GREECE:
Children on the move
September - October 2021 update

*Ammar and *Zafirah
at the Closed Controlled Access Center in Samos
October 2021
At a glance:

- In September and October, most new arrivals of children in Greece were largely to the mainland. New arrivals remained at a low level, likely the result of a combination of illegal pushbacks by the Greek authorities and the Turkish governments continued restrictions on onward movement of refugees.

- On 31 October a boat with 375 asylum seekers from Afghanistan and elsewhere docked on the island of Kos, following reported attempts by the Greek coastguard to tow it from its territorial waters. The Turkish flagged vessel was initially headed for Italy before encountering engine trouble near the island of Crete.

- The situation of refugee and asylum seekers across the country deteriorated with the halting of cash assistance previously distributed by UNHCR, as well as catering services in camps.

- A new Closed Controlled Access Center (CCAC) was opened on the island of Samos on 18 September. It is the first of five new EU-funded facilities, reinforcing the segregation and dehumanization of refugees and asylum-seekers who have entered Europe.

- The new school year saw an improvement on the inclusion of refugee and migrant children compared to last year, although issues remain.

- The Greek government passed a new law which strips procedural safeguards for deportations and returns, restricts possibilities for legal stay on humanitarian grounds and criminalizes NGO work to assist people in the Aegean.

- At the end of October, the EU voluntary scheme on relocation was due to come to an end: out of a target of 1,600 unaccompanied children, 1,054 have been relocated since 2020. There are currently still over 2,000 unaccompanied children in the country.

- The government of Greece's response to the crisis in Afghanistan remains marked by a stated desire to restrict and prevent the possibility of increased arrivals in Greece, with the open endorsement of politicians from other EU Member States. The government is implementing the Joint Ministerial Decision designating Turkey a “safe third country” for returns of asylum seekers from Afghanistan (and four other countries), notwithstanding recent developments.
OVERVIEW

As of June 30th 2021, Greece is hosting approximately **40,061 asylum seekers**¹ according to the official data provided by the Ministry of Migration and Asylum (MoMA), whereas according to UNHCR’s factsheet the same population amounts to **60,873 people**². There are approximately **103,136** recognized refugees in Greece, according to the UNHCR, although the actual number present in Greece may be lower³. MoMA reports that only approximately 10% of the asylum seekers (4,490 people) live in the Eastern Aegean Islands and the vast majority of them are hosted in mainland⁴.

Total land and sea arrivals since the **beginning of 2021 amount to 6,587 people**⁵.

**Humanitarian situation**

**Cash assistance paused - Catering services restricted**

EU-funded cash assistance for asylum seekers⁶, which has been distributed for more than four years by UNHCR, will from 1 October onwards be managed by the Greek authorities⁷. The handover caused immediate problems, and no cash assistance has been distributed for October 2021, which has hit the thousands of beneficiaries and their children that live in reception facilities without catering services particularly hard. MoMA’s announcements to date indicate there may be an indefinite delay.⁸

At the same time, some catering services contracts in camps have expired and existing providers are now excluding beneficiaries that have had their asylum case examined⁹. The combination of the halting of cash assistance and catering services is seriously affecting the food security of asylum seekers¹⁰ and NGO efforts to assist are not enough to stem a growing crisis. And as parents living in Nea Kavala point out in despair: “**Do your kids go to school without food?**”¹¹

