

Report on the Situation of Returnees and Beneficiaries of International Protection in Greece

Research by Michael Kientzle

Commissioned by NAOMI Thessaloniki and supported by the Protestant Church in
the Rhineland

May 2026



The report was researched and written by Michael Kientzle on behalf of NAOMI Thessaloniki. The research was prompted by an inquiry addressed to NAOMI Thessaloniki by the 12th Chamber of the Administrative Court of Hamburg. The preparation of the report was financially and organisationally supported by NAOMI Thessaloniki and the Protestant Church in the Rhineland. The content, methodology, assessments and conclusions are the sole responsibility of the author.

This report is an English translation of the German original in its editorially corrected version of late June 2026. The translation was prepared and reviewed by Michael Kientzle.

Acknowledgements

The author thanks all returnees and organisations that were interviewed in the course of this research or provided information and statistical data. Special thanks go to Mariangela Psyrraki, social worker at Meraki Humanitarian Support, for her commitment and for the information provided.

Terms of Use

The report may be quoted and shared provided that the source is acknowledged. Alterations, translations, abridged versions and summaries intended to be disseminated as independent publications require the author's consent.

Suggested citation: Michael Kientzle, Report on the Situation of Returnees and Beneficiaries of International Protection in Greece, research commissioned by NAOMI Thessaloniki, May 2026

Table of Contents

Background and Methodology.....	4
Section I: Documents.....	8
Chapter 1: Obtaining Documents.....	8
Chapter 2: Structural Obstacles in Obtaining Documents.....	18
Section II: Accommodation and Homelessness.....	22
Chapter 3: Access to the Formal Rental Market.....	22
Chapter 4: Accommodation of Returnees in Camps for Asylum Seekers.....	25
Chapter 5: Homeless Shelters.....	27
Chapter 6: Accommodation Provided by Civil Society and Church-Based Organisations.....	30
Chapter 7: Informal Accommodation.....	37
Chapter 8: Homelessness.....	45
Section III: Access to the Labour Market.....	51
Chapter 9: Legal Employment.....	51
Chapter 10: Access to Informal Work.....	55
Chapter 11: Language Skills and Access to Employment.....	57
Chapter 12: Gender-Specific Differences in Access to the Labour Market.....	59
Section IV: Conditions in Informal Work.....	62
Chapter 13: Working Conditions in Informal Work.....	62
Chapter 14: Abuses and Risks in Informal Work.....	64
Section V: State Support Programmes.....	70
Chapter 15: HELIOS+ and the Bridging Programme.....	70
Chapter 16: The Programme “Housing and Work for the Homeless”.....	78
Section VI: Gender-Based Risks.....	82
Chapter 17: Sexualised Violence and Exploitation.....	82
Concluding Remarks.....	90
Annexes.....	94
Annex 1: Overview of the Situation of the Interviewed Returnees.....	94
Annex 2: Inquiry from the Administrative Court of Hamburg.....	105
Annex 3: Overview of the Organisations Involved in the Research.....	121
Annex 4: Information Provided by the Department Responsible for Camp Allocations on the Accommodation of Returnees.....	123
Annex 5: Information Provided by the BAMF on the Bridging Programme.....	125
Annex 6: Information Provided by OPEKA on the “Housing and Work for the Homeless” Programme.....	131

Background and Methodology

Background of the Report

The report originated from an inquiry from the 12th Chamber of the Administrative Court of Hamburg to NAOMI Thessaloniki concerning the situation in practice of persons who have been granted international protection in Greece and return there from other EU Member States. The inquiry related in particular to access to accommodation, work, documents and support, as well as to possible gender-specific differences. At the end of April 2026, the author submitted a response to the Court's questions on behalf of NAOMI Thessaloniki. This report builds on that response and has been editorially revised. The full inquiry is reproduced in Annex 2.

About the Author of the Report

Michael Kientzle, hereinafter the author, is co-founder and former director of Mobile Info Team. From January 2016 to October 2025, he worked in Greece and led the organisation from its establishment in summer 2016 until autumn 2025. Mobile Info Team provides information on asylum and integration procedures in Greece and supports individual cases, in particular those of asylum seekers and beneficiaries of international protection.

In the course of his work, the author was continuously engaged with the legal framework and the practical implementation of asylum and integration procedures in Greece, including through research and training activities as well as direct casework. One of the main areas of focus of his work was the situation of beneficiaries of international protection recognised in Greece, particularly with regard to integration opportunities, access to documents and existing structural obstacles. The situation of beneficiaries of international protection who had left Greece or returned to Greece was also a regular focus of his work.

About the Commissioning Organisation

NAOMI – Ecumenical Workshop for Refugees in Thessaloniki (NAOMI): NAOMI is a Greek non-profit organisation that has been active since 2016. It provides humanitarian assistance to people affected by displacement and offers programmes to promote their participation in social life.

This includes, among other things, a social service, a safe space for girls and women, and a Textile Academy to strengthen independence and prepare people for the labour market. In addition, a textile workshop offering fair employment to beneficiaries of international protection and asylum seekers supports their integration. Through its social service, NAOMI increasingly supports beneficiaries of international protection in precarious living circumstances and returnees.

About the Supporting Organisation

The Protestant Church in the Rhineland is the second-largest regional church within the Protestant Church in Germany and comprises congregations in parts of North Rhine-Westphalia, Rhineland-Palatinate, Saarland and Hesse. Since the late 1990s, it has been engaged in the field of refugee protection at the EU's external borders and publishes an annual report on this issue. It also supports projects for and with people affected by displacement, including in Morocco, Italy, Hungary and Greece. Since 2016, it has coordinated the support provided by various churches and Diaconal organisations to NAOMI Thessaloniki. In the years 2023 to 2025, it also provided financial support to Mobile Info Team.

Terms Used in the Report

Beneficiaries of international protection: Persons who have been granted international protection in Greece, meaning persons with refugee status as well as beneficiaries of subsidiary protection.

Returnees: Beneficiaries of international protection who were returned to Greece from other European countries or who returned independently after they could no longer legally remain in the respective country, following a final negative decision in the asylum procedure.

Interviewees: Returnees who were interviewed as part of this research.

People affected by displacement: Asylum seekers, beneficiaries of international protection and persons without regular residence status whose living situation is shaped by displacement.

Unofficial hostels: Forms of accommodation that are sometimes known as “Masafarhanas”.

Informal work: Work outside a fully registered employment relationship. This includes, in particular, work without an employment contract, without registration with the competent authorities, or with only partial or inaccurate registration.

Greek Administrative Terms and Institutions

AFM: Αριθμός Φορολογικού Μητρώου (ΑΦΜ)

Greek tax identification number, required for numerous administrative procedures, including in connection with work, housing, bank accounts and tax obligations.

AMA: Αριθμός Μητρώου Ασφαλισμένου (ΑΜΑ)

Registration number of the insured person with the social security system, particularly relevant in connection with the registration of employment.

ΑΜΚΑ: Αριθμός Μητρώου Κοινωνικής Ασφάλισης (ΑΜΚΑ)

Greek social security number, which is of central importance, among other things, for access to the healthcare system, social security and certain social benefits.

Taxisnet:

Electronic tax portal of the Greek tax administration, which is required for numerous digital administrative procedures, primarily in connection with tax matters, but also for social benefits and other online administrative services.

