

CONTROL AND CONTAINMENT

CHANGES IN ACCESS TO ASYLUM ON MAINLAND GREECE, CRETE AND RHODES

January 2022



MOBILE
INFO TEAM

Mobile Info Team is a Greece-based organisation that provides advice and assistance throughout all stages of the asylum procedure. We raise awareness and advocate for changes to the asylum system in Greece, and work to end pushbacks as part of the Border Violence Monitoring Network.

We would like to thank all of our interview participants for their time and invaluable insight.

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INTRODUCTION

At the end of November 2021, the Greek Government announced major changes in access to asylum for people seeking safety on mainland Greece, Crete and Rhodes. This policy saw the termination of the Skype system and for the registration of first instance asylum claims. Instead, people seeking safety will now need to go to two reception centres on the mainland of Greece. However, such centres are not yet operational, meaning that there has been no access to asylum for the majority of people on mainland Greece, Crete and Rhodes since 22 November 2021.

Temporarily blocking access to asylum not only leaves people in need of protection at risk, undocumented and destitute, it also violates national and international law. Even when such reception centres are opened, this policy will force people into de facto detention under prison-like conditions. Closed reception centres with policies of indiscriminate detention for men, women and children stand in contrast to any notion of protection, negatively impacting people's mental health, autonomy, liberty and ability to rebuild their lives.

An increasing number of people have been entering Greece via the mainland over the past six years with 2021 being the first year that more people entered Greece via the mainland than the sea (53%). Our projected impact analysis forecasts that Greece would need to register between 30,160 and 44,000 people annually on the mainland alone. This policy change will therefore undoubtedly have a significant impact on the lives of tens of thousands of people seeking safety in Europe.



ACCESS TO ASYLUM BEFORE 22 NOVEMBER 2021



Until 22 November 2021 the majority of registrations of asylum applications on mainland Greece and the islands of Crete and Rhodes took place at Regional Asylum Offices or Asylum Units. The majority of people within this geographical scope were subject to a two-stage registration process¹, first needing to connect with the Greek Asylum Service on Skype before appearing in person at a Regional Asylum Office or Asylum Unit.

Since the implementation of the Skype pre-registration system in July 2014², people speaking one of the 18 languages available³ had to express their willingness to apply for asylum to the Greek Asylum Service via the telecommunications app, Skype. Only after this call, which presupposed access to a smartphone with a working camera, access to Wi-Fi or money for data, strong signal and the technical knowledge to download, install and use the app, were people able to appear in person and formally lodge their asylum claim at a

Regional Asylum Office or Unit. The Skype system was immensely flawed, with delays of up to 14⁴ months which needlessly forced people to remain undocumented and destitute for prolonged periods.



People who spoke a language other than the 18 available on Skype had to turn up at their nearest Regional Asylum Office and attempt to register their claim in person. In practice, very few people were admitted to Regional Asylum Offices without an appointment. People's only option was to spend many hours on multiple days queuing outside of these offices in hopes of there being a registration slot and being admitted at the discretion of Asylum Service staff. It was also possible to send an email requesting an in person registration appointment, yet unless the applicant was considered vulnerable by law and could evidence this, or the email was sent by a lawyer, these emails largely went unanswered. Additionally, over the past year access to Regional Asylum Offices has been severely limited, due in part to Covid-19 restrictions.

The Greek state was failing to ensure people seeking safety had unhindered access to asylum on the mainland, as well as the islands of Crete and Rhodes, with the Skype system being the most persistent yet hidden obstacle. Despite rectifiable problems, the Skype system had benefits and could have added value to the asylum system in Greece. Most notably, Skype provided a remote medium through which to pre-register an asylum claim without depriving people of their liberty. Feedback from civil society during a previous research study⁵ saw this as the key advantage of the system, with 89% of people in agreement⁶.

A system which enables people to live within their new communities also has long-term benefits for both Greek citizens and people seeking asylum as it provides better opportunities for integration. The new asylum procedure will take this opportunity away, forcing people into closed centres without any possibility of integration.