**On the Mainland**

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³ ibid. Also note that according to MoMA, the beneficiaries of international protection (refugee and subsidiary protection) in Greece in the last 5 years only amounts to 95,957 people, see table 10 referred to in footnote 1
⁴ ibid., footnote 1
⁵ The majority arrived by land, UNHCR Operational portal, Mediterranean Situation, as of 17 October 2021, available at: https://bit.ly/3jgMsQk
⁶ The project started in spring of 2017, for more see Press Release UNHCR hands over the management of the cash assistance programme for asylum seekers in Greece to the Greek Government, 30.09.2021, available at: https://bit.ly/2YYajNc
⁷ See Official Government Gazette (OGG), issue B, 4496/29.09.2021. The amount distributed remains the same, namely 75€/month for a single person, up to 210€/month for a 4-membered family where there is a catering service - if there is not, the amount is double (art. 4)
⁸ See MoMA’s call for tenders to banking institutions to issue cash assistance prepaid cards, was only published on 8 October 2021, available at: https://migration.gov.gr/proplromenes_kartes_oikonomiko_voithima/
⁹ Giorgos Dagalkis, Efermeda ton Syntakton, They let thousands of refugees in hunger, 11 October 2021 (in Greek), available at: https://bit.ly/2YUr77A
As of 7 October 15,135 asylum seekers reside in 22 Reception and Identification Centres (RICs) managed by the Hellenic Armed Forces, 17 of which are found in mainland currently hosting 11,308 People of Concern (PoCs). As of September 2021, IOM provides Site Management Support Services (SMS) to the Greek Government for 27 mainland long-term accommodation sites, hosting 18,874 PoCs, 40% (7,568) of whom are children.

Separately, around 17,580 asylum seekers and refugees are hosted under the ESTIA urban accommodation scheme in apartments, almost half of whom are children (46%). Apartments under ESTIA are usually shared and according to the Ministry of Asylum and Migration (MoMA) the three most common vulnerabilities that can sustain the referral to the scheme are serious medical conditions (11%), children at risk (4%) and single-headed families (3%). The majority of ESTIA beneficiaries are Afghans (35%), followed by Syrians (21%) and Iraqis (14%).

GCR beneficiaries have reported incidents of being placed in apartments that are unhygienic or unsafe (humidity, broken doors etc.), which remain un repaired for long, if repaired at all. Also, in placing vulnerable people in accommodation, MoMA calculates that just 10 sq.m. per adult as appropriate, with children not being taken into consideration. That means that 3 single-headed families with 2 children each (6 persons) could, according to MoMA, be accommodated in a single 30 sq.m. apartment (3 adults x 10 sq. m).

Living conditions in the “open”, long-term accommodation sites are poor. In Nea Kavala, Northern Greece, hosting approximately 1,200 PoCs, the isolated camp is not served by public transportation, and is now surrounded by a huge concrete wall, that cuts off the sound and blocks the view. Its residents refer to it as “an open-air prison”.

**On the Aegean Islands**

As of mid-October 2021, official statistics regarding the refugee and migrant population residing in the Eastern Aegean islands read as follows:

<table>
<thead>
<tr>
<th>Island</th>
<th>Lesvos</th>
<th>Chios</th>
<th>Samos</th>
<th>Leros</th>
<th>Kos</th>
</tr>
</thead>
<tbody>
<tr>
<td>Occupancy RIC or CCAC / Capacity</td>
<td>3,060/8,000</td>
<td>218/1,014</td>
<td>276/2,040</td>
<td>121/860</td>
<td>127/816</td>
</tr>
<tr>
<td>Total refugee/migrant population on the island</td>
<td>3,352</td>
<td>269</td>
<td>289</td>
<td>122</td>
<td>301</td>
</tr>
</tbody>
</table>

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15 as of 31 August 31 2021, ibid.
16 ibid.
17 Information shared by an ex-ESTIA social worker at the Advocacy Working Group of 02 September 2021
20 Standing for Closed Controlled Access Center, now operating only in Samos
In Lesvos PoCs are still not allowed to exit Mavrovouni camp on Sundays. Following a written inquiry of NGO’s operating locally, including GCR, the camp’s management replied that a) exit is permitted daily from 7 a.m. to 9 p.m, and according to specific “exit list”; b) “on Sundays the supermarkets, stores, bakeries etc are closed”, so exit on Sunday can be permitted only for “urgent extraordinary needs” or “for church attendance after the relevant request has been submitted” c) all RIC residents can exit the camp if they have a certificate for an appointment with a doctor, lawyer, psychologist and/or social worker, and upon approval of the administration.

NGOs report that Kara Tepe RIC was left for more than 10 days without petrol for the generators and, consequently, electricity, while ex-Moria residents are expected to spend a second winter in tents amidst the pandemic. According to MSF, post-traumatic stress disorder and symptoms of depressive disorder are among the most commonly seen by its medical teams, with an incidence rate of close to or over 50% in both child and adult patients.

