

# HOMELESS AND HOPELESS

January 2022

## Do the *human right* thing

Raising our Voice for Refugee Rights



**An assessment of the  
housing situation of  
asylum applicants and  
beneficiaries  
of international  
protection in Greece.**

The “Do the human *right thing*–Raising our Voice for Refugee Rights” project is implemented under the Active citizens fund program, with Project Promoter the Greek Council for Refugees (GCR) and Partner Organizations the Center Diotima, the International Rescue Committee Hellas (IRC) and Popaganda.

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More information: [www.activecitizensfund.gr/en/](http://www.activecitizensfund.gr/en/)

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# 1. Introduction

This report was created as part of the project: «Do the human right thing - Raising our Voice for Refugee Rights»; implemented under the programme Active citizens fund. It is the first of three reports in this series and covers access to housing for beneficiaries and applicants of international protection. The second and third report, both of which will be published in 2022, will respectively focus on access to employment, and access to healthcare for these groups.

The aim of this report is to highlight the issues faced by asylum seekers and refugees in Greece in accessing decent housing conditions, from the point of view of the universal right to adequate housing. The report is divided into two main sections: the first focuses on the legal framework, while the second assesses the housing conditions of the population concerned.

The focus on specific social groups relates to the experience and expertise of partner organisations, which have decades of experience in supporting refugees and asylum seekers (legally, psychosocially etc.). That being said, the issue of housing insecurity and/or homelessness clearly affects an increasing number of refugees and asylum seekers, in a multitude of different forms. Efforts to meet the housing needs of refugees and asylum seekers should therefore be integrated into a broader plan aimed at guaranteeing the right to housing for all, always prioritising the most socially vulnerable groups.

## Methodology

This report was created using data from partner organisations' databases, their field-based experience and literature research. A total of 11 interviews were conducted with asylum seekers

**“Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control.”**

**Article 25 (1) of the Universal Declaration of Human Rights**

and refugees (men and women), nine of which were based on a joint questionnaire developed by partner organisations.<sup>1</sup> Despite efforts to organise a focus group discussion with asylum seekers, this did not materialise due to COVID-19 related restrictions (finding the appropriate space/time to conduct the focus group).

The data collection was reinforced by meetings with representatives of the UNHCR in Athens, the Major Development Agency Thessaloniki (MDAT S.A.), and the Assistant Professor

in Social Policy at the Panteion University in Athens, Mr Nikos Kourachanis. This was aided by regular meetings with a team of refugees, who engage in voluntary advocacy work with the support of the Greek Forum of Refugees.

Even though it proved impossible to include all of the information collected due to the project's limited scope, the project partners wish to express their sincere gratitude to all participants for their invaluable contributions, which helped to better substantiate the current report.

## 2. Legal framework

The Universal Declaration of Human Rights (1948) introduced the universal right to (adequate) housing as a prerequisite for guaranteeing everyone's right to an adequate standard of living for the first time post World War II.<sup>2</sup> Since then, this right has been recognised in a series of international and European texts which have also been ratified by Greece,<sup>3</sup> and which prevail over any contrary provision of national/domestic law.<sup>4</sup> Among these are the 1951 Geneva Convention on the Status of Refugees,<sup>5</sup> which also addresses housing, and the European Reception Conditions Directive,<sup>6</sup> which commits EU Member States to provide housing to asylum seekers who lack sufficient resources to meet their basic needs as long as they remain in the asylum procedure.

In Greek legislation, the right to housing, with particular emphasis on the role of the state towards those who are "deprived of shelter

or [...] poorly housed", is recognised under the Constitution (Article 21(4)), as well as by L. 4052/2012,<sup>7</sup> which introduced for the first time the definition of homelessness in Greek legislation. But what does the enjoyment of the right to housing mean?

### 2.1. The interconnected nature of rights and states' obligations

First, the right to housing should not be narrowly perceived as amounting to having a "roof over one's head" and/or the ma-

**"There is excess moisture in this facility; water is dripping [down the ceiling and walls, and] it has no electricity. Because of the circumstances, I have mental health problems too. I would like to learn [Greek], to know the [Greek] society. But I can't do that from here."**

**M.A. is an asylum seeker from Syria who is staying in a refugee camp on the mainland.**

terial dimension of accommodation itself.<sup>8</sup> Human rights are interdependent, indivisible and interrelated. Therefore, access to housing affects, but is also affected by, access to other rights, such as the right to employment and the right to healthcare,<sup>9</sup> which will be examined in future reports.

