

Fundamental rights of children displaced in the EU following the Russian war of aggression

Greece

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Author(s): Vasiliki P. Karzi, Lawyer

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1. Children fleeing Ukraine

1.1. Data on children fleeing Ukraine

Table 1 Children fleeing Ukraine

Category of child	Registration system Y/N	Number of children (as disaggregated as possible) (as of 30 April 2023 unless otherwise specified)
Overall number of children	Y	<p>Total: 6,709</p> <p><i>By nationality:</i> Ukrainian nationals: 6,674 Russian Nationals: 16 US Nationals: 5 Georgian Nationals: 4 Kazakhstan Nationals: 3 Moldovan Nationals: 2 Israeli Nationals: 1 Canadian Nationals: 1 Mexican Nationals: 1 Uzbekistan Nationals: 1 Turkish Nationals: 1</p> <p><i>By gender:</i> Female: 3,345 Male: 3,364</p> <p><i>By age:</i> Age 0-13: 5,434 Age 14-17: 1,275</p>
Arrived accompanied by mother, father or another legal guardian	Y	<p>Total: 6,158</p> <p><i>By nationality:</i> Ukrainian nationals: 6,123 Russian Nationals: 16 US Nationals: 5 Georgian Nationals: 4 Kazakhstan Nationals: 3 Moldovan Nationals: 2 Israeli Nationals: 1</p>

		<p>Canadian Nationals: 1 Mexican Nationals: 1 Uzbekistan Nationals: 1 Turkish Nationals: 1</p> <p><i>By gender:</i> Female: 3,055 Male: 3,103</p> <p><i>By age:</i> Age 0-13: 5,167 Age 14-17: 991</p>
Arrived without parents, but with other family members, neighbours or family friends	Y	<p>Total: 548</p> <p><i>By nationality:</i> Ukrainian nationals: 548 (No other nationalities recorded)</p> <p><i>By gender:</i> Female: 287 Male: 261</p> <p><i>By age:</i> Age 0-13: 267 Age 14-17: 281</p>
Arrived unaccompanied	Y	<p>Total: 3</p> <p><i>By nationality:</i> Ukrainian nationals: 3 (no other nationalities recorded)</p> <p><i>By gender:</i> Female: 3 Male: 0</p> <p><i>Per age:</i> Age 0-13: 0 Age 14-17: 3</p>
Arrived within a group of children, as an organised evacuation from Ukrainian institutions or foster carers (with or without an appointed legal guardian)	Y	<p>Total of 10 children from 1 Ukrainian Institution with legal guardians.</p> <p>Recorded as children arriving with legal guardians.</p>

Arrived within a group of children, through private initiatives, such as football clubs (with or without an appointed legal guardian)	Y	Recorded either as children arriving with a legal guardian or children arriving without other
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Source: Greek Ministry of Migration and Asylum (as of April 30, 2023)

In **Greece**, the **Ministry of Migration and Asylum** publishes data on international protection every month on its website and includes a separate chapter for individuals fleeing Ukraine.¹ Recent statistical data on temporary protection in **Greece**, as of April 30, 2023, is segregated by age and gender.² The **Greek Ministry of Migration and Asylum** provided FRA with more segregated data as included in the table above, as of April 30, 2023.³

In **Greece**, the **Special Secretary for the Protection of Unaccompanied Minors of the Ministry of Migration and Asylum** reported that the competent authorities during the arrival and stay of unaccompanied and separated children in Greece, are the Hellenic Police for their registration upon entry; the Special Secretariat for the Protection of Unaccompanied Minors for ensuring their protection; the Asylum Service which awards temporary protection; the Reception and Identification Service, when it is necessary to provide accommodation for adults with children; and the Prosecutor of the First Instance Court, who acts as a temporary guardian.⁴

In **Greece**, there is a separate registration system in place which records unaccompanied and separated children fleeing Ukraine. According to information provided by the **Special Secretary for the Protection of Unaccompanied Minors of the Ministry of Migration and Asylum**,⁵ the Greek National Emergency Response Mechanism (NERM), which is tasked with the protection and reception of all unaccompanied and separated children including those from Ukraine,⁶ has set up a separate registration procedure

¹ Greece, Ministry of Migration and Asylum, [Statistics](#), last accessed on 27.07.2023.

² Greece, Ministry of Migration and Asylum, [Report A April 2023-Appendix](#), last accessed on 27.07.2023, Table 20.

³ The information was provided by the Greek Ministry of Migration and Asylum via email on 13.06.2023.

⁴ The information was provided by the Greek Special Secretary for the Protection of Unaccompanied Minors through a written contribution on 12.06.2023.

⁵ The information was provided by the Greek Special Secretary for the Protection of Unaccompanied Minors through a written contribution on 12.06.2023.