The new Closed Controlled Access Center (CCAC) in Zervos site in Samos was opened on 18 September. It is the first of five new EU-funded facilities, with others to be established on Lesbos, Chios Kos and Leros. The principal logic of these sites is to contain, marginalize, dehumanize asylum seeking people at Europe’s borders and instead of facilitating asylum seekers’ social inclusion and integration.

The Zervos site is situated far from the city center in Vathy, and a newly established bus line is expensive and difficult for the camp population to afford. There are also no Safe Space for women, girls or LGTBQI+ people, “although the majority of the reported cases of gender-based violence take place within the RIC.”

In Chios, in Tholos site, where the island’s CCAC is planned to be established, the Municipality decided to fence it, in order to declare its opposition to the construction plans of the site but also to secure its ownership of the land claimed by the State on behalf of the Ministry. The municipality of Chios has sought judicial protection from the Council of State regarding its claims to the land on which the Tholos site is planned.

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22 Information shared at the Lesvos Legal Aid Subworking Group meeting of 28 September 2021
23 For more information, see Lesvos News of 7 October 2021 available at: https://bit.ly/3vqoply
25 Medecins San Frontieres, Greece: One year after Moria fires, Europe continues to deny dignity to migrants and asylum seekers on the Greek Islands, 07 September 2021, available at: https://bit.ly/3AU9iD0
26 MoMA’s presentation of 23 September 2021 is available at: https://bit.ly/3n1Ytdn
27 See the Joint Policy brief Walling Off Welcome: New reception facilities in Greece reinforce a policy of refugee containment and exclusion. Also MSF, Opinion, “We can only help our patients to survive” new camp on Samos, 17 September 2021, available at: https://bit.ly/3AWsW2
28 According to information provided by GCR beneficiaries in Samos, the one-way ticket amounts to 1.60 euros per person (same price for adults or children). That means that for a 4-membered family to visit the city center for supplies (e.g. pharmacy, supermarket) will need to pay approximately 13 euros each time they wish to go to town and back.
30 Chios News, Fencing by the Municipality of Chios against Mitaraki’s plans (in Greek), 08 October 2021, available at: https://bit.ly/3n7neo
"Last year I went to school for 3 months and then due to COVID-19 I stopped; then there was nothing to do. So I started and still am to this day volunteering for an NGO here in the camp, doing activities with children. I feel good volunteering, I learn better English and at the same time I help people.

At first, our asylum application was rejected. We had to file an appeal; now, that at last we have a positive result, I feel much better. A few days ago I turned 18 and I feel that here in Greece things are very difficult; in the future I would like to go to another country...

Here at the camp there is nothing that women or girls could do; there’s only a stadium, but as you can understand this is not a place to keep women busy. I also see children who have nothing to play with, no parks, no play or learning spaces for them. It would be very good to open a kindergarten so that small children can go and spend their time, learn something.

What I don’t like here is the way the security personnel do the control; they check you like you have done something wrong. Emptying your bags in front of other people and especially having men to see what a woman has in her bag can be embarrassing, it’s not nice. They could just do it politely.”

* Zafirah, 18 years old girl from Syria, currently living in Samos Closed Controlled Access Centre

KEY DEVELOPMENTS

In Greece

Turkey as a “safe third country”

On 31 October a boat with 375 asylum seekers from Afghanistan and elsewhere docked on the island of Kos, following reports that the Greek coastguard had attempted to tow the boat into international waters as part of a “pushback” to Turkey. The Turkish flagged vessel was initially headed for Italy before encountering engine trouble near the island of Crete where it was intercepted by the Greek coastguard. Migration Minister Notis Mitarachi stated that this was an exceptional case and called for EU support to “ensure the EU/Turkey statement is upheld”, and that a government priority was seek to return of nationals from Bangladesh and Pakistan.