ΔΥΠΑ: Δημόσια Υπηρεσία Απασχόλησης (ΔΥΠΑ)

Public Employment Service, responsible, among other things, for unemployment registration and labour-market-related programmes.

ΕΦΚΑ: Ηλεκτρονικός Εθνικός Φορέας Κοινωνικής Ασφάλισης (e-ΕΦΚΑ)

Electronic National Social Security Institution, responsible for key areas of social security.

ΚΕΜ: Κέντρο Ένταξης Μεταναστών (ΚΕΜ)

Migrant Integration Centre, which provides municipal support and counselling services for migrants.

ΚΕΠ: Κέντρο Εξυπηρέτησης Πολιτών (ΚΕΠ)

Citizen Service Centre, which serves as a point of contact for various administrative matters.

ΟΠΕΚΑ: Οργανισμός Προνιοικών Επιδομάτων και Κοινωνικής Αλληλεγγύης (ΟΠΕΚΑ)

Organisation for Welfare Benefits and Social Solidarity, responsible for the administration and payment of certain social benefits and support programmes.

RIS: Υπηρεσία Υποδοχής και Ταυτοποίησης (ΥΠ.Υ.Τ.)

Reception and Identification Service, responsible in particular for the state reception and identification system for asylum seekers.

Methodology

This research is based on a combination of interviews with returnees and relevant organisations, information provided by authorities, and supplementary desk research. The author's longstanding practical experience was additionally used to contextualise these findings. Data collection took place from February to April 2026.

As part of the research, nine returnees were interviewed. In eight cases, contact with this target group was established through organisations working with people affected by displacement. One further interview was conducted with a person with whom contact already existed due to previous support provided by the author. Since all interviews were arranged through contacts with supporting organisations, it can be assumed that persons with access to support structures, particularly in the area of accommodation, are overrepresented in this report. An overview of the situation of the interviewed returnees after their return to Greece and, where relevant, of their situation before leaving Greece, can be found in Annex 1.

All returnees who were reachable during the relevant period and agreed to participate were included. The aim was to reflect the available direct experiences of returnees as comprehensively as possible. Due to the limited accessibility of this target group, this is not a representative sample, but rather a qualitative account of individual experiences.

The interviews took place in February and March 2026 and were conducted by telephone or in writing via messenger services. The interviews were conducted in languages in which the interviewees were able to communicate and express themselves. Where necessary, interpretation or written translation was used to enable communication with the author. All interviewees were informed about the purpose and content of the research and consented to the anonymised use of their statements.

In addition, 14 persons from a total of 11 organisations were interviewed during the same period. Representatives of Action for Women (AFW), Choosehumanity, CRIBS International (Cribs), International Social Service Switzerland (ISS), Love without Borders (LWB), Mazi Housing (Mazi), Medical Solidarity International (MSI), Meraki Humanitarian Support (Meraki), NAOMI – Ecumenical Workshop for Refugees in Thessaloniki (NAOMI), Refugee Support Aegean (RSA) and Wave were interviewed.

The organisations interviewed were selected specifically on the basis of their respective areas of work. In particular, organisations were included that work directly with returnees or have specific expertise in areas central to the report, including accommodation and homelessness, access to work and employment, medical care, legal and administrative issues, social work and practical support, as well as the situation of women and particularly vulnerable beneficiaries of international protection. The aim was to bring together different perspectives and areas of expertise in order to obtain as comprehensive a picture of the situation as possible. The organisations interviewed were also informed about the purpose and content of the research and consented to the use of their statements.

Where the report refers to information, reports or assessments by the organisations listed here, these are based on the interviews conducted or written information provided as part of this research, unless another source is expressly indicated.

In addition, Mobile Info Team, Meraki, Cribs, the Pope John XXIII Community in Athens and Mazi provided data or statistical information, which was incorporated into this research with the consent of the respective organisations. The data provided by the organisations were used in a supplementary

manner where relevant to individual thematic areas. Since they originate from different fields of work and contexts of data collection, their significance and the limits of their evidentiary value are assessed in the relevant sections of the report. Annex 3 contains an overview of the organisations involved in the research and their areas of work relevant to the report.

In addition, information was obtained from Greek and German authorities on individual questions. The relevant information is identified in the respective chapters and reproduced in the annexes in the original and in English translation.

The supplementary desk research included, in particular, legal and administrative frameworks, official and ministerial publications, information on relevant support programmes, reports and studies by organisations, international actors and academic sources, statistical publications, media reports and press releases. As a preparatory step, relevant German-language administrative court case law on the return of beneficiaries of international protection to Greece was also analysed in order to identify recurring judicial assumptions, factual points of dispute and open questions, and to specify the questions used in the interviews accordingly.

The author's practical experience from more than nine years of work in Greece was used in particular to contextualise legal and administrative frameworks, their practical implementation, and the information provided by organisations and affected persons. In some places, the report also draws on the author's own experience from casework and from supervising team members engaged in casework. This is indicated in the report where applicable.

Guide to the Report

The report is structured thematically. Since the chapters build on one another and are substantively interconnected, the report should be considered as a whole in order to understand the overall context and should not be read exclusively chapter by chapter. The chapters contain their own introductions and, where helpful for contextualisation, conclude with a brief summary.

Without replacing the need to consider the report as a whole, the following sections may be especially relevant for orientation when assessing the situation in practice of beneficiaries of international protection and returnees. These include, in particular:

- the presentation of administrative requirements and structural obstacles in accessing documents and the healthcare system in Chapters 1 and 2,
- the information provided by the Greek authorities on whether returnees can be accommodated again in camps after return in Chapter 4,
- the overview of accommodation options provided by civil-society and church-based organisations in Chapter 6,
- the detailed presentation of housing and living conditions in unofficial hostels in Chapter 7,
- the overview of available information on the prevalence of homelessness among beneficiaries of international protection and statistics on homelessness among returnees in Chapter 8,
- the assessment of access to informal work on the basis of concrete cases in Chapter 10,
- the assessment of abuses and risks in informal work in Chapter 14,
- the analysis of the available data from the HELIOS+ project as well as the response from the Federal Office for Migration and Refugees concerning the bridging programme for returnees from Germany in Chapter 15,
- the information provided by OPEKA on the "Housing and Work for the Homeless" programme in Chapter 16,
- as well as the compilation of findings on sexualised violence and exploitation in Chapter 17.

Section I: Documents

Chapter 1: Obtaining Documents

Introduction

The following section presents the findings from this research concerning the documents and administrative requirements that are of central importance for beneficiaries of international protection in accessing legal housing and legal employment in Greece. In addition, it examines the practical obstacles that exist in accessing the healthcare system.

AFM

The Greek tax identification number (AFM) is essential for access to legal employment and for renting housing legally. In addition, having an AFM is a necessary prerequisite for opening a bank account and for access to certain support programmes such as HELIOS+ or the “Housing and Work for the Homeless” programme. Since 31 December 2020, asylum seekers are normally assigned an AFM by the Greek Asylum Service as part of the asylum procedure.¹ If beneficiaries of international protection did not receive an AFM during the asylum procedure and already hold a residence permit, the AFM must be applied for subsequently at the competent tax office.² In addition, the AFM is automatically deactivated once the residence permit expires and cannot be used until the permit has been renewed.³

According to RSA, significant obstacles exist in practice when an AFM is issued for the first time, particularly for persons who were not assigned a tax identification number during the asylum procedure, which occurs especially in the case of returnees. Applying for an AFM at the tax office at a later stage is subject to strict formal requirements that are difficult for many returnees to meet, such as a registered address and a valid residence permit. In addition, further obstacles arise in practice, for example when applications are rejected due to formal inconsistencies or when authorities impose contradictory requirements.