ACCESS TO ASYLUM AFTER 22 NOVEMBER 2021



On 22 November a Circular⁷ from the Secretary General of Immigration Policy of the Ministry of Migration and Asylum, Patroklos Georgiadis, was released announcing a major overhaul of the procedure to access asylum in Greece. It stated that if someone had entered Greece 'illegally' and could not prove their identity and nationality through a document from a Greek authority, the person would now need to undergo pre-registration at one of six Reception and Identification Centres, only one of which is situated on the mainland, in the Evros region.

This policy change caused outrage amongst local residents and MPs of the left-wing political party, Syriza, as it implied that people who arrive at any point in Greece could be transferred to Reception and Identification Centres on Samos, Lesbos, Leros and Kos, in stark contradiction to promises⁹ of lowering the number of people seeking asylum on these islands. On 24th November Syriza MPs issued a joint statement¹⁰ declaring the policy

**“The decongestion of
our islands is our
number one priority”**

**- Notis Mitarachi, Minister of
Migration and Asylum⁸**

announcement outrageous and a mockery of local residents, whilst also raising concerns of the inhuman treatment of those seeking safety who are forced into reception centres.

Just hours after this statement was released, the Circular by the Ministry of Migration and Asylum was re-issued¹¹ with major retractions and substantial omissions of vital policy details. This Circular was accompanied by a Clarification from the Commander of the Asylum Service, Marios Kaleas¹².

Combined, these instructions confirmed that all persons entering Greece or already residing in Greece without documentation who can not prove their identity and nationality through a document from a Greek authority would be subject to reception and identification procedures as outlined in Article 39 of the International Protection Act¹³. Significantly, the re-issued Circular redefined that the entry point of a person would indicate which Reception and Identification Centre they would be processed in, with only those who arrive via the Aegean sea being processed on the islands. This backtrack in policy meant that access to the asylum procedure on the islands will now largely be unchanged.

This policy will, however, have major implications on the mainland of Greece. The re-issued Circular and Clarification detailed that all persons residing on the mainland who are yet to be registered, as well as all new arrivals to the mainland, will undergo reception and identification procedures, expressly stating that the Skype pre-registration system will no longer be the procedure for first instance applications.

This announcement also cites the use of Article 39 (4) of the International Protection Act¹⁴, which outlines the de facto detention of people seeking asylum for the purpose of registering an asylum claim.

Despite people theoretically being able to register an asylum claim at Fylakio Reception and Identification centre - the only centre on mainland Greece situated close to Turkey - in practice this is not a safe or viable option. Fylakio Reception and Identification Centre has room for just 282 people and is often full or overcrowded¹⁵. The inability of this facility to deal with the registration of a small number of people seeking asylum means that people are often sent directly to the nearby pre-removal detention centre instead of the reception centre¹⁶. The facility simply does not have the capacity to register an increased number of asylum claims. Furthermore, in order to travel on trains or coaches people need documentation proving their legal right to be in Greece, which those who have not yet registered an asylum claim do not have. Additionally, not all people enter Greece via the Evros border. For people who arrive to islands outside of the Aegean sea, for example on Crete which is in the Mediterranean, the journey to Fylakio would be more than 1,300 km¹⁷.

The majority of people who are registered in Fylakio Reception and Identification Centre have been taken there after apprehension by the police, and many face criminal charges¹⁸ for 'illegally' entering through the land border. A lack of information on the procedure and the threat





of unjust deportation cause many people seeking asylum in Greece to be fearful of police and detention as they are unaware of how long they will be held, what their rights are and if they will be granted access to the asylum procedure.

People who enter Greece often know that there is a possibility they will be pushed back to Turkey, having either been pushed back previously themselves, or due to knowledge of the high numbers of pushbacks that occur. In 2020, the Border Violence Monitoring Network documented 88 pushbacks of an estimated 4,739 people¹⁹. These testimonies evidence that although apprehensions that lead to pushbacks do take place from locations deep within the interior of Greece, most apprehensions take place near the border areas²⁰.

Due to the high number of pushbacks, which involve severe ill-treatment and violence²¹, and cause people to be returned to Turkey without due process, it is simply not safe for people seeking asylum to voluntarily return to border areas in order to register their asylum claims.