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31 Pushback Ongoing Involving 400+ People, Aegean Boat Report [https://aegeanboatreport.com/2021/10/29/pushback-ongoing-involving-400-people/?fbclid=IwAR0nhXL4DTODWGFp6O1321q7eIF8r_JADFOM9wXb3pmENDER.mphHbKbQ](https://aegeanboatreport.com/2021/10/29/pushback-ongoing-involving-400-people/?fbclid=IwAR0nhXL4DTODWGFp6O1321q7eIF8r_JADFOM9wXb3pmENDER.mphHbKbQ)
33 Migration Min Mitarachi: Effort underway to send back migrants on Turkish-flagged vessel, ANA-MPA, 1 November 2021 [https://www.anna.gr/en/article/597412/Migration-Min-Mitarachi-Effort-underway-to-send-back-migrants-on-Turkish-flagged-vessel](https://www.anna.gr/en/article/597412/Migration-Min-Mitarachi-Effort-underway-to-send-back-migrants-on-Turkish-flagged-vessel)
The Greek Council for Refugees and Refugee Support in the Aegean filed a petition for the judicial annulment of the Decision designating Turkey a “safe third country”\(^{34}\). This Decision risks the rapid rejection of asylum seekers from the five countries that account for over 67% of asylum applicants in the country. The policy has not been revisited in light of recent developments in Afghanistan and the Taliban takeover of the country, nor the fact that the government recognises there have been no returns to Turkey for the last year and a half.\(^{35}\)

**New law on deportations**

At the beginning of September a new law\(^{36}\) on deportations and returns was passed. Under the new law, deportations and returns are now conducted more quickly and with fewer procedural safeguards, and the possibilities for legal stay on humanitarian grounds is further restricted.\(^{37}\) It also shortens deadlines and increases fees to apply for asylum a third time, and includes provisions criminalising the lifesaving work of NGOs assisting people at sea. The passing of the new law provoked reactions both nationally, as MPs stated that Greece “is now implementing policies fundamentally at odds with international conventions”\(^{38}\) and internationally, the latter mainly focused on the criminalisation of NGOs and “their human rights monitoring capacities in the Aegean.”\(^{39}\)

**Response to developments in Afghanistan**

Greece’s response to developments in Afghanistan still reflects the broader EU policy on containment and deterrence and is consistently stressed by the Greek Government. Prime Minister Mitsotakis said Europe has stated that “we will not tolerate, we will not accept the uncontrolled migratory waves that we had to deal with in 2015”\(^{40}\), while MoMA’s head declared that Greece is “no more a gateway to the European continent”\(^{41}\). Deputy Integration Minister Voultepsi stated in Parliament that “the country will not receive any more irregular arrivals”.\(^{42}\) According to media reports, Greece is preparing to prevent the arrival of one million Afghan asylum seekers who are currently in Turkey\(^{43}\).

Worryingly, other European governments and politicians openly support Greece’s stance, a tacit encouragement of their harsh border measures, including illegal pushbacks. Austrian Minister responsible for European Affairs and the Constitution, Karoline Edtstadler, after a meeting with Greek Government, stated that “We believe that Greece is a guarantor of the borders of the European Union”\(^{44}\). French Minister of Interior, Gerald Darmanin, said that “the Greek authorities were «completely effective» in fighting illegal migration, and protect all of Europe by protecting their own borders”\(^{45}\).

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\(^{34}\) Press release of 7 October 2021, available at [https://bit.ly/3mQNEuE](https://bit.ly/3mQNEuE) in English


\(^{36}\) I. 4825/2021, OGG issue Α’ no 157


\(^{40}\) E-Kathimerini, Mitsotakis: No intention ‘to enter into arms race’ with Turkey, 30 September 2021 available at: [https://bit.ly/3upYATU](https://bit.ly/3upYATU)


\(^{43}\) Dimitris Giannakopoulos, Parapolitika newspaper, The government’s three actions to stem the wave of one million migrants (in Greek), 13 October 2021, available at: [https://bit.ly/3nd9gBH](https://bit.ly/3nd9gBH)


Separately, in the Extraordinary Meeting of G20 Leaders on Afghanistan held virtually on 12 October, Turkish President Recep Tayyip Erdogan stated that Turkey wouldn’t allow a new influx of refugees from Afghanistan that would affect both Turkey and the European countries.\textsuperscript{46,47}

NGO’s in Greece have consistently raised concerns that current preparations for managing the potential consequences of the crisis in Afghanistan appear to be exclusively focused on deterrence mechanisms and have urged the Greek government “to review the Joint Ministerial Decision with respect to the citizens of Afghanistan, as well as with respect to the citizen of other nationalities”\textsuperscript{48}.

