficking, NERM has put in place comprehensive procedures for the immediate identification, registration, and best-interest assessment of separated and unaccompanied minors arriving in Greece from Ukraine. Following identification and registration of UAM arriving from Ukraine, NERM provides emergency accommodation to unaccompanied minors and follows-up the cases of separated minors, who are accommodated in Greece by relatives.

During its 2 years of operation, NERM has achieved to establish a highly effective, reception system, for vulnerable unaccompanied minors who are traced to be homeless or living in precarious conditions. Based on these tangible results, the NERM is about to expand its operations addressing the needs of vulnerable adult population (third country nationals or stateless persons) too. The aim is to identify vulnerable persons in precarious living conditions and provide them with immediate support and refer and connect with the most appropriate services and agencies.

59. The Ministry of Migration and Asylum is designing a new accommodation scheme for vulnerable groups, with a capacity of 500 places in apartments in cities (project “STIRIXIS”). After assessing the needs and identifying vulnerabilities of asylum seekers, these shall be referred to the General Secretariat for Vulnerable Persons and Institutional Protection to place them in apartments. Social workers will be assigned with the monitoring of the cases of the persons accommodated there and a Unit of the GSVPIP will guide and connect the persons with the necessary agencies and services. Effort will be put for several places to be available for immediate accommodation of homeless or at-risk persons from the streets, regardless of their legal status. The project shall be funded by EU and national resources.

60. The Greek Government would like to clarify that in cases of abusive spouses or partners, who have been convicted by a final judgment for an offence relating to domestic violence and have requested the renewal of their international protection status from the Aliens Division of the Hellenic Police Headquarters, their renewal requests may be refused. In addition to that, in case of abusive spouses or partners, who have been convicted by a final judgment for an offence relating to domestic violence and have already been granted this status from the above-mentioned Authority and is valid, their status may be re-examined. However, in such cases, the international protection status of the spouses or partners, who are domestic violence victims, is not affected, an autonomous residence permit is granted and their rights are protected.

61. The JMD no. 734214/06.12.2022 on Safe Third Country national list is based on ref. no. 711998/2022/28.11.2022 "*Proposal on the Safe Third Country National List according to art. 91 L. 4939/2022*" of the Director of the Asylum Service, as explicitly mentioned in the preamble of the JMD.

It should be signified that all the former JMD mention explicitly in their preamble the relevant proposal of the Director of the Asylum Service, according to art. 91 L. 4939/2022.

62. The Greek Government would like to clarify that in Par.332, the comment and the conclusion is considered too general. It should be further specified in order the Greek Asylum Service to be able to provide a specific answer. The interrelation between understaffed working teams and the impact on the quality of the asylum procedure is not clear.

63. The Greek Asylum Service collaborates with national and european stakeholders on the provision of interpretation. The collaboration takes place under specific framework which includes at least the minimum standards in accordance with the european guiding principles.

64. The Greek Asylum Service secures the provision of adequate support to personnel dealing with the examination of international protection applications, through the conduct of trainings, quality feedback reports, focusing on different thematics, including gender-based violence section. The Greek Asylum Service has assigned focal points to each Regional Asylum Office/Asylum Unit to ensure the quality of international protection procedure. Also, the Greek Asylum Service is supported by EUAA experts through the embedded and non-embedded model based on the signed Operating Plan 2022-2024.

65. During the examination of the requests for the renewal of the international protection status, the Aliens Division of the Hellenic Police Headquarters is seriously taking into account whether the applicant is a domestic violence victim, as this fact can be decisive for the approval of such requests. In addition to that, the aforementioned Division always gives priority to the examination of requests made by victims of gender-based violence, without subjecting them to procedures that may expose them to further violence and re-traumatisation. Furthermore, the Aliens Division ensures and encourages the cooperation with professionals, such as attorneys, in order to assist and expedite all the necessary procedures during the examination of such requests. Last but not least, it is important to note that all the requests for the renewal of the international protection status and the issuance of the relevant residence permits deriving from this status, which belong to the competence of the Aliens Division, are free of charge.

66. In the Reception and Identification Centers (RICs) and the Closed Controlled Facilities (CCACs), apart from the areas for unaccompanied minors, there are specially designed accommodation areas for single-parent families, while in the CCACs there are additional accommodation spaces exclusively designed in each Zone that are accessible for people with disabilities.