Of grave concern is the considerable lack of detail within this policy. Instead of naming sites wherein people who are already residing in Greece can go and register their asylum claims, the policy simply states that this will happen at “designated points”²² throughout the country. It has since been confirmed by the Commander of the Asylum Service that the two key sites which will be used for the registration of asylum claims on the mainland are yet to be decided but that there will be one facility in the North of the country and one in the South²³.

To implement this policy pre-existing facilities, such as refugee camps, will either need repurposing into Reception and Identification facilities or there will need to be construction of new reception centres. The Ministry has not announced that it is pursuing either of these options²⁴, causing additional concern as to when access to asylum will again be possible on mainland Greece.

In practice, there has been no access to asylum for the majority of people on mainland Greece since 22 November 2021.

July 2014 -
Nov 22 2021

The Skype pre-registration system is the point of access to the asylum process for the majority of people on mainland Greece, Crete and Rhodes with in-person registration taking place at Regional Asylum Office's and Asylum Units throughout the country²⁵.

Nov 22 2021

A Circular and Clarification are issued by Secretary General of Immigration Policy, Patroklos Georgiadis and Marios Kaleas, stating that the Reception and Identification Centers of Samos, Chios, Lesvos, Leros, Kos and Orestiada will now be used to register asylum claims.²⁶

Nov 24 2021

Syriza MPs publish a joint statement condemning the policy change, referring to the "vulgar and blatant mockery of local residents" who had been promised decongestion of the Reception and Identification Centres that would now be the sole entry points to asylum in Greece²⁷.

Nov 24 2021

A Clarification is issued by the Commander of the Asylum Service, Marios Kaleas, stating that the Skype system will no longer be used for first instance applications but will continue to be used for subsequent applications²⁸.

Nov 24 2021

A new Circular is rushed out which states that only those who enter Greece via the Aegean sea will be transferred to RICs on the islands. All those who enter via the mainland will be registered in undisclosed "designated spots" on the mainland²⁹.

Dec 1 2021

Marios Kaleas states that changes in the registration of asylum applications is necessary for purposes of "control" and confirms there will be two sites on mainland Greece for the registration of asylum applications, one in the north and one in the south but that the location of these sites is yet to be decided³⁰.

IMPACT

People seeking safety in Greece have no protection or support until they register their asylum claim. When people are forced to remain undocumented, despite their continued efforts to register their claims, they are deprived of all access to the health care system, labour market, accommodation and all social services - despite these being legal entitlements for people seeking asylum throughout Europe.

It is only after the registration of an asylum application that people are entitled to an Asylum Seeker Card which gives them documentation to prove the legal basis for their stay in Greece. After registration people are also granted a PAAYPA (provisional insurance and health care number) giving them access to the healthcare system, can apply for basic assistance of between €2.76 and €4.93 a day (depending on household size), accommodation and after six months are permitted to work³¹.

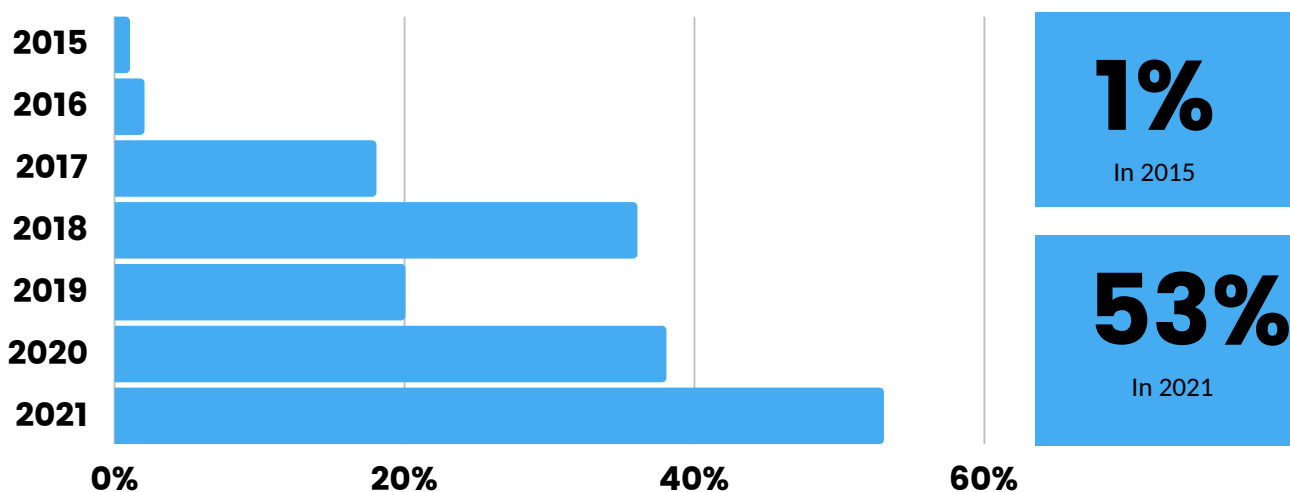
The homelessness rate of people trying to access asylum on the mainland is at least 74 times the national rate of Greece³². The actual number is likely to be much higher, as this figure includes only those physically living on the streets, whereas definitions of homelessness also include not having a stable home, which arguably accounts for the vast majority of people needing to register an asylum claim. Left without a safety net, people seeking asylum in Greece are forced to sleep on the streets, despite having suffered severe loss and trauma.