On a positive note, President of the Republic Sakellaropoulou symbolically hosted at the Presidential Mansion nearly forty women from Afghanistan, MPs, lawyers, and judges, who fled their country and are now awaiting relocation from Greece mostly to the UK, US and Canada\textsuperscript{49}.

\begin{quote}
“Here in Samos I haven’t gone to school since we arrived in 2019. In the old camp, there were about 8,000 people and the conditions were really bad. You could not sleep, you could not live normally, there was a lot of pressure, you could not survive. How could you think about school? Impossible.

I’m 16 years old and now and in the new camp I sit in our container or I go to bring food for the family, I walk around, I don’t do anything particular.

The living conditions in the new camp are much better, the containers are new, better and easier to clean than a tent. Also, there are playgrounds, either for the children to go or for the adults to take a walk. On the other hand, there are some negatives as well, for example the food is not good at all, and sometimes I cannot even eat it. Also, you need to pay 3.20 euros for the bus per person every time you need to go to town to buy something, and that is a lot of money for people to come and go.

Another thing that makes me feel bad is the strict control of exit-entrance in the camp. You have to wait a lot. And it looks ugly to have your bag opened in front of everybody and let the others see what you have bought from the town, what you have in the bag and what not. Now that we are recognized refugees, what I would suggest to the authorities is to improve the process so that it doesn’t take so long for people to get their papers.”

*Ammar, 16 years old boy from Syria, currently living in Samos Closed Controlled Access Centre
\end{quote}

\textsuperscript{46} ANA-MPA Press, 12 October 2021 https://bit.ly/3Cljsq
\textsuperscript{49} ANA-MPA Press, President Sakellaropoulou receives women judges, lawyers and MPs from Afghanistan, 12 October 2021, available at: https://bit.ly/3jaF772, see also Kathimerini Newspaper, We do not abandon any woman is the message of the President of the Republic (in Greek), 13 October 2021, available at: https://bit.ly/3AXC9X2
European Developments

Update on Relocation

For the time being, there is no news on expanding the voluntary relocation scheme for unaccompanied and separated children (UASC) that is to be concluded at the end of October. At the moment, efforts by the Special Secretary for the Protection of Unaccompanied Minors are centred in relocating 549 UASC in the few remaining weeks. In the most recent statistics published by International Organization for Migration (IOM), a total of 1,047 UASC - of the 1,600 target - have been relocated since 2020. Amongst those relocated 93% were boys and 7% girls, with Germany and France the Member States that welcome most of these children, followed by Portugal and Finland.

Also, as part of the Voluntary Scheme for the Relocation, 3,416 members of vulnerable families with children, beneficiaries and applicants of international protection have been relocated since 2020, mostly to Germany and France. Especially regarding vulnerable families’ relocation, GCR often receives complaints by beneficiaries regarding difficulties in finding information on access to the relocation procedure and its preconditions. The majority of those relocated are of Afghan origin (56%), followed by Syrians (24%).

A late September statement by the European Network of Ombudspersons for Children (ENOC) took a firm stance against EU MS policies, laws and practises that harm children’s rights, especially in the context of migration. Among the 12 recommendations towards EU MS are that:

- Children, whether unaccompanied, accompanied or separated, should never be refused entry to a country in accordance with the non-refoulement obligations,
- All children should be guaranteed unobstructed access to a child friendly, age-appropriate asylum procedure and reception conditions and
- The establishment of a long-term stable and sustainable allocation mechanism for accompanied, unaccompanied and separated minors across all EU Member States should be examined in the light of the reform of Dublin III Regulation and the new EU Pact on Migration and Asylum.

UNACCOMPANIED AND SEPARATED CHILDREN

As of 15 October, 2,159 unaccompanied and separated children (UASC) are estimated to be in Greece of which almost 92% are boys, 8% are girls and 9,1% children are below the age of 14 years old. The top nationality of the UASC in Greece is Afghanistan (29%), followed by Pakistan (23%) and Syria (12%), while 36% of the children come from other countries.