⁶ Greece, Ministry of Migration and Asylum, [National Emergency Response Mechanism](#), last accessed on 27.07.2023.

which is activated as soon as an unaccompanied or separated child arriving from Ukraine enters Greece through any entry-point. At the same time, the NERM operates a hotline available in 7 languages for the referral of any unaccompanied or separated child arriving from Ukraine.

Registration in **Greece** starts with the Hellenic Police which records the entry of foreign nationals, including those arriving from Ukraine. According to the **Greek Ministry of Migration and Asylum's** dedicated website,⁷ holders of a Ukrainian biometric passport may enter through all entry points (land and air) with a maximum stay of 90 days and holders of a Ukrainian passport without biometric features (old type) may enter from all entry points (as long as they have a transit visa with a maximum stay of 90 days). The Hellenic Police at these entry points will stamp the passports with the exact date of entry. According to the website of the **Greek Ministry of Migration and Asylum**, in cases of children without travel documents, the Hellenic Police will note under the entry stamp on the adult's passport the number of children being accompanied.⁸ In this case, the adult has to provide a certificate of marital status or a birth certificate for his/her children. The **Greek Ministry of Migration and Asylum** does not mention that these documents should be translated, however, if these documents are not available, the adult accompanying any children without documents must complete and submit a solemn declaration stating the number of children, their first name, surname, gender and date of birth.

Furthermore, in **Greece**, as reported by the **Special Secretary for the Protection of Unaccompanied Minors**,⁹ the Hellenic Police registers at any entry point through a special form prepared by the Special Secretariat, i.e. the "*Form for the Notification of unaccompanied or separated from their family Child arriving from Ukraine*" ("*Φόρμα Αναγγελίας ασυνόδευτου ή χωρισμένου από την οικογένειά του Ανηλίκου από την Ουκρανία*"), the personal and address details of any child arriving in Greece without his/her parents, as well as the details of the accompanying adult and the family link with the child. The form even provides for cases where the accompanying relative drops-off the child to another relative in Greece, who will from then on care for the child. The form is then immediately forwarded to the Greek National Emergency Response

⁷ Greece, Ministry of Migration and Asylum, [Information for Displaced Persons from Ukraine](#), last accessed on 27.07.2023.

⁸ Greece, Ministry of Migration and Asylum, [Information for Displaced Persons from Ukraine](#), last accessed on 27.07.2023.

⁹ The information was provided by the Greek Special Secretary for the Protection of Unaccompanied Minors through a written contribution on 12.06.2023.

Mechanism (NERM) of the Special Secretariat for the Protection of Unaccompanied Children, which registers all unaccompanied children.¹⁰

Finally, according to information provided by the **Greek Asylum Service**,¹¹ displaced children from Ukraine due to the Russian invasion of 24.02.2022 as well as separated children arriving in Greece for the same reason accompanied by adult third-party individuals, can be registered as beneficiaries of temporary protection through an online application available on the Ministry of Migration and Asylum website followed by an appearance at one of its offices (in Athens, Thessaloniki, Patra, Rhodes, Kos and Herakleion).¹²

Unaccompanied children can either submit an online application or choose to apply in person at any of the Offices of the Greek Asylum Service. According the **Greek Ministry of Migration and Asylum** dedicated website for Ukraine, all procedures are performed with the help of a certified interpreter.¹³ As for the legal representation of unaccompanied children, according to Article 66E of Law 4939/2022¹⁴ the professional guardian is responsible and acts on the behalf of the unaccompanied child on issues related to international protection, including the submission of an application for the granting of temporary protection.¹⁵ There is no available data on how legal representation and translations services are financially supported.

¹⁰ Greece, [Greek National Emergency Response Mechanism](#), last accessed on 27.07.2023.

¹¹ The information was provided by the Greek Asylum Service through a written contribution on 12.06.2023.

¹² Greece, Ministry of Migration and Asylum, [online application](#), last accessed on 27.07.2023.

¹³ Greece, Ministry of Migration and Asylum, [Information for Displaced Persons from Ukraine](#), last accessed on 27.07.2023.

¹⁴ Greece, Law 4939/2022 on the Ratification of the Code of Legislation on the reception, international protection of third country nationals and stateless persons and temporary protection in the event of a mass influx of displaced foreigners ([Κύρωση Κώδικα Νομοθεσίας για την υποδοχή, τη διεθνή προστασία πολιτών τρίτων χωρών και ανιθαγενών και την προσωρινή προστασία σε περίπτωση μαζικής εισροής εκτοπισθέντων αλλοδαπών](#))(O.G. A 111/10.06.2022), last accessed on 27.07.2023.