In order for housing to be 'adequate', it must be characterised by non-discriminatory access to necessary facilities and infrastructure (e.g. safe drinking water, heating, domestic energy), and protection against weather risks and health threats. It should also and amongst others allow access to essential services (e.g. healthcare) and employment, be affordable and provide security of tenure.<sup>10</sup>

In light of this, Greek legislation recognises a broad definition of homelessness, linking it both to the complete absence of housing and to "the precarious access to adequate [...] housing that meets the necessary technical specifications and has basic services such as water supply and electricity".<sup>11</sup> Accordingly it also recognises that "homeless people are particularly [i.e. but not exclusively] those living on the street, in shelters, those who are by necessity temporarily hosted in institutions or other closed centres, as well as those living in unfit accommodation".<sup>12</sup>

This definition is also influenced by the European Typology of Homelessness and Housing Exclusion (ETHOS),<sup>13</sup> which the European Commission recognises as "the best European classification for homelessness".<sup>14</sup> This report adopts ETHOS' classification, which identifies four forms of housing exclusion: 1) rooflessness (e.g. living rough or in night shelters), 2) houselessness (e.g. living in women's shelters and temporary accommodation/reception centres, including those for people seeking asylum), 3) living in insecure accommodation (e.g. occupation of dwelling with no legal tenancy or under

threat of eviction) and 4) living in inadequate/unfit shelter (e.g. living in extreme overcrowding, in shipping containers or makeshift shelters).

## 2.2. Obligations of states

The right to housing creates a number of obligations on the part of states. In particular, states should provide (temporary) accommodation for asylum seekers, as mentioned above. They may also be obliged to provide housing for refugees, in application of human rights law.<sup>15</sup> At the same time, states have an obligation to protect and actively strive for the gradual, non-discriminatory fulfilment of the right to housing and the elimination of homelessness, including through the implementation of social housing programmes.

In addition, states must not carry out unlawful forced evictions. In cases of evictions "and in particular those involving large groups [of individuals]", they should examine any possible alternatives before the eviction, in consultation with the affected persons.<sup>16</sup> In cases where eviction would create a risk of homelessness and/or violation of other fundamental rights, states should undertake such measures «to the maximum extent of [their] available resources» in order to ensure solutions such as the provision of suitable alternative accommodation.<sup>17</sup> In practice, decisions by the Greek government have not always upheld this. For instance, the decision to proceed with the mass eviction of 10,000 refugees from reception system structures on 1 June 2020<sup>18</sup> should be checked for the degree of compliance with the above.

Furthermore, states should support all, and particularly vulnerable groups, in accessing affordable housing, through (e.g.) housing allowances and other measures, in accordance with their economic capacity – which cannot in itself be used as reason for inaction. They should also establish effective monitoring mechanisms to identify the number of homeless and/or inadequately housed people within their jurisdiction,<sup>19</sup> as a prerequisite for effective policies. Yet, Greece still lacks systematically available and specialised statistics on the population of homeless people in the country, apart from occasional or local records.<sup>20</sup> For example, the latest statistics available on the number of homeless people refer to a survey, accounting for only 7 of the 332 municipalities in Greece, which took place in May 2018.<sup>21</sup>

Lastly, notwithstanding states' legal obligations, the housing issue has increasingly gained political attention at the European Union level.<sup>22</sup> The year 2021 marked the launch of the European Platform on Combating Homelessness as a distinct mechanism of action in the context of the implementation of the 20 principles of the European Pillar of Social Rights, of which the 19th principle relates to housing.<sup>23</sup>

## 3. The situation in the field

### 3.1. General overview

According to the latest published data from the Ministry of Migration and Asylum,<sup>24</sup> a total

of 41,951 asylum seekers remained in Greece in October 2021, based on the number of pending asylum decisions. The number of beneficiaries of international protection was estimated at 100,000, according to statements by the Minister of Migration and Asylum.<sup>25</sup>

The lack of sufficient data as regards their housing situation makes it impossible to draw sound conclusions for the whole population. For instance, up to October 2021, 18,147 people lived in camps and 4,327 in Reception and Identification Centres (RICs) in Greece. Among them, 340 were unaccompanied children. In addition, by November, 15,477 people lived in apartments funded by the accommodation programme ESTIA, amongst whom 2,451 recognised refugees,<sup>26</sup> while 1,791 unaccompanied children lived in shelters and Supported Independent Living apartments.<sup>27</sup> Yet although such quantitative data outlining the number of residents per accommodation facility operating under the competence of the Ministry is published regularly,<sup>28</sup> with the exception of ESTIA residents, this does not give an indication of their legal status.