67. In the Controlled Temporary Accommodation Facilities for Asylum Seekers (CTAFAS) there are distinct accommodation compartments for vulnerable groups and single women. In all structures, in accordance with RIS General Regulation of Operation, the allocation takes into consideration special reception needs/vulnerabilities with particular attention on ensuring safe space for single women and separate housing based on gender.

68. In addition, in June 2022, the 323000/06.06.2022 RIS Circular was issued concerning the appropriate procedure - within the Temporary Accommodation Facilities - according to which the accommodation of both adults and minors takes into account, among other factors, gender, protection issues and vulnerability criteria.

69. At the same time, arrivals and organized population transfers from other structures and Centers are carried out taking into account the cultural characteristics of the population, the spoken language, the country of origin, the composition of the family, gender, protection issues, any vulnerability criteria, etc. At the same time, it is ensured that the places to be installed (houses/dormitories/beds) are clean, suitable for accommodation and that the necessary equipment is available.

70. Since May 2023, the Controlled Temporary Accommodation Facility for Asylum Seekers in Pyrgos has been reactivated through funding from the European Economic Area in order to meet the special reception needs of vulnerable population groups. The main target group are single-parent families consisting of mothers and minor children, women who have recently given birth to a child and women survivors of gender-based violence. The framework of services provided includes specialized services such as: Legal Support and information,

Medical services, Psychosocial services / counseling, Education and Recreational activities. The capacity of the facility is set at 200 places.

71. In addition, significant technical interventions have been made in all facilities that have contributed to reducing the risks of occurrence of incidents of gender-based violence. Indicatively, some of these interventions concerned: the use of containers or accommodation units instead of tents, the increase of lighting inside and outside the Structures, the creation of separate areas for the possibility of accommodation for single women and single-parent families and / or other vulnerable people, the availability of private toilets inside the accommodation units and the prioritization of vulnerable people, the provision of keys to the residents, 24/7 security service etc.

72. Regarding the recognition of vulnerability the Greek Government would like to clarify that the law recognizes a number of vulnerabilities that require special reception conditions. In particular, as per article 1 of the law 4939/2022, it is stipulated that minors (unaccompanied or not), shipwreck victims' direct relatives (spouse, children and siblings), people with disabilities, the elderly, pregnant women, single families with a minor child, victims of human trafficking, persons with serious illnesses, persons with mental disabilities and victims of torture, rape or other forms of psychological, physical or sexual violence (including victims of genital mutilation) are deemed to be vulnerable.

73. The Reception and Identification Services will cover the immediate needs of the above-mentioned vulnerable individuals and will cater for them throughout the reception and identification procedure.

74. Upon arrival, people who evidently belong to vulnerable groups are given priority to triage procedures in order to assess and address any medical needs. The purpose is to separate emergency cases from non-urgent cases, so that they are referred to the competent health treatment units at the appropriate time. According to article 41 of the Law 4939/2022, the third stage of the reception and identification process includes the registration and medical check-up and the provision of any necessary care and psychosocial support. More specifically, the medical check-up includes:

(c) their medical check-up and the provision of any necessary care and psychosocial support;

(d) caring for those belonging to vulnerable groups in order to provide them with specialised care and protection.

75. Medical examination and psychosocial assessment are carried out by a doctor, psychologist or social worker, in the presence of an interpreter of the same sex as the examinee, if possible, in confidentiality and with each individual, without the presence of relatives or other persons. The medical check-up and psychosocial assessment is carried out with respect for human dignity, in accordance with the principle of confidentiality and is necessarily accompanied by appropriate information to those subjected to it. In addition to the initial psychosocial assessment, psychosocial support can also be provided any time throughout the stay of asylum seekers at the Center.