¹⁵ Greece, Law 4939/2022 on the Ratification of the Code of Legislation on the reception, international protection of third country nationals and stateless persons and temporary protection in the event of a mass influx of displaced foreigners ([Κύρωση Κώδικα Νομοθεσίας για την υποδοχή, τη διεθνή προστασία πολιτών τρίτων χωρών και ανιθαγενών και την προσωρινή προστασία σε περίπτωση μαζικής εισροής εκτοπισθέντων αλλοδαπών](#))(O.G. A 111/10.06.2022), last accessed on 27.07.2023.

2. Child protection – legal, policy framework and procedures in place

2.1. Responsibilities of child protection authorities

2.1.1. Individual children, including unaccompanied and separated children

In **Greece**, there is a specific procedure in place for the involvement of authorities depending on whether the child is accompanied by an adult appointed as a guardian or not.

The authority tasked with protection and reception of unaccompanied and separated children fleeing Ukraine and arriving in **Greece**, is the Greek National Emergency Response Mechanism (NERM) of the Special Secretariat for the Protection of Unaccompanied Minors.¹⁶ According to the information provided by the Special Secretariat,¹⁷ NERM receives the registration forms filled in by the Hellenic Police at entry points which include information on the personal details of the unaccompanied or separated child, the address where the child will stay if it is accompanied by a relative, the relationship with the relative, even the details of the relative with which the child will be staying with.

It should be noted that the Greek Special Secretariat for the Protection of Unaccompanied Children reported that at the Promachona entry point, located in Northern Greece at the border with Bulgaria, from April 2022 to September 2022 there was a **Best Interest Evaluation Team of the NGO Arsis**, a partner of the Greek Special Secretariat for the Protection of Unaccompanied Minors, which under the coordination of the Greek National Response Mechanism (NERM) provided *in situ* evaluation of each

¹⁶ Greece, [Greek National Emergency Response Mechanism](#), last accessed on 27.07.2023.

¹⁷ The information was provided by the Greek Special Secretary for the Protection of Unaccompanied Children through a written contribution on 12.06.2023.

unaccompanied and separated child.¹⁸ Following an evaluation in a child-friendly area, the Best Interest Evaluation Team would prepare a fast-track evaluation report and forward it to NERM for further action. As of September 2022, and due to the small number of arrivals from Ukraine, the Best Interest Evaluation Team no longer provides *in situ* evaluation but remotely – unless their presence is deemed necessary.

According to a November **2022 report of the Special Secretariat for the Protection of Unaccompanied Minors** of the Greek Ministry of Migration and Asylum with the support of UNHCR, the UN Refugee Agency, and the European Union, after receiving the referral and the necessary documents, NERM ensures the immediate housing of unaccompanied children, while children accompanied by a relative or other known person, are referred either to the partners of NERM or to the social services of the Municipalities at the place of residency for immediate follow-up with regards to a best interest assessment and the registration procedure. In these cases the competent Public Prosecutor is notified in order to issue a prosecutorial order assigning temporary care of separated children only, if it is required.¹⁹ According to the **Greek Ministry of Migration and Asylum**, NERM maintains contact with its partners or social services of the Municipalities until the finalisation of the best interest assessment for each separated child.²⁰ NERM also requests a written update for each case of separated children. The **Greek Ministry of Migration and Asylum** has also responded that as of July 6, 2023 no cases regarding a Prosecutor's refusal to grant temporary care to a relative or other adult have been reported.²¹

According to the same report, in **Greece**, when a translated and certified notarial document assigning custody or temporary care by the parents of a separated child to a relative or other (non-related) adult is available, the document is recognised as valid by the Greek Authorities and no prosecutorial order is required.²² The same applies in cases where the child has entered Greece with his/her parents and then they leave the country entrusting the care of their child to a relative or other (non-related) adult through a certified and translated document drawn-up before the Ukrainian consulate

¹⁸ The information was provided by the Greek Special Secretary for the Protection of Unaccompanied Minors through a written contribution on 12.06.2023.

¹⁹ Greece, [National Emergency Response Mechanism](#), November 2022, last accessed on 27.07.2023, p. 28.

²⁰ The information was provided by the Greek Ministry of Migration and Asylum through a written contribution on 06.07.2023.

²¹ The information was provided by the Greek Ministry of Migration and Asylum through a written contribution on 06.07.2023.

²² Greece, [National Emergency Response Mechanism](#), November 2022, last accessed on 27.07.2023, p. 29.

authorities in Greece. When no document assigning the care of a child to the accompanying adult exists, a prosecutorial order is necessary for the appointment of a temporary guardian following a best interest assessment.

2.1.2. Children evacuated from Ukrainian institutions

In **Greece**, there has been only one case of children evacuated from Ukrainian Institutions.