The issue is further complicated by the fact that an unknown but significant number of people who have already been granted international protection status in Greece, as well as people whose asylum applications have been rejected, continue to reside in/return to camps and/or are forced to live on the streets and in precarious housing conditions, due to the lack of alternatives (integration or return).

The decision by the Greek government to unilaterally designate Turkey as a "safe third country" for people from Syria, Afghanistan, Bangladesh,

Pakistan and Somalia in June 2021,<sup>29</sup> despite a wealth of evidence to the contrary<sup>30</sup> and the ongoing suspension of returns to Turkey since March 2020, further exacerbates this problem by pushing men, women (sometimes even pregnant women) and children into a legal limbo, without access to housing and/or to the means of satisfying their basic needs (e.g. medical care).<sup>31</sup> Finally, there is also a lack of data on the number of people whose asylum requests have not yet been registered, who in the meantime lack access to reception conditions – particularly housing.<sup>32</sup>

## 3.2 Housing conditions

### 3.2.1 Reception system for asylum seekers

According to the Reception Conditions Directive, Greece, like all EU Member States, must provide material reception conditions, including housing, to people seeking international protection. These conditions must “ensure [...] an adequate standard of living which guarantees their subsistence and protects their physical and mental health”.<sup>33</sup> However, despite considerable progress, Greece continues to fail to meet the criteria of this obligation, as has been highlighted several times since 2011 including by the European Court of Human Rights.<sup>34</sup>

The reasons for this failure vary and are clearly connected to the lack of a comprehensive EU-wide mechanism for sharing responsibility for protecting refugees. However, progress is largely hampered by political choices at EU and national level in relation

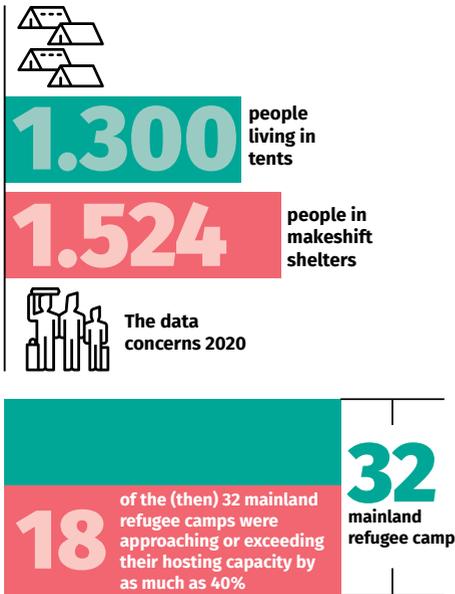
to the management of the issue. The most prominent example is the growing trend of housing asylum seekers in large-scale camps, which have for years had a negative impact on human rights. These camps also hamper integration prospects, which are crucially dependent on early support of both newcomers and receiving societies.<sup>35</sup>

### *Reception and Identification Centres (RIC) on the islands and mainland camps*

In September 2020, 18 of the (then) 32 mainland refugee camps were approaching or exceeding their hosting capacity by as much as 40%, resulting in more than 1,300 people living in tents and 1,524 in makeshift shelters.<sup>36</sup> The situation was worse still on the Greek islands, which in the first months of 2020 hosted more than 38,000 people in Reception and Identification Centres (RICs) designed to accommodate less than 6,200<sup>37</sup> - the majority of whom were families with children, forced to live in extremely unhealthy conditions, without meaningful access to health care.

In recent months, overcrowding on the islands has been reduced. As of 18 November 2021,<sup>38</sup> none of the islands' RICs were exceeding 30% of its planned capacity, with the sole exception of the Kos Reception and Identification Centre (RIC), which was close to 70% capacity. Similarly, on the mainland, out of a total of 26 camps in October 2021, only Elaionas refugee camp continued to exceed its capacity.<sup>39</sup>

Nevertheless, the so-called «decongestion» of the reception centres is the result of a number of factors. These include the reduced number of arrivals in the midst of a pandemic,



the transfer of thousands of people from the islands to the mainland – often without a plan to ensure their housing<sup>40</sup> – and the speeding up of asylum procedures, often to the detriment of their fairness.<sup>41</sup> Against this backdrop, there were also a multitude of reports alleging violent and illegal pushbacks from Greece,<sup>42</sup> which endanger the life of women, men and children, and clearly violate the core of the international protection system in place since World War II, notably the principle of non-refoulement.