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50 Protagon e-newspaper, More than 1,000 unaccompanied children who relocated to other countries (in Greek), 28 October 2021 available at: https://bit.ly/3pIaADT
51 IOM, Voluntary Scheme for the relocation from Greece to other EU countries, 19 October 2021, available at: https://greece.iom.int/sites/greece/files/211019.pdf
52 Ibid.
53 Ibid.
54 Information provided by GCR field lawyers in Thessaloniki. PoCs characterize the relocation procedure as “blurred”
55 Ibid.
Accommodation facilities for unaccompanied and separated children:

<table>
<thead>
<tr>
<th># of UASC in long-term accommodation (Shelter/SIL)</th>
<th># of UASC in Relocation Hubs</th>
<th># of UASC in “Safe Zones”</th>
<th># of UASC in RICs</th>
<th># of UASC in Open temporary accommodation facilities (camps)</th>
<th># of UASC in protective custody/detention</th>
</tr>
</thead>
<tbody>
<tr>
<td>1,747 (1,484 in Shelter / 263 in SIL)</td>
<td>76</td>
<td>238</td>
<td>68</td>
<td>30</td>
<td>1259</td>
</tr>
</tbody>
</table>

In a positive development, no children are reported to be in protective custody/detention, according to the latest government statistics, although GCR identified 12 unaccompanied children in detention 2 weeks later. No children are reported to be living in precarious housing conditions.

The hotels for UASCs and safe zones previously run by IOM are finally closing. A new shelter for homeless children will be opened in Athens, run by METAdrasi, will have capacity for 60 children to stay for 3 months until they are placed in a long-term shelter for children.

A newspaper reports that the government plans to abolish the Special Secretariat for Unaccompanied Minors, just 18 months after its establishment and that the SSPUAM is moving to another ministry. The responsibility for UASC will reportedly be transferred to the general directorate of the Migration and Asylum Ministry under Deputy Minister Sofia Voultepsi.

Unaccompanied children again left without guardians

Since 1 September, unaccompanied children have once again been left without representation as the interim guardianship project implemented by METAdrasi came to an end and the official state system is not yet operational after three years of its provision. The lack of a sustainable guardianship system is creating dire protection gaps for children on the move, especially regarding age assessments, access to asylum, family reunification procedures, education and other services or to have their best interests properly assessed.

At the same time, a new cooperation between the Ministry of Labour and the Hellenic Chamber of Hotels was announced, according to which 16-year-old children living in childcare facilities, unaccompanied children included, can work in hotels under unspecified safeguards. The policy raises concerns over who will act as carers for working unaccompanied children.

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58 based on EKKA statistics, ibid.
59 EKKA statistics of 15 October 2021 do not refer to children in detention. Information provided to GCR by its field lawyers in Athens and Thessaloniki, concerning the situation on 28 October 2021 only in Amygdaleza (10 UASCs) and Thessaloniki area (2 UASCs).
60 The last hotel closed on 7 September 2021, while some safe zones’ closures are pending - information provided by IOM at North Greece Child Protection Working Group on 09 September 2021
61 E-Efimerida, Jeffrey Pyatt in the first dormitory for homeless minors in Athens - "I have great respect for what you do" (in Greek), 29 September 2021, available at: [Link](https://bit.ly/30Knana)
63 with law 4554/2018
64 Specific problems were reported by UNHCR in Lesvos and in Samos regarding the representation of children during the asylum procedure, information provided at the Athens Child Protection Working Group on 23 September 2021
65 Foteini Lampridi, Tvxs e-newspaper, Minor refugee children working in hotels in a country without a guardianship system (in Greek), 17 September 2021 available at: [Link](https://bit.ly/3aXlNyq)
and ensure they are not exploited, as the temporary guardianship bestowed upon Public Prosecutors in practice leaves no room for the establishment of a personal relationship with the child.

**Access to Education for refugee and asylum-seeking children**

So far, the current school year is marked by improvements on the previous one, during which the majority of refugee and asylum-seeking children were excluded from education. However, two weeks after the start of the school year, children in 16 sites did not attend school and other issues are still being reported:

- **In Epirus**, there are issues of transportation as the camps (Agia Eleni, Filippiada) are far away from the schools and Refugee Education Coordinators (RECs) had not yet been appointed by 4 October.