According to information provided by the **Special Secretariat for the Protection of Unaccompanied Minors of the Greek Ministry of Migration and Asylum**, Greece has received 10 children from a Ukrainian institution through the coordinated effort of both the Greek and Ukrainian authorities.²³ The accompanying adults were appointed guardians prior to their arrival in Greece through notarised documents and placed with the children in a shelter.²⁴

According to the **Greek Ministry of Migration and Asylum**, the children came from an orphanage and travelled with the guardians appointed by the Ukrainian authorities.²⁵ Following a best interest assessment, the 10 children were placed in an accommodation centre that also hosts unaccompanied children.²⁶ The Centre has a specialised staff on child protection which offers psychosocial services, legal assistance and access to education.²⁷ The **Greek Ministry of Migration and Asylum** states that the specific case is under the supervision of the General Secretariat for Vulnerable Citizens and Institutional Protection - which was established in June 2023 - as well as the competent Prosecutor.²⁸

²³ The information was provided by the Greek Special Secretary for the Protection of Unaccompanied Minors through a written contribution on 12.06.2023.

²⁴ Greece, [National Emergency Response Mechanism](#), November 2022, last accessed on 27.07.2023, p. 29.

²⁵ The information was provided by the Greek Ministry of Migration and Asylum through a written contribution on 06.07.2023.

²⁶ The information was provided by the Greek Ministry of Migration and Asylum through a written contribution on 06.07.2023.

²⁷ The information was provided by the Greek Ministry of Migration and Asylum through a written contribution on 06.07.2023.

²⁸ The information was provided by the Greek Ministry of Migration and Asylum through a written contribution on 06.07.2023.

3. Guardianship/legal representation arrangements for unaccompanied and separated children fleeing Ukraine

3.1. Arrived unaccompanied

In **Greece** provisions for the guardianship of unaccompanied children were introduced through Law 4939/2022 (Legislation Code for the reception, international protection of third-country nationals and stateless persons and for temporary protection in cases of mass influx of displaced persons),²⁹ as amended by Law 4960/2022.³⁰ Articles 66A-66LB regulate the guardianship of all unaccompanied children whether they have applied for international protection or not.

In **Greece** a child who arrives on Greek territory not accompanied by an adult responsible for him/her in accordance with Greek legislation or practice, and for as long as he/she is not effectively taken into the care of such a person, is considered an unaccompanied child according to Article 1 (m) of Law 4939/2022.³¹ Unaccompanied

²⁹ Greece, Law 4939/2022 on the Ratification of the Code of Legislation on the reception, international protection of third country nationals and stateless persons and temporary protection in the event of a mass influx of displaced foreigners ([Κύρωση Κώδικα Νομοθεσίας για την υποδοχή, τη διεθνή προστασία πολιτών τρίτων χωρών και ανιθαγενών και την προσωρινή προστασία σε περίπτωση μαζικής εισροής εκτοπισθέντων αλλοδαπών](#))(O.G. A 111/10.06.2022), last accessed on 27.07.2023.

³⁰ Greece, Law 4960/2022 on the National Guardianship System and the Framework for the Accommodation of Unaccompanied Children and other provisions of the Ministry of Asylum and Migration ([Εθνικό Σύστημα Επιτροπείας και Πλαίσιο Φιλοξενίας Ασυνόδευτων Ανηλίκων και άλλες διατάξεις αρμοδιότητας του Υπουργείου Μετανάστευσης και Ασύλου](#))(O.G. A 145/22-07-2022), last accessed on 27.07.2023.

³¹ Greece, Law 4939/2022 on the Ratification of the Code of Legislation on the reception, international protection of third country nationals and stateless persons and temporary protection in the event of a mass influx of displaced foreigners ([Κύρωση Κώδικα Νομοθεσίας για την υποδοχή, τη διεθνή προστασία πολιτών τρίτων χωρών και ανιθαγενών και την προσωρινή προστασία σε περίπτωση μαζικής εισροής εκτοπισθέντων αλλοδαπών](#))(O.G. A 111/10.06.2022), last accessed on 27.07.2023.

children, due to their particular situation, are acknowledged as a vulnerable group in need of special protection according to Articles 62-64 of the above law whilst according to Article 1 (n) a “separated” child is a person under 18 who is deprived of parental care, but is accompanied by an adult relative who in practice cares for him/her.

Under the new legislative provisions on guardianship the Special Secretary for the Protection of Unaccompanied Minors is the general competent authority for the protection of unaccompanied children. According to Law 4960/2022,³² the provision of guardianship is relegated to a list of legal entities appointed by the Prosecutor (i.e., public entities, NGOs, international organisations) that collaborate with persons acting as guardians. The Prosecutor can also appoint a child’s family member or friend to be responsible for their everyday care.