Despite reduced overcrowding, camp residents continue living in close proximity and in unsanitary conditions. Indeed, as demonstrated in a recent study,<sup>43</sup> the risk of COVID-19 infection among residents in reception facilities was up to three times higher than the

general population. Low vaccination coverage, which did not exceed 33% in the accommodation facilities operating under the Ministry of Migration and Asylum at the end of October 2021,<sup>44</sup> also raises concerns about the health of residents.

There has been a mental health and protection crisis on the islands since the creation of the so-called hotspots. This has been further exacerbated by the COVID-19 pandemic. The disproportionate restrictions that were imposed and continue to be enforced on refugee camps in response to the pandemic<sup>45</sup> have compounded the mental health challenges faced by residents<sup>46</sup> – a large number of whom have suffered violence, abuse and/or exploitation in their country of origin, on the route to Europe, and after their arrival in Greece. The resilience of people with additional vulnerabilities continues to be challenged in the RICs, and especially of those belonging to groups facing discrimination, such as the LGBTQ community.<sup>47</sup>

The new model of Closed-Controlled Access Facilities (CCFs), which have already become operational in Samos, Leros and Kos, and the walling of mainland refugee camps, are likely to further undermine the wellbeing of all residents, making it even more difficult to access specialised services and/or education in nearby communities. At the same time, their isolation from society, which is exacerbated by inadequate access to public transport,<sup>48</sup> also creates barriers to the integration process of those who will remain in Greece.<sup>49</sup> As the European Commission points out,<sup>50</sup> “[i]ntegration happens in every village, city and region where migrants live, work and go to school or to a sports club” and therefore clearly not

within gated camps, away from urban areas. It is telling that less than two months after the opening of the first Closed-Controlled Centre in Samos, reports indicate that the residents are deeply anxious about their confinement.<sup>51</sup>

It is worth highlighting here the special reception system in Kos where, since January 2020, almost everyone arriving on the island seeking protection, instead of hospitality, has been held in administrative detention, in highly unsuitable conditions, without adequate access to medical and (in particular) psychosocial support.<sup>52</sup> The recipients of this policy have included women, survivors of gender-based violence, victims of torture, members of the LGBTQ community, families (and single parents) with young children, but also unaccompanied children, who were wrongly registered as adults at the initial registration stage.<sup>53</sup>

At the same time, both on the islands and the mainland, reports of disruptions to the electricity supply continue.<sup>54</sup> Given that people are still living in tents and makeshift shelters in the refugee camps on the mainland, the drop in temperatures in recent months raises concerns that residents will be forced to suffer yet another freezing winter without being able to keep warm.

### *B. ESTIA accommodation programme and urban accommodation*

The ESTIA accommodation programme<sup>56</sup> started operating in 2015 and has since housed 80.000 people – mostly vulnerable families – in apartments within the urban fabric of 18 Greek cities. As the Ministry for Migration and Asylum points out, “living in the city allows

a sense of normality, and provides better access to services, including education and health”.<sup>57</sup>

The comparative benefits of the programme are confirmed by the limited number of questionnaires collected under the project up to the time of writing. In particular, among the five interviewees living in ESTIA apartments, only one expressed dissatisfaction when asked

**“[Here] I can integrate without any issue. I also have a very good female neighbour who helps me [in order to find] a doctor, and [gives me detailed instructions on how] to go somewhere. I’ve lived in this house for a year and a half. I don’t want to leave this place due to my female neighbour, too.”**

**A.A. is a single mother, recently recognised refugee, who was hosted in an ESTIA apartment at the time of communication.**

about his stay and the stay of his family members. However, this was for reasons that related to the distance between his place of residence and Athens, and the difficulty in accessing the labour market, rather than housing conditions as such. Two people highlighted the possibility of meeting Greek citizens as positive.