Retrieving an AFM number that has already been issued but has been lost, another frequently reported problem among returnees, is also difficult in practice according to RSA. In such cases, assistance from lawyers or accountants may be required to submit the relevant requests to the competent authorities. The updating of the information recorded with the tax authority, described in the following subchapter on Taxisnet, may also be relevant in this context. Data that have not been updated may further complicate the retrieval of the AFM.

RSA reports that the initial issuance of an AFM and the retrieval of an already issued AFM number are almost impossible for returnees without professional support and, even with support from lawyers or social workers, continue to involve considerable practical difficulties.

Access to Taxisnet

Access to the Greek tax portal Taxisnet is necessary, among other things, in order to submit a tax return or officially register a rental contract.

Both RSA and Meraki report that, before applying for Taxisnet access, the currently valid residence permit must first be registered with the tax office. The AFM is usually created during the asylum

¹ Decision A.1270 of the Director of the Independent Authority for Public Revenue, Procedure for Assigning a Tax Identification Number to Applicants for International Protection of 14 December 2020, ΦΕΚ Β 5508/14.12.2020, <https://www.taxheaven.gr/circulars/35071/a-1270-2020>, accessed 6 April 2026.

² RSA / Stiftung PRO ASYL, Recognised Refugees 2025: Access to Documents and Socio-Economic Rights, 2025, p. 21, https://rsaegean.org/wp-content/uploads/2025/04/RSA_BIP_Report_EN.pdf, accessed 6 April 2026.

³ Ibid.

procedure and is initially linked to the asylum seeker card. However, after recognition and receipt of the residence permit, the data are not updated automatically. Without this update, the person cannot be correctly identified in the system and, consequently, Taxisnet access cannot be created.

Updating the data is generally only possible while the residence permit is valid.⁴ This requires either an appointment at the tax office, although even booking such an appointment is difficult for many beneficiaries of international protection due to language barriers, or support from accountants, lawyers or social workers with their own Taxisnet access. Free support, however, is extremely limited: according to Meraki, only two organisations currently offer such assistance, with limited language coverage (English or Arabic). The data must also be updated again each time the residence permit is renewed.

According to the official website of the Greek government, it is possible to apply for Taxisnet access online, provided that the person has an AFM, an identification document, a valid and active bank account, and a Greek telephone number.⁵ In practice, however, this option is often unavailable: banks frequently require a tax return in order to open an account, for which Taxisnet access is in turn required.

Alternatively, Taxisnet access can be applied for during an appointment at the tax office. Here, too, however, significant linguistic and digital barriers exist. The relevant platforms are largely available only in Greek, including the application process, appointment booking and activation of login credentials.⁶ This significantly impedes access and increases dependence on organisations or paid private agencies.

Tax Clearance Certificate

In Greece, a tax clearance certificate is required in many procedures in order to prove income or the absence of income. This is regularly required, for example, for an application for support under the “Housing and Work for the Homeless” programme or for the guaranteed minimum income. Banks also frequently require a tax clearance certificate or, alternatively, a solemn declaration that the applicant is not obliged to submit a tax return. A tax return is submitted digitally through the Taxisnet portal and is only possible with the relevant login credentials and an AFM.

The Greek tax system is complex, which is why organisations in practice often advise people to hire an accountant to submit a tax return.⁷ A small number of organisations provide free support, however, these services are often fully booked weeks before the deadline. The cost of a private accountant is usually between EUR 30 and 50, which, depending on the person’s financial situation, may constitute an access barrier for beneficiaries of international protection.

A practical problem is that a current tax clearance certificate for a specific tax year only becomes available once the corresponding tax return can be submitted. In Greece, the return can only be submitted in the following year, for example for the 2025 tax year from 16 March 2026.⁸

⁴ RSA, Recognised Refugees 2025, pp. 20–21.

⁵ Gov.gr, Electronic registration/management of Taxisnet codes, Greek-language website, <https://www.gov.gr/ipiresies/polites-kai-kathemerinoteta/ellenes-tou-exoterikou/elektronike-eggraphe-diakheirise-kodikon-taxisnet>, accessed 7 April 2026.

⁶ RSA, Recognised Refugees 2025, p. 21.

⁷ refugee.info, How to declare your taxes in Greece, <https://greece.refugee.info/en-us/articles/7353917860893>, accessed 19 May 2026.

⁸ Decision A.1062 of the Director of the Independent Authority for Public Revenue of 9 March 2026, Form and Content of the Income Tax Return for the 2025 Tax Year, the Accompanying Forms and Supporting Documents. Form and Content of the Administrative/Corrective Assessment Notice for Tax Years from 2025 Onwards, ΦΕΚ Β 1280/09.03.2026, <https://www.kodiko.gr/nomothesia/document/1296910/a.a.d.e.-a-1062-2026>, accessed 16 March 2026.

Newly recognised beneficiaries of international protection or returnees therefore often do not yet have a current tax clearance certificate. This can delay applications for social benefits or the opening of a bank account.

AMKA and Access to the Healthcare System

The Greek social security number AMKA is another central document required for access to the labour market and healthcare, as well as for applying for support programmes such as HELIOS+ or the “Housing and Work for the Homeless” programme. According to a joint ministerial decision published in 2022, beneficiaries of international protection have one month after the issuance of their residence permit to complete the transition from the temporary social security number for asylum seekers (PAAYP A) to the AMKA.⁹ After this deadline expires, the PAAYP A is deactivated.

Since January 2025, the Ministry of Migration and Asylum has been designated as responsible for issuing AMKA to beneficiaries of international protection.¹⁰ However, in practice the Ministry has not yet assumed this responsibility. Accordingly, the authorities named in a circular of the Ministry of Labour and Social Security, EFKA and KEP, remain responsible for issuing AMKA.¹¹ According to information provided by both RSA and Meraki, as well as the author’s own experience, KEP does not issue AMKA in practice. Against this background, based on the information currently available, EFKA is the only authority that actually issues AMKA to beneficiaries of international protection.

A joint ministerial decision of December 2023 sets out in more detail the issuance and activation of an AMKA and the applicable requirements. Upon presentation of a valid residence permit, beneficiaries of international protection are issued an initially inactive AMKA by the competent authority.¹² They are exempt from the requirement to present a passport.

In order to activate the AMKA, beneficiaries of international protection must additionally prove that they are lawfully staying in Greece, have access to the labour market, and are actually residing in the country. In addition to proof of residence, the joint ministerial decision requires proof of employment or the commencement of a business activity for the person to be directly insured.¹³ Since the activation of AMKA for further family members can usually only take place through that person as indirectly insured family members, this effectively requires that at least one family member provide such proof of employment.