NUMBERS

Since 2015 there has been a steady increase in the number of people arriving to Greece via land borders. In 2015 just 1% of people arrived via the land. This rose to 18% in 2017 and up to 38% in 2020. 2021 was the first year that more people arrived to Greece via land routes than via the sea, with 53% of new arrivals reaching Greece via the mainland³³. This continuous upward trajectory of land arrivals over the past six years would suggest that Greece can expect the majority of people seeking asylum to arrive via the mainland in the future. Fair and efficient access to the asylum system on the mainland must therefore be an urgent priority for the Ministry of Migration and Asylum.

% of arrivals via land per year



Using the methodology set out in Appendix A, we estimate that between 30,160 people and 44,000 people seeking asylum would potentially need to register their asylum claims on the mainland annually. In order to cater to this many people, the two Reception and Identification Centres on the mainland would each need to have a capacity for at least 1,833 people. These centres would each need to be more than six times the size of Fylakio Reception and Identification Centre³⁴, which has capacity for just 282 people, or near to the size of the Reception and Identification Centre on Kos, which is on a site covering 90 acres³⁵.

Lower estimate
30,160
people

Upper estimate
44,000
people

NO ACCESS TO ASYLUM

It is not the first time that the Greek government has blocked people from entering the asylum system. On 2 March 2020, an emergency legislative decree³⁶ was adopted that temporarily blocked access to the asylum procedure for people who entered Greece 'illegally' from 1 March 2020. This measure, as part of a response to disagreements with Turkey, was in place for one month. Yet, the asylum procedure did not reopen until 15 May 2020 with the stated justification being Covid-19.

This ill-defined policy began gravely impacting people from the day it was implemented on 22 November 2021. People who were previously eligible for the Skype procedure but had not managed to get a registration appointment before the system changed, may have already been trying to access the asylum system for many months or even years³⁷. Our previous study found that on average people were calling the Greek Asylum Service for more than 14 months before successfully pre-registering. 28% of the people we spoke to were still trying to connect to the Greek Asylum Service after two years.

For those who have found themselves caught between the two systems, this policy change has caused unfair and unjustifiable delays in entering the asylum system.





Despite there currently being no alternative routes to register an asylum claim, people who have connected with the Greek Asylum Service on Skype since the implementation of this policy

change have been denied the opportunity to enter the asylum system without viable explanations or alternatives.

DAAMIR'S STORY

Daamir managed to reach the Greek Asylum Service on Skype, just a day after the system had changed.

“They told me that there was a new law and that Skype was no longer for me - I didn't really understand what was going on.

They told me that the Greek Asylum Service is changing the law and that I could not get an appointment.

They said it would be easier for me to register in the future but that I must wait.”

Daamir was left feeling scared and confused. Having fled persecution, he hoped that Greece would offer him a safe haven to rebuild his life. Instead, Daamir was denied his right to apply for asylum and offered no advice or support on what to do next.

Without documentation proving his legal right to remain in Greece whilst he claims asylum, Daamir is too scared to stay in a city as he fears he will be apprehended by the police and detained or pushed back to Turkey.