In **Greece**, there are specific arrangements for unaccompanied children fleeing the war in Ukraine.

According to a November **2022 report of the Special Secretariat for the Protection of Unaccompanied Minors** of the Greek Ministry of Migration and Asylum with the support of UNHCR, the UN Refugee Agency, and the European Union, after receiving the referral and the necessary documents, the National Emergency Response Mechanism (NERM) is activated and ensures the immediate housing of unaccompanied children.³³ Separated children accompanied by an adult are referred either to the partners of NERM or to the social services of the Municipalities at the place of residency for immediate follow-up with regards to a best interest assessment and the registration procedure. The **Greek Ministry of Migration and Asylum** has a dedicated website where an accompanying adult may apply online for housing and food.³⁴

³² Greece, Law 4960/2022 on the National Guardianship System and the Framework for the Accommodation of Unaccompanied Children and other provisions of the Ministry of Asylum and Migration ([Εθνικό Σύστημα Επιτροπείας και Πλαίσιο Φιλοξενίας Ασυνόδευτων Ανηλίκων και άλλες διατάξεις αρμοδιότητας του Υπουργείου Μετανάστευσης και Ασύλου](#))(O.G. A 145/22-07-2022), last accessed on 27.07.2023.

³³ Greece, [National Emergency Response Mechanism](#), November 2022, last accessed on 27.07.2023, p. 28.

³⁴ Greece, Ministry of Migration and Asylum, [Application For Accommodation](#), last accessed on 27.07.2023.

3.2. Arrived without parents, but with other family members, neighbours or family friends

In **Greece**, the guardianship and legal representation of separated children arriving from Ukraine accompanied by adults that are not their parents, depends on whether the accompanying adults possess a certified and translated document awarding them with the care of the children.

According to a November **2022 report of the Special Secretariat for the Protection of Unaccompanied Minors** of the Greek Ministry of Migration and Asylum with the support of UNHCR, the UN Refugee Agency, and the European Union, children accompanied by a relative or other known person, are referred by the National Emergency Response Mechanism (NERM) either to the partners of the NERM or to the social services of the Municipalities at the place of residency for immediate follow-up with regards to a best interest assessment and the registration procedure, while the competent Public Prosecutor is notified in order to issue a prosecutorial order assigning temporary care of separated children only if the accompanying adult does not possess a translated and certified notarial document.³⁵ Article 661A, par. 3 of Law 4939/2022 explicitly states that the prosecutor may only assign for certain acts the temporary care of separated children and not legal guardianship.³⁶

According to the same report, in **Greece**, when a translated and certified notarial document assigning custody or temporary care by the parents of a separated child to a relative or other (non-related) adult is available, no prosecutorial order is required because this document is considered valid in Greece.³⁷ The same applies in cases where the child has entered Greece with his/her parents and then they leave the country entrusting the care of their child to a relative or other (non-related) adult through a

³⁵ Greece, [National Emergency Response Mechanism](#), November 2022, last accessed on 27.07.2023, p. 28.

³⁶ Greece, Law 4939/2022 on the Ratification of the Code of Legislation on the reception, international protection of third country nationals and stateless persons and temporary protection in the event of a mass influx of displaced foreigners ([Κύρωση Κώδικα Νομοθεσίας για την υποδοχή, τη διεθνή προστασία πολιτών τρίτων χωρών και ανιθαγενών και την προσωρινή προστασία σε περίπτωση μαζικής εισροής εκτοπισθέντων αλλοδαπών](#))(O.G. A 111/10.06.2022), last accessed on 27.07.2023.

³⁷ Greece, [National Emergency Response Mechanism](#), November 2022, last accessed on 27.07.2023, p. 29.

certified and translated document drawn-up before the Ukrainian consulate authorities in Greece.

3.3. Arrived within a group, from Ukrainian institution or foster carers (with or without an appointed legal guardian)

In **Greece**, the guardianship and legal representation of separated children arriving from a Ukraine Institution depends on whether the accompanying adults possess a certified and translated document appointing them as legal guardians. In **Greece** there has been only one case of children evacuated from Ukrainian Institutions.

According to information provided by the **Special Secretariat for the Protection of Unaccompanied Minors of the Greek Ministry of Migration and Asylum**, Greece has received 10 children from a Ukrainian institution through the coordinated effort of both the Greek and Ukrainian authorities.³⁸ The accompanying adults were appointed guardians prior to their arrival in Greece through notarised documents and placed with the children in a shelter.³⁹

3.4. Arrived within a group, through private initiatives, such as football clubs (with or without an appointed legal guardian)

In **Greece** there are no specific arrangements in place for children arriving within a group through private initiatives.