The AMKA is also automatically deactivated as soon as one of the activation requirements is no longer met. In particular, deactivation takes place automatically on the day after the residence permit expires, since the criterion of lawful residence is then no longer fulfilled.¹⁴

⁹ Joint Ministerial Decision 605869/2022, Arrangements to Ensure Access of Applicants for International Protection to Health Services, Medical and Pharmaceutical Care, Social Security and the Labour Market – Issuance of P.A.A.Y.P.A., ΦΕΚ Β 5392/18.10.2022, Art. 8, <https://search.et.gr/el/fek/?fekId=603960>, accessed 30 April 2026.

¹⁰ Joint Ministerial Decision Φ80320/109864/2023, Social Security Number, ΦΕΚ Β 7280/22.12.2023, Art. 18, <https://www.taxheaven.gr/circulars/45594/f80320-109864-14-12-2023>, accessed 30 April 2026.

¹¹ Circular Φ80320/25192 of the Ministry of Labour and Social Security of 1 April 2024, Guidance on the Assignment and Functioning of the Social Security Number (AMKA), pp. 25–26, https://www.e-fka.gov.gr/sites/default/files/2024-04/ΕΓΚΥΚΛΙΟΣ_AMKA_01.04.2024.pdf, accessed 30 April 2026.

¹² Joint Ministerial Decision Φ80320/109864/2023, Art. 4 para. 3 and Art. 11.

¹³ Ibid., Art. 6 para. 5: As proof of employment or the commencement of a business activity, one of the following documents is required: a confirmation of hiring from the employer, an employment contract uploaded to the ERGANI information system of the Ministry of Labour and Social Security, or a certificate of commencement of business activity from the tax administration.

¹⁴ Joint Ministerial Decision Φ80320/109864/2023, Art. 7 para. 2.

An activated AMKA is a prerequisite for access to the public healthcare system as well as to social benefits such as the guaranteed minimum income or disability benefit.¹⁵

In practice, beneficiaries of international protection face significant difficulties at several levels in relation to the issuance and activation of an AMKA.

With regard to issuance, the author's own practical experience, as well as reports from various organisations, consistently show that communication with EFKA staff often presents significant barriers. In particular, in many cases communication is almost impossible without knowledge of Greek or interpretation support.

In addition, Meraki and AFW report that in numerous cases EFKA staff do not issue an AMKA or request additional documents that are not legally required for this procedural step, such as proof of address or proof of employment. This is also confirmed by the author's practical experience in casework. Even letters prepared by organisations setting out the relevant legal provisions in Greek were unable to resolve these problems in some cases. Due to the limited capacity of civil society organisations, however, it is often not possible to accompany affected persons individually to appointments with the authorities, although such support would frequently be necessary based on the experiences described.

The requirement that proof of employment or the commencement of a business activity must be provided in order to activate an AMKA means in practice that a significant proportion of beneficiaries of international protection have no access to medical care through the public healthcare system.

A circular issued in November 2025 was intended to partially address this problem. It clarifies that certain groups of persons, including beneficiaries of international protection, may have access to medical care in public healthcare facilities even without an active AMKA.¹⁶

However, the circular links this access to the presentation of certain forms of proof. For beneficiaries of international protection, it specifically provides for written confirmation of a decision postponing removal. Such a document, however, is issued exclusively to third-country nationals who are staying irregularly in the country and whose removal is temporarily postponed. It is therefore systematically unavailable to beneficiaries of international protection.

In practice, this means that the possibility of access to healthcare provided for in the circular cannot in fact be used by beneficiaries of international protection, and that access therefore continues to depend primarily on an active AMKA.

This has significant practical consequences for beneficiaries of international protection, who often have to pay for medical treatment and medication themselves. According to reports by organisations such as Meraki and MSI, this also affects people with serious illnesses. For example, one case is known in which a beneficiary of international protection was unable to cover the costs of necessary chemotherapy. Meraki also reports further cases in which life-saving medication could only be obtained through social pharmacies with considerable effort and in which, without this support, life-threatening situations would have arisen. According to MSI, there are also numerous cases in which persons with chronic illnesses, psychiatric conditions or tuberculosis had no access to necessary treatment or medication because they did not have an active AMKA and could not cover the costs themselves.

¹⁵ Information provided to the author by KEM Thessaloniki in September 2025; and RSA, Recognised Refugees 2025, p. 28.

¹⁶ Circular Γ2δ/οικ.48556/03-11-2025 of the Ministry of Health, Access to Public Health Structures for Beneficiaries of Article 33 of Law 4368/2016, <https://www.taxheaven.gr/circulars/51433/g2d-oik-48556-03-11-2025>, accessed 7 April 2026.

In addition, several sources consistently report that there are further significant barriers to accessing the public healthcare system. A central problem is the lack of interpretation services. In public healthcare facilities, interpretation is generally not provided, meaning that persons without sufficient knowledge of Greek or English face significant difficulties in accessing medical care.

According to MSI, even making an appointment is often only possible through a Greek-language telephone hotline or an online platform available only in Greek. In practice, this means that affected persons often depend on support from third parties simply in order to book an appointment. Interpretation services are also generally unavailable during treatment, meaning that communication and understanding of the medical situation are significantly limited. Affected persons therefore often depend on the support of civil society organisations in order to arrange appointments, ensure communication and obtain access to treatment.

MSI reports that, due to structural overburdening of the healthcare system, medical consultations often last only a few minutes. Reports from practice consistently indicate that this leads to situations in which severely overburdened medical staff encounter patients who are ill but unable to communicate effectively about their condition or treatment. This places them in a particularly vulnerable position and makes effective treatment almost impossible.

Furthermore, access to social security systems such as the guaranteed minimum income and disability benefit is often blocked in practice. An active AMKA is a prerequisite for access to these benefits. As set out above, however, activation of the AMKA regularly requires proof of an employment relationship. This means that beneficiaries of international protection who depend on social support because of their economic or health situation are, precisely because of that situation, unable to meet the requirements for access to these benefits. While the guaranteed minimum income is intended to support people without earned income, persons with disabilities are often permanently dependent on corresponding benefits and may be unable to engage in employment.

In one case supported by the author, a returnee suffering from a serious chronic illness and regularly dependent on life-saving medical treatment was denied access to the guaranteed minimum income and disability benefit despite meeting the other requirements, because his AMKA was not active. Although two other family members were working informally, the income was barely sufficient to cover living and housing costs. They could not comprehend why social benefits were refused in their situation. As a result of the severe material hardship and frustration over the administrative barriers, the family eventually decided to leave Greece again, although they had previously already been returned from another EU Member State.

The requirements described above create a structural dependency in practice: without an activated AMKA, access to medical care and to central social benefits is significantly restricted. At the same time, activation of the AMKA requires proof of an employment relationship. For beneficiaries of international protection with health limitations or particular vulnerabilities, however, taking up employment is often not possible without first stabilising their living situation.

As a result, affected persons effectively remain in a situation in which the requirements for activating the AMKA cannot be met, while at the same time central integration and support services are inaccessible without an activated AMKA.

Unemployment Card

In Greece, the unemployment card is issued by the Public Employment Service (DYPA) to persons who have access to the labour market, are currently not employed and are actively seeking

employment. Having an unemployment card is, among other things, a prerequisite for registration in the HELIOS+ programme and, for unemployed persons, for opening a bank account.

The application is submitted via the DYPA website. Once it has been successfully submitted, the unemployment card can be issued directly online. However, this requires that the person concerned either already has login credentials for the DYPA portal or can identify themselves using Taxisnet login credentials in combination with an AMKA.¹⁷ DYPA's official website does not indicate that there is any procedure for the first-time issuance of the unemployment card other than an electronic application.