On the negative side, four out of the five people

questioned stressed that the conditions in which they initially received the apartments were not decent, reporting problems such as the existence of bed bugs and insects, dirty walls and mattresses. The issue should be further investigated, taking into consideration its possible connection with the serious financial cuts the programme suffered last year.<sup>58</sup> Meanwhile, it should not be overlooked that the temporary nature of people's stay in apartments under the Greek ESTIA accommodation programme (i.e. for the duration of their asylum procedure) does not equate with access to the right to housing, which seems to exacerbate residents' anxiety over the future.

Beyond ESTIA, people who were able to rent accommodation independently are no longer eligible to access financial assistance, according to new rules set out by the Ministry for Migration and Asylum on 1 July 2021. To be eligible for financial assistance, they must leave their homes and move to facilities under the supervision of the Ministry and/or its partner organisations. As a result, people living in their own homes were forced to return and live in a refugee camp, separated and isolated from their community, in order to receive financial assistance and to be able to meet their basic needs. This is another policy that prevents, rather than promotes integration.<sup>59</sup>

### *C. Homelessness and Living in Precarious Conditions*

The number of asylum applicants, as well as beneficiaries of international protection, who experience complete homelessness and live in abandoned buildings/occupations (as squatting tenants) remains unknown, as is the case

**“When we came here, the place wasn't clean. Mattresses were not clean. Now I put blankets so that we can sleep. [However] I feel insecure because I don't know what's gonna happen to us. The security [of residence] here is temporary.”**

**A.L. is an asylum seeker, mother of 6 children, who lives with her family in an ESTIA apartment.**

with people unable to access stable housing, which results in their moving from one place to another. However, it is clear from the experience of partner organisations that there is an invisible crisis affecting even extremely vulnerable people, who lack shelter and protection.

For instance, from early 2020 to mid-November 2021, the services of the Greek Council for Refugees received requests for support from 1,461 people registered as homeless and/or squatting tenants<sup>60</sup> – including women, victims of human trafficking, as well as unaccompanied children. Between January and November 2020, the overwhelming majority of these cases (94%) concerned asylum seekers, including those whose asylum applications had not yet been registered, mainly in Athens (48%) and Thessaloniki (31%), with the remaining cases (5-6%) involving persons already granted international protection status in Greece.

Diotima Centre reports similar findings: in 2020, almost 24% (out of a total of 785) of the survivors of gender-based violence (GBV) they supported were referred to housing agencies, either because they were roofless or because they lived in precarious conditions, such as in RICs and refugee camps. The corresponding figure for 2021 was 22%.<sup>61</sup> In this context, it is important to stress the difficulties encountered when seeking to immediately remove people who have experienced physical and/or sexual violence (GBV survivors) from an abusive environment into temporary accommodation facilities in Greece (e.g. RICs), also due to the inadequacy of the public housing system.<sup>62</sup>

Finally, living conditions of unaccompanied children continue to be precarious. Despite significant improvements in recent years, such as the legal abolition of “protective custody” (i.e. detention) and the growing emphasis on Supported Independent Living schemes (SILs), many unaccompanied children continue to face homelessness/unsafe living conditions. This is highlighted by the 1,122 housing requests received by the National Emergency Response Mechanism between April and October 2021 that concerned unaccompanied children.<sup>63</sup> The lack of options for the provision of accommodation for unaccompanied children reaching adulthood, which has been examined in other reports,<sup>64</sup> also remains an issue of concern.

### **3.2.2. Beneficiaries of international protection: limited options after recognition**

Since March 2020, people granted international protection in Greece are required, with few

exceptions, to leave the premises where they were hosted during the asylum procedure. Their financial allowance is also suspended within 30 days of receiving their positive asylum decision.<sup>65</sup> With the implementation of these provisions, thousands of refugees – even mothers with young children, pregnant or single women, the elderly and patients with chronic health conditions – were left without shelter, often ending up in public squares,<sup>66</sup> exposed to risks to their safety and wellbeing. As indicatively highlighted by Diotima Centre,<sup>67</sup> which specialises in the support of survivors of gender-based violence, “homelessness causes or exacerbates the psychosocial problems of the survivors”, while one out of three survivors supported by the organisation between June and November 2019 had experienced at least one incident of abuse, including rape, directly linked to homelessness.

Many of these people and families were compelled to return to and/or remain in camps beyond the new 30-day limit in order for their basic needs to be covered – water, food, shelter and primary healthcare. The fact that thousands of beneficiaries of protection remain in refugee camps, despite the substandard living conditions, reveals their lack of viable alternatives. This is a direct result of Greece’s failure to develop an effective and resourced integration policy, which continues to be dependent on the Helios programme<sup>68</sup> and cannot meet the full range of needs.