According to information provided by the **Special Secretariat for the Protection of Unaccompanied Minors of the Greek Ministry of Migration and Asylum**, cases

³⁸ The information was provided by the Greek Special Secretary for the Protection of Unaccompanied Minors through a written contribution on 12.06.2023.

³⁹ Greece, [National Emergency Response Mechanism](#), November 2022, last accessed on 27.07.2023, p. 29.

concerning the guardianship of children arriving in within a group through a private initiative shall be treated as cases of separated children accompanied by non-relative adults.⁴⁰ If there is no certified and translated document with the appointment of guardianship, then an application must be filed before the competent Prosecutorial Authorities for the issuance of a prosecutorial order awarding temporary care of the separated children to the accompanying adults.

⁴⁰ The information was provided by the Greek Special Secretary for the Protection of Unaccompanied Minors through a written contribution on 12.06.2023.

4. Information and practical challenges in access to basic services for children fleeing Ukraine

4.1. General information and challenges

a) Education

In **Greece** school attendance is mandatory for children aged six to fifteen years old. According to Article 130 of Law 4939/2022⁴¹: ‘Beneficiaries of temporary protection who are under 18 years of age shall be granted the right of access to public schools in which reception classes or tutorial classes are in operation or are planned to be in operation.’ It should be noted that under the same law, in **Greece** temporary protection beneficiaries are entitled to education under the same conditions as nationals. Given that temporary protection is only awarded to people fleeing Ukraine as a result of the war, this also applies to children fleeing Ukraine.

There is no publicly available data on the number of child beneficiaries of temporary protection that had accessed the education system by the end of 2022. However, according to the **Greek Ministry of Education** for the school year of 2022-2023 there were more than 1,200 child beneficiaries of temporary protection enrolled in the Greek educational system. Specifically, as of June 2023 there was a total of 1,234 children from Ukraine enrolled at Greek schools (primary, junior and senior high-schools).⁴² It should be noted that according to the Asylum Information Database (AIDA) 2022 Report on Temporary Protection in Greece, the language barrier is an important challenge;

⁴¹ Greece, Law 4939/2022 on the Ratification of the Code of Legislation on the reception, international protection of third country nationals and stateless persons and temporary protection in the event of a mass influx of displaced foreigners ([*Κύρωση Κώδικα Νομοθεσίας για την υποδοχή, τη διεθνή προστασία πολιτών τρίτων χωρών και ανιθαγενών και την προσωρινή προστασία σε περίπτωση μαζικής εισροής εκτοπισθέντων αλλοδαπών*](#))(O.G. A 111/10.06.2022), last accessed on 27.07.2023.

⁴² The information was provided by the Greek Ministry of Education through a written contribution on 25.07.2023.

accommodation in camps also poses an issue as camps are remote without appropriate options for commuting and so access to school is problematic; the HELIOS project - an accommodation project in Greece - requires beneficiaries to rent apartments on their own and sometimes schools are not close.⁴³

The Asylum Information Database (AIDA) 2022 Report on Temporary Protection in Greece,⁴⁴ also notes that in some cases small school units are unable to accommodate all children because of lack of capacity. Furthermore, AIDA states that the phenomenon of schools being reluctant to accommodate refugee children does not apply with children from Ukraine and that there are only limited places in specific areas for children with special needs.

b) Social welfare and healthcare

In **Greece** social welfare is provided for beneficiaries of temporary protection according to Article 129 of Law 4939/2022.⁴⁵

According to the **Greek Ministry of Migration and Asylum's** dedicated website for refugees from the Ukraine, the Ministry will provide accommodation, food, clothing and any other possible social assistance.⁴⁶ There is an online form that has to be submitted by the beneficiary.⁴⁷

There is no available data on the number of beneficiaries of temporary protection who have accessed different forms of social welfare.

In **Greece**, according to the Greek Ministry of Health Circular No. Γ2δ/Γ.Π.οικ.17033/22-03-2022,⁴⁸ Ukrainian refugees are entitled to access for free the services of public

⁴³ Greece, AIDA, Temporary Protection, [Greece](#), 2023, last accessed on 27.07.2023, p. 8.

⁴⁴ Greece, AIDA, Temporary Protection, [Greece](#), 2023, last accessed on 27.07.2023, p. 9.

⁴⁵ Greece, Law 4939/2022 on the Ratification of the Code of Legislation on the reception, international protection of third country nationals and stateless persons and temporary protection in the event of a mass influx of displaced foreigners ([Κύρωση Κώδικα Νομοθεσίας για την υποδοχή, τη διεθνή προστασία πολιτών τρίτων χωρών και ανιθαγενών και την προσωρινή προστασία σε περίπτωση μαζικής εισροής εκτοπισθέντων αλλοδαπών](#))(O.G. A 111/10.06.2022).