- **In Central Macedonia**, low enrolment rates are recorded in Nea Kavala and nearby area of Kilkis, Axioupoli, Polikastro. Five Parents’ association from the area published a letter, articulating concerns about the inclusion of refugee students in regular schools. In addition, as of 27 September no transportation for the primaries had been arranged and DYEP teachers had not been appointed. In Veroia, camp manager didn’t allow children to exit the camp to go to school due to a COVID-19 cases rise although schools were open and local students attended school, an issue resolved by 27 September. In Kleidi camp a REC had not yet been placed on 27 September.

- **In Attica**, especially in Inofita, Andrávída, Malakasa and Nea Malakasa, not enough school teachers have been hired, half of the primary school children have no access to escorts / transport, lack of places for the secondary education students, school vaccinations delays.

- **On the islands**, especially in Samos, children from the camp have enrolled in ZEP classes but are not attending yet. As of 4 October there’s no free transportation provided for children between the new camp and the town of Vathy. In Lesvos, as of 7 October, a space was sought after until construction of “education area” is completed. In Kos and Leros refugee students are waiting for teachers and in Leros a REC was appointed only on 16 October.

**RECOMMENDATIONS**

The European Union and its Member States should:

- Urgently issue new guidance for Afghans at risk, recognizing the dramatic change in the situation in Afghanistan, particularly for women, girls and LGBTQ children and adults.

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67 For more detailed information on this issue, please see Greek Council for Refugees/Save the Children International Back to School? Refugee children in Greece denied right to education, 15 September 2021, available at: [https://bit.ly/3aXDjQa](https://bit.ly/3aXDjQa)
68 Information provided at the Education Task Force meeting on 07 October 2021, updated up until 27 September 2021
69 Information shared at the Child Rights Advocacy Network (CRAN) meeting of 04 October 2021
71 Information shared at the North Greece Education SubWorking Group of 22 September 2021 and updated on 04 October 2021
72 Information provided at the Education Task Force meeting on 07 October 2021
73 Information shared at the Child Rights Advocacy Network meeting of 04 October 2021
74 Information provided at the Education Task Force meeting on 07 October 2021
75 Information shared at the Child Rights Advocacy Network meeting of 04 October 2021, transportation is available even for students upon payment of a €1,60 one-way ticket
• Raise concerns about the Joint Ministerial Decision to designate Turkey a “safe third country” for refugees from Afghanistan, Syria, Somalia, Bangladesh and Pakistan, and call on the Greek government to revoke the decision

• Support contingency planning and preparedness for a humanitarian response in the event of an increase in arrivals from Afghanistan, with specific attention on the possibility of an increase in unaccompanied and separated children

• Continue relocations, with pledges by individual states coordinated and structured through an extended EU scheme, until a permanent relocation mechanism as proposed in the new EU Pact on Migration and Asylum is established

• Ensure that commitments included in the EU Strategy on the Rights of the Child are reflected and embedded in the final version of the files included in the EU Pact on Migration and Asylum.

**The Greek Government should:**

• Revoke the Joint Ministerial Decision of June 2021 on Turkey as “safe third country” for refugees

• Immediately exclude UASC and vulnerable families from the scope of the JMD and examine their claims on their merits

• Urgently address the disruption to the distribution of cash assistance and halt of catering services to ensure that all beneficiaries and vulnerable individuals receive assistance in a timely manner

• Put in place an efficient and sustainable guardianship system not only at the borders of Greece but all over the country and make sure that the best interest of any child is of top priority, regardless its nationality or legal status

• Ensure unimpeded access to quality education to children of all ages and nationalities, in line with Articles 28 and 29 of the International Convention on the Rights of the Child, regardless their legal status.

• Further engage in dialogue with other EU MS and the EU Commission in order to put in place a stable, long-lasting and sustainable relocation system of children, both unaccompanied and accompanied by vulnerable family members

• Make sure that respect to human dignity within its open or controlled access sites is a non-negotiable aspect of the life of the asylum-seeking population in Greece in accordance with the Reception Conditions EU law

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This paper was written by Agapi Chouzouraki and edited by Daniel Gorevan.

Cover Photo by Omar O., Samos, October 2021

* The names of the child and the young woman have been changed for protection reasons.