People who had in-person registration appointments after the 29th November have had their appointments cancelled without explanation or any information on what they should do next.

RAHIM'S STORY

Rahim arrived in Greece in November 2019. He was told how to apply for asylum via Skype and began trying to call immediately.

“The first thing I did was to call on Skype to make an appointment. I kept calling on Skype - for months and months I tried to call. Then I went to a private lawyer to register my appointment.”

Rahim called the Greek Asylum Service on Skype every week for nearly two years to no avail. Eventually Rahim resorted to paying a private lawyer to help him register his asylum claim. Rahim’s lawyer managed to get him an in-person registration appointment for the 29th November.

Just days before Rahim’s registration appointment he received a call from the Greek Asylum Service. They told Rahim that his registration appointment had been cancelled.

“On the 29th of November, when it was meant to be my registration day, I went to the [Regional] Asylum Office.

They told me, “We cancelled your appointment, why did you come today?” I told them that I wanted to know the reason why it was cancelled.

They told me it was because there were no interpreters available.”

Rahim tried to reason with the Asylum Service staff and offered to register his claim in Greek as he is a fluent speaker. The Asylum Service staff then allowed Rahim to enter the building and

asked him to translate for them as there were Arabic speakers waiting inside. Once Rahim had finished translating for them, the Asylum Service staff asked the security guard to escort Rahim outside.

Again, Rahim requested to know the reason his appointment was cancelled and what he should do instead, but his questions went unanswered.

“I know the reason they gave me was a silly reason but they didn’t tell me anything else. Once I was finished translating they just asked me to leave.”

Rahim has spent the past two years trying to claim asylum in Greece. He has been forced to live in constant fear of being stopped by the police.

“Without paperwork you have nothing, you are helpless.”

Since 22nd November we have been contacted by numerous individuals and families who wish to claim asylum in Greece. These include a destitute family of four with two children under the age of three who are forced to sleep on the streets of Athens despite the wife being pregnant and needing medical assistance; a young man sleeping on the streets of Thessaloniki who is unable to get surgery for his broken leg; and a family of four who are severely traumatised from the father’s torture in Afghanistan and their treacherous journey to seek safety in Europe.

CONTROL & CONTAINMENT

The implementation of Article 39 of the International Protection Act³⁹ will see the de facto detention of people seeking asylum for 25 days. Forcing people into prison-like centres for the purpose of registering an asylum claim is unjust and unnecessary. Fylakio Reception and Identification Centre is the only existing facility of its kind on the mainland with space for just 282 individuals, although up to 350 individuals have been known to be housed within the facility⁴⁰.

The centre is surrounded by barbed wire and guarded by police causing it to resemble a prison. People are automatically detained within the site and are subject to a 'restriction of their freedom' for a maximum of 25 days, according to the law⁴¹, for the purpose of registering their asylum application. The conditions within the facility are of serious concern, especially with regard to the lack of reception and identification services such as interpreters and medical care⁴². There have also been numerous allegations of police intimidation within the centre⁴³. Given the poor conditions of already existing Reception and Identification Centres and the use of indiscriminate detention, this new policy raises serious concerns around both people's liberty and dignity.

This sudden policy, which the Commander of the Asylum Service, Marios Kaleas, confirmed was for the purpose of control⁴⁴, is in line with worrying developments across Greece aimed at controlling and containing the refugee population. This year, Greece has seen policy changes aimed at driving people seeking asylum into facilities where they can be more easily monitored. In October the Ministry of Migration and Asylum took over the provision of EU-funded financial aid to asylum seekers from UNHCR⁴⁵. As part of new rules that took effect on 1 July 2021, people seeking asylum who have managed to secure accommodation

"For purposes of control, of having a full picture of who is here and for national security and public order reasons, they have to be traced."

- Marios Kaleas, Commander of the Asylum Service³⁸

independently are no longer afforded financial assistance from the government⁴⁶. In practice this policy forces people to uproot their lives and move into camps or other facilities overseen by the Ministry which are largely located outside of towns and cities, severely impacting both their autonomy and their ability to integrate into their new societies.