⁴⁶ Greece, Ministry of Migration and Asylum, [Questions and Answers](#), last accessed on 27.07.2023.

⁴⁷ Greece, Ministry of Migration and Asylum, [Application For Accommodation](#), last accessed on 27.07.2023.

⁴⁸ Greece, Ministry of Health, [Circular No. Γ2δ/Γ.Π.οικ.17033/22-03-2022](#), on the access of displaced Ukrainians in the National Health System, last accessed on 27.07.2023.

hospitals and medical centers, including mental health and physical rehabilitation facilities, even if they have not been provided yet with a social security number (AMKA). Ukrainian refugees without an AMKA can access public health by showing their passport or, if they do not have it, a document issued by the police. According to the **Greek Ministry of Migration and Asylum's** dedicated website for refugees fleeing Ukraine,⁴⁹ a helpline providing psychological support offers free mental health support to refugees from Ukraine.

In **Greece** according to Article 129 (paragraph 2) of Law 4939/2022⁵⁰: 'Temporary protection beneficiaries shall be provided with necessary medical care, including any necessary treatment of illnesses, first aid and at least one medical examination.' Greek Ministry of Health Circular No. Γ2δ/Γ.Π.οικ.17033/22-03-2022,⁵¹ also clarifies that individuals fleeing Ukraine due to the war, are included in the category of a vulnerable uninsured group which enjoys free access to hospital care and medicinal treatment within the National Health System.

The European Union Agency for Asylum (EUAA) Booklet on Temporary Protection states that in **Greece** once beneficiaries of temporary protection receive a unique social security number, vaccinations for children as well as other public medical services are accessible and free of charge.⁵² They are performed according to standardised medical protocols.

The European Union Agency for Asylum (EUAA) booklet also notes that interpretation from Greek to Ukrainian language and vice versa cannot be guaranteed at the medical care units (hospitals, etc.) and that according to the recommendations of the responsible Ministry, Ukrainian refugees are encouraged to be accompanied by a person that speaks either Greek or English language, who will act as interpreter during their visit

⁴⁹ Greece, Ministry of Migration and Asylum, [Questions and Answers](#), last accessed on 27.07.2023.

⁵⁰ Greece, Law 4939/2022 on the Ratification of the Code of Legislation on the reception, international protection of third country nationals and stateless persons and temporary protection in the event of a mass influx of displaced foreigners ([Κύρωση Κώδικα Νομοθεσίας για την υποδοχή, τη διεθνή προστασία πολιτών τρίτων χωρών και ανιθαγενών και την προσωρινή προστασία σε περίπτωση μαζικής εισροής εκτοπισθέντων αλλοδαπών](#))(O.G. A 111/10.06.2022), last accessed on 27.07.2023.

⁵¹ Greece, Ministry of Health, [Circular No. Γ2δ/Γ.Π.οικ.17033/22-03-2022](#), on the access of displaced Ukrainians in the National Health System, last accessed on 27.07.2023.

⁵² EUAA, [Booklet](#), Information on temporary Protection in Greece, 2022, last accessed on 27.07.2023, p. 12.

to such medical facilities.⁵³ The EUAA provides a link to the dedicated website of the Greek Ministry of Migration and Asylum for Ukraine.

4.2. Challenges for children at multiple risk/disadvantage

In **Greece** there is very limited information on children at multiple risk/disadvantage arriving from Ukraine as a result of the war. The Greek Ministry of Migration and Asylum did not provide any data or information on particular groups such as Roma, children with disabilities, stateless children or other children at multiple risk of exclusion.

The Greek Special Secretariat for the Protection of Unaccompanied Children reported that in **Greece** under the National Emergency Response Mechanism (NERM) the immediate housing of unaccompanied children is ensured, while children accompanied by a relative or other known person, are referred either to the partners of NERM or to the social services of the Municipalities at the place of residency for immediate follow-up with regards to a best interest assessment and the registration procedure.⁵⁴

According to a Policy and Legal Review 2022 prepared by UNICEF Greece, the NGO 'Smile of the Child' and Eurochild concerning Ukrainian unaccompanied children,⁵⁵ in **Greece** all necessary steps are taken for the placement of unaccompanied children in an appropriate accommodation facility through a referral to the Special Secretariat for the Protection of Unaccompanied Minors and a very brief social history drafted by the **Best Interest Evaluation Team of the NGO Arsis** - a partner of the Greek Special Secretariate for the Protection of Unaccompanied Minors - is sent along with some vulnerability indicators in order to make proper arrangements for each child's case.

On the other hand, the Asylum Information Database (AIDA) 2022 Report on Temporary Protection in Greece, states that there were no specific procedures for the identification of vulnerability in **Greece** and no procedure was introduced or adapted to the needs of

⁵³ EUAA, [Booklet](#), Information on temporary Protection in Greece, 2022, last accessed on 27.07.2023, p. 11.