76. Moreover, since October 2022, Reception and Identification Service has implemented the "Case Management program" with the assistance of EUAA, which aims to provide services (identification, prioritization, referral and monitoring of special reception needs and vulnerabilities) to all residents accommodated at Reception Centers and Facilities regardless of their legal status. In particular, the above programme prioritizes vulnerable groups in order to ensure that their particular reception needs are being met. Support is provided both at the arrival

stage and throughout their accommodation in the center/facility. Main responsibilities of employees under the above mentioned program include:

1. Identification of cases of vulnerability and/or special reception needs, provision of necessary information on a case-by-case basis, referrals to other bodies, Authorities and services, according to the needs and wishes of the individual and upon provision of informed consent (unless otherwise specified by law such as in cases of child abuse).
2. Coordinate actions and/or services provided, in cooperation with other bodies and/or services such as the competent Public Prosecutor's Offices, the National Public Health Organization, the Special Secretariat for the Protection of Unaccompanied Minors.
3. Undertake the mapping of actors and services related to vulnerability and protection issues.
5. Support shelter allocation in appropriate accommodation taking into account special reception needs or vulnerabilities
6. Provide information to residents on protection issues, such as gender-based violence and child protection, organize info provision and educational activities, distribute information material and others.

At Central level, focal points have been assigned from the three Directorates of RIS with main responsibility to support Reception Centers and Facilities in the above mentioned tasks.

77. Regarding referral pathways, the Greek Government would like to inform GREVIO that according to RIS Circular 80433/8.2.23, a specific role profile is defined in order to support Regional Centers/Facilities on issues related to Gender – based violence – trafficking in human beings – victims of torture. Main responsibilities of the mentioned above reference person are:

1. Mapping of relevant bodies and services
2. Update of Referral pathways
3. Guidance to Case Managers for communicating and carrying out administrative procedures related to the target group
4. Support and monitor of the operation of the Help Desk
5. Assistance in designing and activating feedback and communication mechanisms with the community
6. Participates and/or organizes/coordinates extraordinary or regular coordination meetings within the Regional Service on topics related to the target groups.
7. Supervise and ensure the proper implementation and dissemination of standard operating procedures, instructions and other operational and administrative tools, issued centrally

78. RIS has developed within the Facilities a referral mechanism regarding gender-based violence cases and has appointed focal persons responsible for the management of such cases. This mechanism is dynamic and is renewed on a regular basis, to be kept up to date regarding all persons and organizations involved. The key objectives of this mechanism are the valid identification of a potential victim of gender-based violence, the management of his/her case and the referral of the case in order for the victim to receive the necessary services and information, thus ensuring his/her special reception needs.

79. The assigned focal points are informed about the incident either directly by the person of concern or another person, or through referral from another body and take immediate actions in order to address the immediate needs, provide full information to the beneficiary, assess the risk as well as develop an individualized intervention plan specially designed based on the request but also to the circumstances of each case. Case Management always begins with the consent of the person and with the assessment of the person's condition: whether they are in immediate danger, whether they are safe, whether there are life-threatening situations.

80. The Medical Care and Psychosocial Support Unit, staffed by EODY within the framework of the PHILOS II program, provides primary health services and specialized referrals for medical examinations as well as psychosocial support, following the Protocol for the Management of Incidents of Gender-Based Violence (EODY). During the 1st semester of 2024, project Hippocrates will succeed project PHILOS II, which envisions an even more comprehensive coverage.

81. During the management of an incident of gender-based violence, accompaniment is provided to the Police Station to report the incident if the person wishes so. In cases where legal representation is needed, the case is referred for legal support to external bodies. Given that gender-based violence in all its forms is a criminal offense and is severely punished by Greek law, the facility manager has the obligation to inform as required the co-competent authorities (Hellenic Police, Public Prosecutor's Office). Moreover, as gender-based violence causes physical, sexual and/or mental trauma, the victim and his/her family members are monitored by the Medical Care and Psychosocial Support Unit. In cases where immediate relocation of the person is not feasible and there is a high-risk assessment, temporary accommodation in temporary accommodation (e.g. hotel) is provided until the completion of the process of moving to the shelter for survivors of gender-based violence.

82. If deemed necessary for safety and protection reasons, and according to victim's will, a different accommodation scheme is being offered from bodies that provide specialized services, such as the Women's Counseling Centers, the NGO DIOTIMA, etc. Moreover, in cases where there are indications that the survivor of gender-based violence is a potential victim of human trafficking, the National Reporting Mechanism for the Protection of Victims of Human Trafficking is being informed.