In addition, there have been developments in the fortification of camps across the country, with the construction of concrete walls or chain-linked fences around camps, updated surveillance technology and biometric entry and exit features.⁴⁷ The new 'closed controlled centre' (KEDN) of Samos is equipped with such features, including 'double barbed wire metal fencing, CCTV throughout, and the 24/7 presence of patrolling police officers and privately contracted security officers'⁴⁸. This camp is a harsh example of how people's movements are being severely restricted. People are only allowed in and out of the camp within certain time periods, are subject to security checks and, since 17 November 2021, those without valid government-issued IDs have been illegally detained, in violation of their right to liberty⁴⁹.

It is deeply concerning that these policies are less about fair and efficient access to the asylum procedure and more about the control and containment of men, women and children who seek safety in Greece.

Despite changes to the asylum procedure having been in place since 22 November 2021, the Ministry of Migration and Asylum is yet to make any announcement detailing how people should now claim asylum. People seeking asylum who have been in contact with Mobile Info Team have described a severe lack of information provided to them by the Asylum Service both via Skype and in person at Regional Asylum Offices. The Ministry is also yet to update its website which still references in-person registration at Regional Asylum Offices⁵⁰ and gives details of the Skype system without clarification that this is now only to be used by people making subsequent applications⁵¹.

A lack of information, misinformation and an ever-changing system in Greece has caused pervasive issues and delays for many people trying to claim asylum. Up to one in six people in need of international protection do not know how to access the asylum procedure.⁵² In addition, 84% of people found out about the Skype procedure from other people within the refugee community, and only 4% found out about the Skype procedure from the State. Incomplete information provided by the State causes people to look elsewhere for a thorough understanding of the asylum process and how to lodge their claim. However, these sources are not verified or may be outdated leading to further misinformation and confusion.

CONCLUSION

The abrupt change in policy has left people in an information void. There are currently no details available on how and when individuals can enter the asylum system. It is deeply concerning that the Greek authorities are denying people access to the asylum system without offering any interim measures or information on how and when people can expect to register their asylum claims.

Policies of exclusion and detention are detrimental to both people seeking asylum and to Greece. For people seeking asylum, these policies impede people's ability to rebuild their lives, negatively impact people's mental health and take away people's autonomy and liberty. De facto detention also limits people's ability to access essential services, such as healthcare and education. For Greece these policies are also detrimental as they force people seeking asylum to stay reliant on the State for extended periods and prevent people seeking asylum from integrating and giving back to their new societies.

RECOMMENDATIONS

The Greek state should urgently:

- Provide interim measures to ensure people have viable options to register asylum applications on mainland Greece, Crete and Rhodes
- Find alternative long-term solutions to register asylum applications without detaining individuals

APPENDIX A

Methodology 1 (Upper estimate)

This figure uses data from UNHCR on yearly arrivals to Greece over a five year period from 2016 to 2020. We calculated a yearly average of arrivals by totalling the number of arrivals for this period (354,361) and then subtracted 3% (10,631) to account for subsequent applications (See Methodology 2 for an explanation) giving a yearly average of 68,746 first instance applications. We then assumed that the percentage of arrivals would continue to increase in line with the upwards trajectory from the past five years. Seeing as there were 39% more land arrivals from the years 2020 to 2021 we assume that the percentage of land arrivals will increase again by just half of this from 53% to 64%. This gives us the figure 43,997, which we rounded to the nearest 10. **44,000 people seeking asylum may need to register on the mainland annually.**

Methodology 2 (Lower estimate)

This figure was achieved by using data from Asylum in Europe Database country reports which is based on official Ministry of Migration and Asylum. We calculated a yearly average of asylum applications by totalling the number asylum applications over a five year period from 2016 to 2020 (284,557) minus the number of subsequent applications for this period (10,010 which is 3%) giving a yearly average of 56,911 first instance asylum applications. We then assumed that Greece will continue to see 53% of new arrivals via the mainland. This gives us the figure of 30,163, which we rounded to the nearest 10. **30, 160 people seeking asylum may need to register on the mainland annually.**

Size of new Reception and Identification Centres

Article 39 of the IPA outlines a maximum detention period of 25 days for the purpose of registering an asylum application. The two Reception and Identification Centres on the mainland would need to have a capacity for at least 1,833 people. This has been worked out supposing an equal number of people seeking asylum would enter Greece each month. If Greece was to see 44,000 arrivals annually who each took a month to register their asylum claim there would need to be 3,666 spaces available per month. This is simply a projection to give an idea of the potential capacity needed as the number of arrivals is not consistent throughout the year. The Reception and Identification Centre in Kos is on a site alongside a pre-removal detention centre, combined they have capacity for 2,140 residents.