By way of illustration, a total of 33,688 beneficiaries of international protection enrolled in the Helios programme between September 2019, when it first started, and November 2021. Of those, less than 50% (15,960 people or 6,316

households) were able to obtain the EU-funded rent subsidy to cover (part of) their rent. Just 2,099 people continued to benefit from this subsidy in November 2021.<sup>69</sup> For comparison, between January 2019 and October 2021, more than 67,000 persons received international protection status in Greece<sup>70</sup> – twice as many as the total number who registered for Helios.

Although the reasons for the divergence vary, these figures highlight a gap in the smooth transition of beneficiaries from the reception system to an autonomous life within the receiving society. This is partly due to the programme's requirements, which beneficiaries face difficulty in meeting, as well as their lack of opportunities for learning Greek while they are still in the asylum procedure.<sup>71</sup> Other obstacles include the criteria for enrolment in the programme, which exclude people who were granted international protection before 2018, and those who were not residing in official reception sites at the time of recognition of their status.<sup>72</sup> The latter could be seen as promoting dependent living in structures at the expense of prospects of restoring a degree of autonomy, excluding those who have managed to house themselves, but also people who – because of the gaps in the reception system – were forced to live on the streets or in precarious housing conditions. Finally, a significant obstacle remains that access to the rent subsidy requires the presentation of a lease contract and therefore the possibility of covering at least two months of rent in advance, with resources that the newly recognised refugees often do not have.

### *A. Challenges in accessing social welfare*

The conflict between legislation and practice also exacerbates the poor housing of refugees in Greece. Although under national legislation beneficiaries of international protection have a right to access medical care and social assistance “in accordance with the conditions applicable to Greek citizens”,<sup>73</sup> legal and administrative barriers prevent, in practice, equal enjoyment of these rights.<sup>74</sup> For example, in order to access the national housing allowance, beneficiaries of international protection must have completed five years of legal residence in the country, calculated from the time they submitted their asylum application.<sup>75</sup> This already excludes the majority of over 97,000 people who have been granted protection status in Greece since 2016.<sup>76</sup> Meanwhile, as reflected in an increasing number of EU Member States' court decisions,<sup>77</sup> to this day refugees in Greece are at serious risk of inhumane or degrading treatment and unable to cover their most basic needs, such as housing.

Finally, those who have managed to access social welfare face yet another obstacle: a long waiting period for the renewal of their residence permits, which could take up to a year. In the meantime, the attestations they receive from the competent authorities (Police or Asylum Service) do not meet the necessary requirements for accessing social rights (e.g. the documents do not contain a photograph of the person, or explicit reference to the date of entry into force and expiry of the validity of the certificate), thereby disrupting their access to social welfare, healthcare and the labour market,<sup>78</sup> making it harder to access secure housing.

In any case, as with other social issues, when it comes to addressing the housing (or integration) challenges faced by refugees in Greece, social benefits can play a part, but the response should not be limited to such an approach. On the contrary, given that the housing challenge affects an increasing number of people and social groups, both in Greece and in the EU, core actions should include long-term and inclusive policies on social and/or affordable housing aimed at the benefit of society as a whole, prioritising those who are in a socially less favourable position, such as refugees.

## Conclusions

This report highlights some of the issues still faced by asylum seekers and beneficiaries of international protection when seeking to access adequate housing in Greece. It is clear that, based on ETHOS' typology, outlined in the second part of this report, the gaps and the temporary nature of housing within the reception system for asylum seekers, as well as the ongoing exposure of refugees to conditions of poverty and homelessness or precarious housing, have been undermining the right to adequate housing. In addition to legal obligations, which bind Greece to improving reception conditions, the issue should be considered comprehensively and inclusively, with the aim of defending the right of all to adequate housing - in particular the most vulnerable, such as single women, people with mental health problems, and unaccompanied children.

To this end, on the basis of their programmes' experience and specific fields of expertise, the partner organisations of the project make the following recommendations.