The unemployment card is therefore effectively accessible only to persons who have the relevant DYPA or Taxisnet login credentials in combination with an AMKA. In addition, using the platform in practice requires good knowledge of Greek, as the website is available only in Greek. Furthermore, based on the author's own experience, the website is difficult to navigate and requires knowledge of both the occupational and educational categories used in Greece and specific categories of unemployed persons. These categories are not sufficiently explained either on the website itself or in the available information materials.¹⁸

Under these conditions, beneficiaries of international protection face significant access barriers which, in many cases, are extremely difficult to overcome without support. This applies even more to returnees, especially where they do not have, or no longer have, access to AFM, AMKA and Taxisnet. At the same time, due to limited capacity, support from civil society organisations is often restricted to particularly vulnerable persons and urgent cases.

Bank Account

Access to a bank account is an essential prerequisite for access to the formal labour and housing market. In practice, a Greek bank account is regularly required both for taking up legal employment and for renting housing. Salary payments¹⁹ and rent payments²⁰ are legally required to be made by bank transfer.

According to a decision of the Bank of Greece, certain identity and contact details must be proven by official documents in order to open a bank account.²¹ These include, in particular, information on name and family status, identity documents, date and place of birth, current residential address, contact details, information on professional activity, as well as a tax identification number (AFM) and a specimen signature.

In addition, an information guide issued by the Ministry of Migration and Asylum states that beneficiaries of international protection are generally required to submit the following documents: a valid residence permit, proof of residential address (e.g. a registered rental contract, a declaration by a host or a utility bill), proof of a telephone number registered in the person's name and, depending on employment status, either a certificate of employment and an employment contract or an

¹⁷ DYPA, Registration in the Digital Unemployment Register of DYPA – Unemployment Card, Greek-language website, <https://www.dypa.gov.gr/eggraph-sto-mhtroo-anergon-deltia-energias>, accessed 14 April 2026.

¹⁸ O.A.E.D. (predecessor authority of DYPA), Instructions for Issuing an Unemployment Card, in Greek, n.d., <https://www.dypa.gov.gr/storage/elina/odighies-hlektroniki-eghghrafi-v8-1.pdf>, accessed 8 April 2026; DYPA, Greek-language YouTube video of November 2023, Instructions for Issuing an Unemployment Card, https://www.youtube.com/watch?v=n_uznM90xjY, accessed 8 April 2026.

¹⁹ Law 4387/2016, Unified Social Security System – Reform of the Insurance and Pension System – Income Tax and Gambling Regulations and Other Provisions, ΦΕΚ Α 85/12.05.2016, Art. 38 para. 10.

²⁰ Law 5222/2025, National Customs Code and Other Provisions – Pension Provisions, ΦΕΚ Α 134/28.07.2025, Art. 210, <https://www.taxheaven.gr/law/5222/2025>, accessed 18 March 2026.

²¹ Decision ΕΤΠΘ 281/5/17.3.2009 of the Banking and Credit Committee of the Bank of Greece, Prevention of the Use of Credit Institutions and Financial Organisations Supervised by the Bank of Greece for Money Laundering and Terrorist Financing, Section 5.5, <https://www.taxheaven.gr/circulars/14007/etpo-281-5-17-3-2009>, accessed 7 April 2026.

unemployment card. In addition, the submission of an AFM and a tax clearance certificate, or a solemn declaration that no tax return has to be submitted in Greece, is required.²²

The formal requirements for opening a bank account are often difficult for beneficiaries of international protection to meet. In particular, proof of residential address constitutes a significant barrier in informal housing situations. Based on the author's own experience and reports from practice, proof of address can in some cases only be obtained through informal channels and against payment. Proof of income is also generally only available in cases of formal employment. In cases where opening an account without proof of income is possible, the submission of an unemployment card is often required, obtaining which, as set out above, is itself associated with further obstacles.

In practice, additional requirements that go beyond the formal rules are also frequently imposed when opening bank accounts. Through exchanges with other organisations, the author has consistently received feedback that many banks require proof of a regular source of income and often do not open bank accounts if no employment contract is available. RSA and Meraki also report that residence permits are not always accepted as sufficient identity documents and that a passport or travel document is requested instead.

In addition, in individual cases, requirements are imposed that are difficult to understand or are not provided for. For example, it was reported that, in order for an interpreter to be present, a bank required not only an official authorisation with a verified signature, but additionally required the interpreter to already hold an account with the same bank.

From the author's own experience and reports by organisations, it is also known that, in practice, specific bank branches refuse to open accounts for beneficiaries of international protection. This means that people have to actively look for bank branches considered to be "accessible". Opening a bank account is also generally only possible with knowledge of Greek or English or with corresponding support. Several organisations report that the successful opening of an account is often only possible if affected persons are accompanied by third parties who insist that bank staff comply with the legal requirements.

Counselling practice repeatedly shows that, when opening a bank account, beneficiaries of international protection are told that certain payments are required, although these are in fact optional additional products, in particular insurance policies. Such products are often taken out without those affected understanding their nature or that they are optional.

In summary, opening a bank account for beneficiaries of international protection is associated with significant practical obstacles. In addition to the submission of numerous documents and forms of proof, language skills, knowledge of administrative procedures and support from third parties are often required, without which successfully opening an account is in many cases not possible.

AMA

Together with a bank account, the insurance registration number (AMA) is a central prerequisite for taking up legal employment. According to the EFKA website, in order for an AMA to be issued, registration in the register of insured persons must be applied for at a regional EFKA office. For this purpose, beneficiaries of international protection must present a social security number (AMKA), a tax

²² Ministry of Migration and Asylum / UNHCR, Information Guide for Beneficiaries of International Protection, December 2023, p. 20, https://migration.gov.gr/wp-content/uploads/2024/04/ENGLISH_BROCHURE.pdf, accessed 7 April 2026.

identification number (AFM), a valid residence permit, proof of a concrete start of employment, and a bank account held in their name.²³

Even these formal requirements are difficult for many beneficiaries of international protection to meet in practice. RSA and Meraki also report significant practical obstacles in the application process. For example, proof of fixed accommodation is regularly required as part of the procedure, such as a registered rental contract, an electricity or water bill in the applicant's name²⁴ or a solemn declaration by the host.

According to Meraki, due to cases of misuse in which forged solemn declarations were submitted, some EFKA offices no longer accept such declarations. In practice, this can mean that a formal rental contract often remains the only usable proof of accommodation. This creates a structural circular barrier: in practice, concluding a rental contract often requires income or employment, while at the same time an AMA, and thus the possibility of legal employment, cannot be obtained without corresponding proof of accommodation.

In addition, returnees regularly lack even the basic requirements for applying. Residence permits have often expired or been lost by the time of return, and AMKA or AFM were in some cases never issued or are no longer available. In such cases, the missing documents must first be issued or recovered, which, according to reports from several organisations, is a complex and lengthy procedure.

For many beneficiaries of international protection, especially returnees, applying for an AMA is therefore associated with significant administrative obstacles. At the same time, the AMA is of central importance for legal employment. Precisely because several other documents and forms of proof must already be available before an AMA can be applied for, the absence of these prerequisite documents and additional practical requirements significantly impede access to the formal labour market.