Explanation on the use of these methodologies

From January to November 2021⁵³, the Greek Ministry of Migration and Asylum recorded 14,465 pre-registrations on the mainland . The numbers of pre-registrations, however, have been low for the last two years due to the Covid-19 pandemic. It is highly likely that the number of pre-registrations will again increase if Covid-19 becomes endemic, especially taking into account the worsening situation in Afghanistan, the impact of which has not yet reached Europe.

END NOTES

1 People who can prove their vulnerability according to law should still have access to the asylum system via referral pathways

2 See Asylum Information Database country report for Greece 2015, p.14, available at: <https://bit.ly/3FeVxRO>

3 See Lives on Hold report, 2021, a timeline of the development of the Skype system and the languages added, p.11, available at: <https://bit.ly/3zJ6hGU>

4 See Lives on Hold report, 2021, p. 13, available at: <https://bit.ly/3zJ6hGU>

5 See Lives on Hold report, 2021, p. 4, available at: <https://bit.ly/3zJ6hGU>

6 See Lives on Hold report, 2021, p. 12, available at: <https://bit.ly/3zJ6hGU>

7 See 'Μόνο σε νησιά και Έβρο τα νέα αιτήματα ασύλου' on Efsyn.gr, available in Greek at: <https://bit.ly/3ncdQks>

8 See 'Under-pressure Greece toughens migration stance' on France24.com, available at: <https://bit.ly/34FH04Z>

9 Ibid.

10 See 'Η κυβέρνηση Μητσοτάκη επισφραγίζει την καταδίκη των νησιών και του Έβρου' on syriza.gr, available at: <https://bit.ly/3HUYwAA>

11 See 'Διαδικασία Υποβολής Αιτημάτων Ασύλου-Νέα Εγκύκλιος Υπουργείου μετά τις αντιδράσεις' on chionews.com, available at: <https://bit.ly/3nBu0UL>

12 See migration.gov.gr, see Διαδικασία Υποβολής Αιτημάτων Ασύλου, available at: <https://bit.ly/3zMvyjg>

13 See Article 39 of Hellenic Republic Law No. 4636/2019

14 See Article 39(4) of Hellenic Republic Law No. 4636/2019

15 See 'Reception and identification procedure, Greece' on asylumineurope.org, available at: <https://bit.ly/3HOYCco>

16 Ibid.

17 See Google Maps for the distance between Crete and Fylakio Reception and Identification center, available at: <https://bit.ly/3JUcBA5>

18 See 'The doctrine of the 'instrumentalization' of refugees: the borders of Evros in the era of border securitization' on humanrights360.org, available at: <https://bit.ly/332TOSC>

19 See 'testimony database' on borderviolence.eu, available at: <https://bit.ly/3GgTsG1>

20 Ibid.

21 See 'Annual torture report, 2020', on borderviolence.eu, available at: <https://bit.ly/3qej2pB>

22 See migration.gov.gr, see Διαδικασία Υποβολής Αιτημάτων Ασύλου, available at: <https://bit.ly/3zMvyjg>

23 See 'Refugees forced to claim asylum in 'jail-like' camps as Greece tightens system' on theguardian.com, available at: <https://bit.ly/3thMVYg>

24 See Ministry of Migration and Asylum Press releases for latest announcements from the Ministry, available at: <https://bit.ly/3zS6mlt>

25 See Asylum Information Database country report for Greece 2015, p.14, available at: <https://bit.ly/3FeVxRO> and Lives on Hold report, 2021, a timeline of the development of the Skype system and the languages added, p.11, available at: <https://bit.ly/3zJ6hGU>