## Indicative recommendations

### The Greek state should:

- Ensure the timely and inclusive implementation of the new National Strategy for the Social integration of asylum seekers and beneficiaries of international protection published on 29 November 2021. While the partner organisations welcome the new Strategy, they reserve the right to provide more extensive comments, following a full analysis.<sup>79</sup>
- With the assistance of the European Commission, make every effort to accommodate asylum seekers in small-scale shelters, within the city, which will be staffed by qualified personnel, where appropriate.
- Given the lack of sustainable housing alternatives, refrain from evicting refugees from the reception system where this would reasonably lead to a risk of homelessness and/or precarious living. In the same context, every effort should be made to find alternatives, with the assistance of the EU and in consultation with refugees and local communities.
- Adopt safety and protection measures in the management of reception facilities

which promote the protection and dignity of residents, with a focus on the safety of women and persons subject to discrimination, such as members of the LGBTQ community, without prejudice to their rights and freedoms.

- Make good use of and strengthen the available tools and the existing social housing and/or affordable housing pilot projects in Greece, which should be inclusive and could also prove beneficial for local economies.<sup>80</sup>
- Refrain from the automated imposition of administrative detention, particularly in cases of vulnerable persons, such as GBV survivors. Detention is a measure of last resort and should only be employed in exceptional cases where alternative measures cannot be applied.
- For GBV survivors requiring immediate removal from their abuser, there should be safe temporary accommodation facilities, given the lack of space in public shelters.
- Systematise the registration of the number of people living in complete homelessness and/or in extreme precarious conditions and regularly publicise relevant statistics and data. This should lead to the development of targeted inclusive policies to combat homelessness, on the basis of the specific needs of the people concerned (e.g. mental health problems), including GBV survivors and members of the LGBTQ community who are often subject to multiple exclusions. To this end, support for local governments, as well as the assistance of civil

society, can be crucial, given their relative proximity to the populations of concern.

- Ensure that the building infrastructure and related logistical equipment of facilities under the ESTIA accommodation programme meet the necessary decent living criteria as a condition for their inclusion in the programme's housing stock.
- Accelerate the implementation of the programme 'Helios Junior' to fill the gap which arises during the transition of unaccompanied children to adulthood, also taking advantage of the experience gained from the previous operation of the Helios programme.
- Consider the proposals of, and consult with, the civil society actors implementing and/or subsequently invited to implement the housing programmes (e.g. ESTIA accommodation programme, Supported Independent Living) at the stage of the preparation and planning of the funding of these programmes, in order to avoid gaps during the implementation phase.
- Fill the gap that arises when renewing refugee residence permits. The issue could also be resolved by issuing certificates meeting the technical standards of the certificates referred to in Article 9(5) L. 4251/2014 (e.g. photograph of the person, explicit reference to the date of entry into force, and expiry of the validity of the certificate and unique reference number), and with the explicit provision in the law that holders of such certificates have the same rights as if they had the residence permit.

- With regard to the Helios programme in particular, special consideration should be given to simplifying procedures and, in particular, to the separation of the allowance intended to assist refugees in finding shelter from the need to present a lease contract.
- Review the decision to designate Turkey as a safe third country which, among other grave problems, leads to an increased risk of poverty and homelessness for people seeking asylum.

## **The European Commission should:**

- As guardian of the Treaties, actively ensure that Greece complies with its legal obligations in relation to the reception of asylum seekers. Particular emphasis should be placed on ensuring that those who cross the Greek border are not detained by default, and that restrictions on movement, in law and in practice, comply with international and European human rights standards.
- Support Greece in implementing inclusive social housing policies, through logistical and material support.

## **EU member states and the European Parliament should:**

- Revise the proposal for a New Pact on Migration and Asylum presented in September 2020 which, instead of solving the structural gaps in the European asylum system, such as the lack of responsibility sharing for the protection of refugees, continues to put pressure on host States and communities at the external borders of the EU. This inter alia has inevitable and negative consequences for both the rights of asylum seekers and the capacity of host societies to respond to the integration needs of those recognised as beneficiaries of international protection.

1. The questionnaire is divided into four main sections, covering the demographics of the participants, housing, employment and health. Despite the fact that only a limited number of completed questionnaires could be used up to the time of writing, this data gives us a good idea of the participants' experience in accessing to housing. The collection/analysis of questionnaires will continue during the course of the project, when it will be possible to present the results more extensively.
2. Article 25 (1), Universal Declaration of Human Rights.
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4. As per article 28 (1) of the Greek Constitution "[t]he generally recognised rules of international law, as well as international conventions as of the time they are ratified by statute and become operative according to their respective conditions, shall be an integral part of domestic Greek law and shall prevail over any contrary provision of the law".
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