Renewal of the Residence Permit

Under the Asylum Code, the application for renewal of the residence permit must be submitted no later than 30 days before expiry, as otherwise a fee of EUR 100 is imposed.²⁵ As described on the website of the Ministry of Migration and Asylum, renewal is a two-stage procedure. First, approval for renewal must be requested by email from the asylum unit of the Greek Asylum Service based in Athens that is responsible for beneficiaries of international protection. Once approval has been granted, an application for issuance of the residence permit must then be submitted to the Passport Office of the Foreigners Police.²⁶

In practice, this process, particularly the first step, is very lengthy and often results in significant periods during which beneficiaries of international protection do not hold a valid residence permit despite having submitted their application on time. During the author's practical work in Greece, approval for renewal was regularly granted only six months or more after the residence permit had expired. The author is aware of a number of cases in which approval was granted twelve months or more after the residence permit had expired. In several such cases, the author intervened with the competent asylum unit of the Greek Asylum Service.

²³ EFKA, Register of Insured Persons, Greek-language website, <https://www.e-efka.gov.gr/el/sychnes-eroteseis/asphalisi-eisphores/asphalismenoi/metreo-asphalismenon>, accessed 26 March 2026.

²⁴ This also requires an officially registered rental contract.

²⁵ 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, ΦΕΚ Α 111/10.6.2022, Art. 23 para. 1.

²⁶ Ministry of Migration and Asylum, Residence Permits, section "How to renew your residence permit", <https://migration.gov.gr/en/gas/aitoyntes-kai-dikaioychoi/adeies-diamonis/>, accessed 9 April 2026.

The reasons for these significant delays lie not only in the limited staffing of the competent asylum unit,²⁷ but also in the extensive checks carried out before approval is granted. According to staff members of that asylum unit, these background checks involve coordination with other authorities, in particular the police. In the course of this coordination, lengthy delays regularly occur which, based on the author's own experience, often cannot be substantially shortened even through interventions.

The consequences of these delays are significant. When the residence permit expires, the AMKA is automatically deactivated, which may impair both the continuation of legal employment and access to healthcare. At the same time, numerous other procedures are effectively blocked during the renewal process or depend on whether individual authorities accept temporary certificates.

A few days before their residence permit expires, beneficiaries of international protection can apply to the Asylum Service for a certificate which, together with the expired residence permit, is intended to serve as proof of identity.²⁸ According to RSA, however, this document is frequently not accepted by authorities,²⁹ which can also be confirmed by the author's experience. In addition, problems regularly arise when presenting this temporary certificate to banks, employers or landlords. In practice, this means that, although they are not responsible for the delay, many beneficiaries of international protection spend this period without a residence permit that is recognised as valid and face significant difficulties as a result. Access to fundamental rights is therefore in some cases considerably impeded or effectively prevented.

Returnees are often particularly affected by this, as their residence permits frequently have to be renewed or reissued due to loss or expiry. At the same time, central steps such as opening a bank account or taking up employment are, in practice, significantly impeded or almost impossible without a recognised valid residence permit.

In addition, Greek residence or travel documents are repeatedly not handed over to returnees by the authorities of the returning state before return. Recovering these documents after return is often complex, may lead to considerable delays and is generally not possible without support. The author is aware of this from direct observation in a number of cases, and it is also confirmed by reports from RSA.³⁰

Conclusion

The requirements described above show that, in practice, obtaining central documents is often far from straightforward. Even where individual requirements are provided for by law, actually fulfilling them is frequently made considerably more difficult, or is only possible with extensive support, due to administrative barriers, contradictory requirements and practical problems.

Access to central documents such as an AFM, AMKA, Taxisnet access, a bank account or an AMA often presupposes the availability of further documents or forms of proof. The structural interdependencies that arise from this are examined in more detail in the following chapter.

Returnees are particularly affected, as they often return to Greece without current or complete documents. Expired or lost residence permits, AFM and AMKA numbers that were never issued or are no longer accessible, and the absence of a bank account or other basic forms of proof mean that several central procedures cannot be initiated or completed. Recovering or obtaining these

²⁷ RSA / Stiftung Pro Asyl, Beneficiaries of International Protection in Greece: Access to Documents and Socio-Economic Rights, March 2024, pp. 8–9, https://rsaegan.org/wp-content/uploads/2024/04/2024-03_RSA_BIP.pdf, accessed 20 April 2026.

²⁸ According to the author's observations, this certificate is now issued comparatively quickly and reliably, unlike in the past.

²⁹ RSA, Recognised Refugees 2025, pp. 15–16.

³⁰ RSA, Beneficiaries of International Protection in Greece, 2024, p. 5.

documents is often complex, time-consuming and almost impossible without support from third parties.

Overall, this means that, despite existing legal entitlements, beneficiaries of international protection, especially returnees, often do not have effective access in practice to fundamental rights, the labour market, the healthcare system or social protection.

Chapter 2: Structural Obstacles in Obtaining Documents

Introduction

Chapter 1 set out the central documents and administrative requirements that beneficiaries of international protection need in order to access legal employment, housing and healthcare. This chapter examines these requirements together and considers the structural obstacles that arise from their interaction. In particular, it addresses why the process of obtaining documents is often not linear in practice, and whether beneficiaries of international protection and returnees can obtain the required documents while living in informal or precarious circumstances.

Overarching Difficulties in Obtaining Documents

UNHCR's Protection Monitoring for Greece indicates that access to central documents for beneficiaries of international protection continues to be marked by gaps in practice. According to this monitoring, only 68% had an AMKA, 61% had a bank account and fewer than half had an AMA.³¹ This suggests that the difficulties in accessing central documents are not merely isolated cases, but reflect broader structural problems.

In practice, these difficulties arise in particular from the limited availability and usability of information, from a lack of knowledge among individual authorities of the legal framework applicable to beneficiaries of international protection, and from complex and interdependent procedures.

Limited Availability of Information and Support

Based on the author's experience, detailed, practice-oriented information on the relevant procedures that is accessible to those affected, in particular on which documents are required in each case and how they can actually be obtained, is available only to a limited extent. Even where information exists, it is often not sufficient to successfully navigate the complex and inconsistently applied procedures without individual support.

At the end of 2023, an information guide was published by the Ministry of Migration and Asylum in cooperation with UNHCR, covering central thematic areas such as AFM, AMKA, bank accounts and AMA.³² However, the information contained in it remains largely general and provides little guidance for dealing with the difficulties that arise in practice. Further information on the thematic areas mentioned is often provided merely through external links to Greek-language websites, which are therefore of limited use to many beneficiaries of international protection. In addition, it is apparent that some of the information provided in the guide does not correspond to actual administrative practice. For example, it lists the issuance of AMKA by KEP,³³ although, according to consistent reports from practice, this option is not in fact implemented (see the section AMKA and Access to the Healthcare System in Chapter 1).

In addition, information is provided by civil society initiatives such as refugee.info or Mobile Info Team. Based on the author's experience, however, such information services often cannot replace individual support, particularly in complex procedures involving numerous exceptions, intermediate steps and inconsistent administrative practice. The information provided cannot cover every aspect. As a result, even useful information services offered by civil society organisations can only partially mitigate the difficulties involved in navigating such procedures in practice.