⁵⁴ The information was provided by the Greek Special Secretary for the Protection of Unaccompanied Minors through a written contribution on 12.06.2023.

⁵⁵ Greece, UNICEF Greece, The Smile of the Child, Eurochild, [Policy & Legal review for children in alternative care & unaccompanied and separated children from Ukraine arriving in: GREECE](#), 2022, last accessed on 27.07.2023.

non-accompanied minors entitled to temporary protection.⁵⁶ There was no specific programme to address the needs of individuals fleeing from Ukraine suffering from mental health problems, including torture survivors. In practice some NGOs provided assistance.

Finally, according to the **Greek Ministry of Education**, its Autonomous Department for the Coordination and Monitoring of the Education of Refugees has set in place an operational target for the enrolment and school attendance of the student population arriving from Ukraine and aims to implement during the new school year the long-term sustainability of all educational interventions for children from Ukraine.⁵⁷ Specifically, the **Greek Ministry of Education** will implement a systemic registration of all refugee children from Ukraine with disabilities and other special needs, in order to introduce necessary measures that will ensure their equal access to public schools, empower them and re-frame in a positive way the educational tools available to the educational community.

⁵⁶ Greece, AIDA, Temporary Protection, [Greece](#), 2023, last accessed on 27.07.2023, p. 4.

⁵⁷ The information was provided by the Ministry of Education through a written contribution on 25.07.2023.

5. Policies in place

5.1. Dedicated action plan and/or integrated measures

In **Greece** the most notable policy addressing children fleeing Ukraine and concerning their integration is that of the Greek Ministry of Education. According to the website of the Ministry of Education under “Initiatives to support the Ukrainian education community in Ukraine and beyond”⁵⁸ the following actions are carried out:

a) Measures for the integration of children from Ukraine in the education field:

- Reception classes
- Provision of interpretation services even via telephone
- Preparation of educational material with UNICEF and its publication on Ukrainian Community websites
- Intercultural educational seminars
- Educational manual for educators
- Guide for the educational integration of children from Ukraine available in Ukrainian and Russian with lessons for the first weeks at school
- Psychosocial support with the assistance of UNICEF

b) Support for the Ukrainian educational community at an EU level

- The creation of a European action group “Education Solidarity Group” for coordinated support and the distribution of good practices⁵⁹

⁵⁸ Greece, Ministry of Education, [Initiatives to support the Ukrainian education community in Ukraine and beyond](#), last accessed on 27.07.2023.

⁵⁹ European Commission, [Fleeing Ukraine: support for education](#), last accessed on 27.07.2023; European Trade Union Committee for Education, [European Commission’s initiatives](#), last accessed on 27.07.2023.

- The creation of a digital platform for the reception of requests for material, educational and technical support and the creation of a mechanism for addressing any needs within the Ukrainian Educational community.

5.2. European Child Guarantee

In September 2022, **Greece's National Action Plan for the European Child Guarantee** (NAP) was published on the European Commission's website.⁶⁰ Even though the NAP states that the war in Ukraine, including the energy crisis and the implications of the migration flow from the war zone of Ukraine, require a comprehensive and multidimensional approach, as well a support policy framework to tackle the barriers faced by children, there is no specific measure that addresses the basic need for protection and access for services for children fleeing Ukraine. It should be noted that separated children fleeing Ukraine are mentioned as a specific category of children in need under the title: "Homeless children or children experiencing severe housing deprivation".⁶¹

5.3. Budget

In **Greece**, there is no publicly available data on a specific budget allocated for displaced children from the Ukraine in the current or future annual budgets (predominantly based on desktop research).

According to a November **2022 report of the Special Secretariat for the Protection of Unaccompanied Minors** of the Greek Ministry of Migration and Asylum with the support of UNHCR, the UN Refugee Agency, and the European Union,⁶² cases of separated children accompanied by a relative or other adult and referred to municipal social services, the National Emergency Response Mechanism components, apart from the emergency accommodation facilities, operated from January 2021 to December 2022 with the financial support of UNHCR and the European Union. From the 1st of January

⁶⁰ European Commission, [Greece – National Action Plan for the European Child Guarantee](#), September 2022, last accessed on 27.07.2023.

⁶¹ European Commission, [Greece – National Action Plan for the European Child Guarantee](#), September 2022, last accessed on 27.07.2023, p. 11.

⁶² Greece, [National Emergency Response Mechanism](#), November 2022, last accessed on 27.07.2023, p. 33.

2023, funding for NERM was to be secured through EEA Grants. The emergency shelters run by IOM are funded by the Danish Government. However, there is no mention of the exact budget.