83. Regarding standard operating procedures, we would like to clarify that RIS follows the "Guidelines for the protection of women and girls during the first reception in Greece and the asylum procedure" of the Ministry of Citizen Protection, the General Secretariat for Gender Equality and UNHCR as well as the "EUAA Guidelines for Reception Conditions (2016)", covering issues such as safety, hygiene, infrastructure, food provision, information, counselling and staff training. Specifically, all residents have access to medical and psychosocial services, education, recreational activities, etc

84. Also available is the Protocol for the Management of Incidents of Gender-Based Violence in the Migrant-Refugee Environment developed by EODY and describes the proposed approaches for assessing, dealing with and preventing the phenomenon in order to facilitate access and interconnection of victims. Also, the "GBV Pocket Guide", presented to the staff during 2023.

85. RIS encourages, where appropriate, the collaboration between international organizations, civil society and non-governmental organizations, giving priority to informal and non-formal education programmes, information on sexual and reproductive health and HIV prevention, gender equality and women's empowerment, human rights, physical, psychological development, communication and risk-reduction skills and to develop respectful relationships,

in full partnership with all professionals working in the field. In total, 78 Organizations with 1.617 members have been registered in the Registry of Non-Governmental Organizations established by the Ministry of Migration and Asylum. The Ministry of Migration and Asylum collaborates with a multitude of Civil Society / International Organizations (that work either inside or outside the Facilities), to provide a range of services and benefits to third country nationals. In particular, Non-Governmental Organizations that are active in matters of international protection, immigration and social integration and in accordance with Joint Ministerial Decision 10616/2020, are obliged to register in the respective registry, via electronic application and the submission of the required supporting documents. More specifically, the Ministry has progressed in stable and multi-year partnerships for the provision of the following services:

(a) medical care (b) psychosocial support (c) information regarding the rights and obligations of residents as defined by the European and national legislation and regulations including legal counseling and support, (d) distribution of non-food items (basic hygiene items, clothing, footwear, etc.), (e) implementation of educational programs (complementary to formal or formal education) and (f) implementation of skills development programs.

86. Moreover, the Case Management project (as being described above) aims to put in place a two-way communication mechanism between the professionals working in the field and the community in order to ensure that all women have access to relevant information and are able to promptly address issues that might raise, notably allegations of sexual exploitation and abuse

87. Regarding respect of the Non-Refoulement Principle (art 61), we would like to inform you that the Ministry of Migration and Asylum has appointed a Fundamental Rights Protection Officer in addition to establishing a Special Committee for Compliance with Fundamental Rights, responsible for monitoring the procedures and the application of national, EU and international legislation in the areas of border protection and the granting of international protection. In addition, the National Transparency Authority is responsible for investigating reports on allegations concerning the management of migration flows at the borders.

88. Overall, the Greek Government would like to clarify the following regarding the Principle of Non-Refoulement:

The Principle of Non-Refoulement, enshrined in Article 33 of the Geneva Convention of 1951, is the cornerstone of the international legal framework for the protection of refugees. Strict adherence to this principle applies to all cases of arrivals. The Hellenic Police has circulated clear orders and guidelines regarding the actions of HP officers for the protection of fundamental rights and dignity for all third country nationals crossing at the borders, paying particular attention to the right to apply for international protection and asylum procedures.

It is to be noted that no third country national in detention who has applied for international protection is returned until his/her application has been examined (*expression of will to make an application for international protection, registration of an application, examination at first instance, examination of an appeal, any appeal before the competent administrative courts*), in full compliance with domestic and international law and especially in accordance with the requirements of the Geneva Convention and the procedures foreseen in Directives 2013/32/EU, 2011/95/EU, 2013/33/EU, which have been transposed into our national legislation and are codified in Law 4939/2022 “*Ratification of the Legislation Code on the reception, international protection of third-country nationals and stateless persons and temporary protection in the event of a mass influx of displaced aliens*”, as well as the relevant case law of the Court of Justice of the EU and the European Court of Human Rights.

In addition to the above, it should be stressed that Greece remains mindful of, and committed to upholding, its human rights obligations under the international and EU legal framework when exercising its right and obligation to protect the national and EU's external borders, including when confronting and the mass influx of politically motivated arrivals (instrumentalisation of migration). Such a situation manifested itself in February/March 2020, when Greece was confronted with coordinated mass movements of thousands of third-country nationals, attempting to violently enter into its territory at the land borders with Türkiye.