³¹ UNHCR, Greece Protection Monitoring of Refugees - Key Findings 2024, p. 2, <https://data.unhcr.org/en/documents/details/115178>, accessed 26 March 2026.

³² Ministry of Migration and Asylum / UNHCR, Information Guide for Beneficiaries of International Protection, December 2023, https://migration.gov.gr/wp-content/uploads/2024/04/ENGLISH_BROCHURE.pdf, accessed 7 April 2026.

³³ Ibid., p. 18.

The individual case support often required for complex procedures is currently provided by civil society organisations only to a very limited extent, which is also linked to funding shortages and cuts. This is evident, for example, in the case of the Greek Council for Refugees (GCR), one of the most established organisations providing legal counselling to beneficiaries of international protection in Greece. In a strike call of 29 January 2026, employees of the organisation referred to a large-scale wave of dismissals, the closure of the Thessaloniki branch after 15 years, and the end of its presence in the Evros region.³⁴ UNHCR also refers, with regard to Greece, to a funding crisis that has affected legal aid services alongside other important support services.³⁵

Lack of Knowledge of the Legal Framework for Beneficiaries of International Protection

Based on the author's experience, banks and authorities such as EFKA or the tax authority AADE, which do not regularly deal with beneficiaries of international protection, are often unfamiliar with the specific legal framework applicable to this group. In practice, this repeatedly leads to additional documents or requirements being requested which may be relevant for other groups, such as Greek nationals or other third-country nationals, but are not legally required for beneficiaries of international protection.

This can result in inconsistent treatment of comparable cases, as the outcome of a procedure may then depend not only on the formal legal situation, but also on the knowledge of the competent authority and how the individual case is handled. As a result, procedures are often difficult to predict for those affected. Depending on the competent authority, different and sometimes difficult-to-meet requirements may be imposed.

The author regularly received similar feedback in counselling practice, in particular in connection with procedures before EFKA, such as the issuance or activation of AMKA and AMA, as well as the opening of bank accounts with different banks. Reference is made to the relevant sections in Chapter 1 for the individual practical requirements and examples.

In addition, in the course of his work in Greece, the author repeatedly received reports from organisations as well as from beneficiaries of international protection themselves that authority or bank staff displayed dismissive behaviour towards beneficiaries of international protection. In individual reports, behaviour perceived as discriminatory was also described. Overall, this makes the actual implementation of the procedures additionally difficult for beneficiaries of international protection and means that it may diverge from the formal legal framework.

Complex and Interdependent Procedures

The relevant procedures are often complex and require not only knowledge of the formal requirements, but also experience with the relevant administrative practice. Rather than involving only individual, separate access barriers, they form an interlocking system of dependencies in which the absence of one document has direct consequences for a range of further procedures. The required documents largely depend on one another: for example, an unemployment card is often required so that unemployed beneficiaries of international protection can open a bank account. In order to apply for the unemployment card, an AMKA and Taxisnet login credentials are in turn generally necessary. Access to Taxisnet requires an AFM, and an AMKA requires a valid residence permit.

In practice, this frequently creates circular situations in which affected persons cannot meet certain requirements because they lack precisely the documents that they could only obtain by meeting those

³⁴ Efsyn, Greek Council for Refugees - Work Stoppage on Thursday, Greek-language media report of 27 January 2026, https://www.efsyn.gr/ellada/dikaiomata/498865_elliniko-symboyllo-gia-toys-prosfyges-stasi-ergasias-tin-pempti, accessed 21 April 2026.

³⁵ UNHCR, Greece Bi-annual Factsheet February 2026, <https://data.unhcr.org/en/documents/details/121723>, accessed 21 April 2026.

requirements. These interdependencies mean that individual problems reinforce one another, and that access to fundamental rights cannot simply be achieved step by step, but only with significant difficulty or with external support.

Case Examples

The cases described below illustrate why obtaining the documents required for access to the labour and housing market often fails in practice, is delayed over longer periods, or succeeds only under specific supportive circumstances.

After his return to Greece, Interviewee 9 had to wait 18 months for the renewal of his residence permit. During this period, according to his own account, it was not possible for him to obtain an AMKA, Taxisnet login credentials or a bank account. Two years after his return, he had only an AFM, while other central documents were still missing. He also stated that he saw no realistic possibility of obtaining free support in acquiring these documents. Due to his financial situation, he was also unable to use paid private agencies that offer such support.

Similarly, Interviewee 4 reported that more than one year after his return, he had neither an AFM, nor Taxisnet login credentials, nor an AMKA. He, too, was unable to afford the costs charged by private agencies for assistance with obtaining documents. According to his account, this meant that at the time of the interview he was still effectively denied access to the healthcare system as well as to legal employment and the formal housing market.

It is not only the absence of documents, but also individual procedural steps that can block the acquisition of further documents. For example, proof of a fixed residential address is regularly required for various procedures, particularly in connection with applying for an AMA. For persons living in precarious or informal housing situations, such proof is often unavailable. Interviewee 3 stated that, because of these requirements, he had been forced to obtain an inaccurate solemn declaration concerning his accommodation situation in exchange for payment. According to his account, he paid a total of around EUR 700 to private agencies in order to obtain the documents necessary for taking up legal employment.

Proof of address also constitutes a practical barrier in connection with the renewal of residence permits. Interviewee 5 reported that he was initially unable to submit a renewal application because he was homeless and could not provide an address. Only after a lengthy search did he find a person who allowed him to use their address for the application.

By contrast, individual cases show that obtaining the required documents is possible in principle, but in practice is regularly linked to specific supportive factors. The case of Interviewee 1 shows that obtaining the required documents may in practice depend substantially on external support. Upon her return, she only had an AFM and was able to obtain further documents such as an AMKA, Taxisnet access, AMA and a bank account only after several months and only through the continuous support of social workers at the accommodation where she was staying.

Interviewee 2 was also able to obtain the required documents only with external support. In his case, however, this support was provided by an employer. Because of his previous experience in skilled manual work, he was hired by a business which then supported him in obtaining the necessary documents. There are strong indications that his previous occupational experience and the fact that he was immediately ready and able to work contributed significantly to this support. The case illustrates that obtaining the required documents in practice depends not only on the formal requirements, but is also influenced by individual factors such as qualifications, proximity to the labour market and existing support structures.

Conclusion

Overall, the cases described show that obtaining the documents required for access to the labour and housing market often succeeds in practice only with external support and frequently only after extended periods. Without support from organisations or paid private agencies, many affected persons are unable to successfully complete the required procedures.

Experience from counselling practice shows that complex procedures, inconsistent decisions and a lack of information often delay or even prevent the acquisition of these documents. In particular where several problems coincide, such as missing documents, precarious or informal housing situations, long delays in the renewal of residence permits and lack of financial resources, returnees may remain for more than one year without the necessary prerequisites for legal employment or renting housing legally.

At the same time, it remains necessary to examine whether, even where documents are successfully obtained, the transition into stable legal housing and employment is possible or whether it fails due to practical, formal or systemic obstacles. This is examined in more detail in the following chapters on access to accommodation and employment. The question of obtaining documents therefore cannot be considered in isolation. For the practical assessment, the decisive point is that documents are necessary, but do not necessarily guarantee access to the formal housing market and the legal labour market.