26 See 'Μόνο σε νησιά και Έβρο τα νέα αιτήματα ασύλου' on Efsyn.gr, available in Greek at:

<https://bit.ly/3ncdQks>

27 See 'Η κυβέρνηση Μητσοτάκη επισφραγίζει την καταδίκη των νησιών και του Έβρου' on syriza.gr, available at: <https://bit.ly/3HUYwAA>

28 See migration.gov.gr, see Διαδικασία Υποβολής Αιτημάτων Ασύλου, available at: <https://bit.ly/3zMvyyg>

29 See 'Διαδικασία Υποβολής Αιτημάτων Ασύλου- Νέα Εγκύκλιος Υπουργείου μετά τις αντιδράσεις' on chionews.com, available at: <https://bit.ly/3nBu0UL>

30 See 'Refugees forced to claim asylum in 'jail-like' camps as Greece tightens system' on theguardian.com, available at: <https://bit.ly/3thMvYg>

31 See Lives on Hold report, 2021, p. 9, available at: <https://bit.ly/3zJ6hGU>

32 See Lives on Hold report, 2021, p. 27, available at: <https://bit.ly/3zJ6hGU>

33 See 'Operational data portal, Greece' on UNCHR website, available at: <https://bit.ly/3noy4qY>

34 See 'RIC Fylakio' on migration.gov.gr website, available at: <https://bit.ly/31MYAmp>

35 The 90 acre site of the Reception and Identification Center on Kos also includes a pre-removal detention centre with capacity for 600 people. See 'New closed controlled access center of Kos' on migration.gov.gr website, available at: <https://bit.ly/3FIG1Dr>

36 Government Decree on "suspension of the submission of asylum applications", Gov. Gazette A' 45/2.3.2020, available in Greek at: <https://bit.ly/3nhMPMI>

37 See Lives on Hold report, 2021, p. 13, available at: <https://bit.ly/3zJ6hGU>

38 See 'Refugees forced to claim asylum in 'jail-like' camps as Greece tightens system' on theguardian.com, available at: <https://bit.ly/3thMvYg>

39 See Article 39 of Hellenic Republic Law No. 4636/2019

40 See 'Legal and psychosocial support in the reception and identification center of Fylakio, Orestiadas/pre-removal center/border police stations' on humanrights360.org, available at: <https://bit.ly/3r7RH7R>

41 See Article 39(4) of Hellenic Republic Law No. 4636/2019

42 See 'Fylakio pre-removal center' on borderlandscapes.law.ox.ac.uk, available at: <https://bit.ly/3fjbFH7>

43 Ibid.

44 Marios Kaleas confirmed that changes to the registration of asylum applications was for the purpose of control in an article published by The Guardian. See 'Refugees forced to claim asylum in 'jail-like' camps as Greece tightens system' on theguardian.com, available at: <https://bit.ly/3thMvYg>

45 See 'Access to cash assistance' on UNHCR.org, available at: <https://bit.ly/3K2XFiy>

46 See Joint Ministerial Decision 2857, See also 'A big setback in integration: The cut in aid to asylum seekers' on gcr.gr, available at: <https://bit.ly/3390VIX>

47 See 'Walling Off Welcome: New reception facilities in Greece reinforce a policy of refugee containment and exclusion', Joint Policy Briefing, available at: <https://bit.ly/3zN4T5V>

48 See 'Greece: Asylum seekers being illegally detained in new EU-funded camp' on amnesty.org, available at: <https://bit.ly/3teLZnt>

49 Ibid.

50 See 'The asylum (international protection) application' on migration.gov.gr, available at: <https://bit.ly/3fauBrF>

51 See 'Schedule for the registration of requests for international protection' on migration.gov.gr, available at: <https://bit.ly/3tllt75>

52 See Lives on Hold report, 2021, p. 19, available at: <https://bit.ly/3zJ6hGU>

53 Including: Amygdaleza, Fylakio, Attica, Corinth, Thessaloniki, A.U.I.P.A. Georgia & Albania (Thess), Thrace, Patra, Fast-track, Alimos, Heraklion, Xanthi, Piraeus, Ioannina, Rhodes, A.U.I.P.A. Pakistan Attica. See 'Statistics' on migration.gov.gr, available at: <https://bit.ly/3qhuP6O>

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