The objective of border surveillance activities is the early detection of any attempt of illegal border crossing and the implementation of prevention and deterrence measures, according to the Schengen Borders Code. The competent border surveillance teams implementing patrolling activities within the Hellenic territory conduct national and EU Joint Border Operations, in cooperation with the European Border and Coast Guard Agency (Frontex). Both national authorities and Frontex follow a strict Code of Conduct, as mentioned in your report and every allegation of ill-treatment, including so-called pushbacks, on behalf of the deployed personnel, taking place during these activities, is investigated both at internal and/or EU level.

Moreover, it has to be mentioned that there are already several national measures in place, in order to monitor compliance of border surveillance activities with fundamental rights safeguards. In this regard, Greece has put in place a three-tier system to address complaints about alleged "pushbacks". More specifically, at administrative level, as soon as any information regarding such allegations or complaint reaches the competent Authorities, an affidavit administrative examination is ordered without delay. At the level of independent authorities, the National Transparency Authority is competent to investigate allegations of incidents, involving human rights violations at the borders; its investigations have, so far, not resulted in the substantiation of any alleged violations. In parallel, the Greek Ombudsman has also reviewed cases related to border protection and fundamental rights. Finally, such claims may be submitted to the competent judicial authorities. In addition, the Hellenic Police and the Hellenic Coast Guard, in the framework of Frontex Operations, implement two important follow-up mechanisms regarding potential violations of fundamental rights at the borders: (a) The first mechanism is called Serious Incident Reporting and concerns the right provided to any participant in the Agency's operational activities, who has reason to believe that a violation of fundamental rights has occurred, to report it to the Agency via the established reporting channels. (b) The second one is called Complaints Mechanism and provides the right to any person of any age who is directly affected by the actions or a failure to act on the part of staff involved in an Agency activity and consider themselves to have been the subject of a breach of their fundamental rights due to those actions or that failure to act, to submit a complaint free of charge to the Agency. Upon receiving such reports or complaints by the Frontex Fundamental Rights Office, which is the competent unit of the Agency to handle this material, the Hellenic Authorities provide feed-back concerning the alleged incidents and follow-up, regarding the subsequent investigations at national level. In order to better support the implementation of the Frontex Complaint Mechanism by national Authorities, the Hellenic Police and the Hellenic Coast Guard have appointed Liaison Officers to the Frontex Fundamental Rights Office in order to facilitate communication and follow-up with regard to fundamental rights compliance.

In addition, and in order to fully ensure respect of the Principle of Non-Refoulement, we inform you that special experts of the Greek Ombudsman, within the framework of its competences as stipulated in Law 3907/2011 as well as international, EU and Greek legislation, carry out external audits on planned readmission operations under the EU-Türkiye Joint Statement of 18 March 2016, as well as in any return procedure. More specifically, they visit detention areas, inspect the relevant case files, communicate with the third country nationals and supervise the

whole process, with a view to safeguarding their rights during the return operation. From the point of view of the Hellenic Police, all necessary data and information is provided in order to facilitate the Ombudsman with assessing each case when carrying out such inspections, in accordance with Article 4(5) of Law 3094/2003.

Futhermore, the Hellenic Police, when dealing with first reception activities, supporting the respective Authorities of the Ministry of Migration and Asylum, receive numerous trainings regarding the protection of fundamental rights of vulnerable persons, such as asylum-seeking third country nationals and especially women and children. Therefore, there are specific safeguards in place, in order to ensure that the dignity and physical integrity of women, especially pregnant women, and children are respected, in accordance with EU and international legal standards.

Body search is a standard operational practice, which is followed by law enforcement personnel, under national law and relevant internal orders, with strict adherence to the protection of fundamental rights. According to Greek law, body searches are performed in cases where there is a serious and sound suspicion or when there is an imperative need. In the case of border controls, body search is conducted when special conditions apply. For example, (a) when third-country nationals enter the accommodation facilities for the first time, in order to exclude the possibility that unlawful or hazardous items may be introduced in these facilities or (b) when there is ground to believe that such items i.e., drugs, weapons etc. are carried by persons. In any case, the body search must be performed in special facilities in a dignified manner. When carried out to a woman, the body search is performed by female officers, chosen by the officer who conducts the procedure.

In conclusion and taking into account the aforementioned remarks, the Hellenic Police, while implementing border security related measures, have demonstrated their commitment to the Principle of Non-Refoulement.