Section II: Accommodation and Homelessness

Chapter 3: Access to the Formal Rental Market

Introduction

For beneficiaries of international protection, access to housing through the formal rental market constitutes a central step towards independent living. It enables greater independence from state or civil society support structures and forms an important component of social and economic integration. It is therefore important to assess whether beneficiaries of international protection, and returnees in particular, can actually access the regular housing market in Greece. This chapter sets out the formal and practical requirements for renting housing, the requirements imposed by landlords, and the cases identified in the course of the research in which housing was rented legally.

Formal Requirements

In Greece, legally renting an apartment requires, in particular, an AFM, access to the Taxisnet tax portal, and a bank account. Since 1 January 2026, rent payments are legally required to be made through a bank account.³⁶

In practice, returnees often do not have the documents or login credentials required for this. If an AFM has not yet been issued, has been lost, or Taxisnet credentials are no longer available, additional steps with the authorities are regularly required. Opening a bank account is also often difficult, as banks frequently require forms of proof that returnees, especially immediately after return, often cannot provide, such as proof of address, proof of employment, or a valid residence permit. Meeting these formal requirements alone can therefore considerably impede access to a legal tenancy. Further information on this can be found in Chapter 1.

For example, Interviewee 6 and her sister attempted to rent an apartment legally after their return in order to be able to receive rent subsidies from HELIOS+. However, this failed not only because they could not raise the required upfront costs for the first month's rent, the deposit and estate agent fees, but also because they were unable to open a bank account. For this, the banks required not only proof of income, but also a registered residential address. They could not provide such an address because they were only living in temporary accommodation provided by a non-state initiative. Even with the support of a social worker, this obstacle could not be overcome.

Rental Costs and Proof of Income

Due to rising rental and living costs, landlords in practice often require proof of a fixed income or a stable employment relationship before they are willing to rent to beneficiaries of international protection. In this way, they seek to minimise the risk of non-payment. This was reported by AFW, confirmed by Interviewee 8 in connection with his search for housing in Thessaloniki, and is also consistent with the author's observations.

For returnees in particular, this constitutes a significant barrier in the first months after return, as they regularly do not have a secure income during this period. Even beyond this initial phase, precarious, low-paid or informal employment makes it difficult for many beneficiaries of international protection to meet landlords' expectations.

In addition, rents in Greece have risen sharply in recent years. In Athens, increases between 2019 and 2025 averaged around 37.8%, and in some neighbourhoods reached up to approximately 55%.³⁷

³⁶ Law 5222/2025, Art. 210.

³⁷ eKathimerini.com, Rents Have Soared Since 2019, media report of 23 July 2025, <https://www.ekathimerini.com/economy/1276098/rents-have-soared-since-2019/>, accessed 18 March 2026.

Against this background, renting an apartment without a stable and adequately paid job or without significant savings is in practice unrealistic for many beneficiaries of international protection and returnees.

Several interviewees reported that legally renting an apartment was financially impossible for them. Interviewee 1 works in an underpaid restaurant job and earns EUR 450, which is just enough to cover the minimum rent for an apartment, leaving no funds for utilities, food or other necessary daily expenses. Interviewees 4 and 9 also stated that they could only afford accommodation in unofficial hostels or shared apartments.

Overall, these financial conditions show that access to legal housing often fails even where individual formal requirements are met. Without a sufficiently high and reliable income, returnees regularly have no realistic prospect of renting an apartment legally.

Informal Tenancies

Where renting a place formally is not possible, beneficiaries of international protection sometimes resort to informal tenancies. Two interviewees were able to find accommodation themselves, but without an officially registered rental contract and therefore without legal protection. Interviewee 5 had to incur debts of more than EUR 4,000 for this purpose. Interviewee 7 is struggling with the ongoing rental costs and is urgently looking for a second job in order to be able to continue paying the rent.

AFW also reported individual cases of informal housing rental in which residents were confronted after moving in with high and unjustified or unclear additional payment demands or allegedly outstanding bills. In the cases described, residents were pressured to pay these amounts by being told that the water or electricity supply might be cut off, or by being threatened with the loss of their accommodation. AFW described the underlying structures as “mafia-like”.

These cases show that informal or insufficiently secured tenancies may make accommodation possible in individual cases, but are associated with significant financial risks and a lack of legal protection.

Case Examples

Interviewee 8 was able to legally rent an apartment after his return from Germany. Among all interviewees, he was by far in the strongest position: he had an AFM, Taxisnet access, AMKA, a Greek bank account, a valid residence permit and good knowledge of Greek. He also already had work experience in Greece.

Despite these favourable conditions, the search for housing was only successful with great effort. He contacted numerous friends, acquaintances and agencies and was ultimately able, through an agency, to convince a landlord to rent an apartment to him - on the clear condition that he had to find work as soon as possible. He was also unable to cover the deposit and estate agent fee from his own funds and had to borrow the money from an organisation. After two months of intensive searching, however, he had not managed to find employment, so he was ultimately forced to give up the apartment again.

Interviewee 2 was also ultimately able to legally rent an apartment. However, this only became possible after he had gone through a longer period of precarious housing and working conditions and, more than one year after his return, had been formally employed by his employer. His previous professional experience in skilled manual work helped him in this regard. The case supports the assessment that returnees generally do not have a realistic short-term prospect of accessing legal housing, and that access to legally rented housing often becomes possible only after a longer period

of stabilisation and under favourable individual circumstances. Both cases also show that stable employment is a central prerequisite for this.

Rejection and Reservations by Landlords

Another major obstacle to renting housing legally is the widespread rejection of beneficiaries of international protection by landlords. Three organisations and four interviewees gave consistent accounts of this.³⁸ The reasons given included both discriminatory attitudes towards foreign nationals and specific reservations about beneficiaries of international protection as tenants.

The social worker from NAOMI, who regularly supports beneficiaries of international protection in their search for housing, reported that the large majority of landlords reject such inquiries at the first contact. In his assessment, this is based, among other things, on widespread assumptions that beneficiaries of international protection would only rent for a short period, would not comply with rental contracts, or would leave unpaid bills behind. In his experience, even higher rent offers or personal mediation are often not sufficient to overcome this rejection. This underlines that access to legal housing often fails due to entrenched reservations on the part of landlords, even where external support is available.

Conclusion

Access to legal housing is significantly impeded for beneficiaries of international protection, and especially for returnees, by the combined effect of formal, financial and structural barriers as well as rejection and reservations on the part of landlords. High rents, the requirement to make payments through a bank account, and the widespread expectation of a fixed income or stable employment relationship make renting housing legally in practice unrealistic for many returnees.

Even persons with favourable prerequisites and extensive support encounter significant difficulties in renting or permanently maintaining an apartment. Overall, it becomes apparent that the legal housing market is accessible to returnees only in exceptional cases and under particularly favourable circumstances.

³⁸ Cribs, Wave, NAOMI, and Interviewees 2, 5, 6 and 8.

Chapter 4: Accommodation of Returnees in Camps for Asylum Seekers

Introduction

This chapter addresses the question of whether beneficiaries of international protection can be readmitted to camps for asylum seekers after returning to Greece or whether they are informally tolerated there. This issue is examined because some court decisions assume that returnees could request extraordinary accommodation in facilities for asylum seekers.

For example, in its judgment of 11 September 2025, the Swiss Federal Administrative Court states that beneficiaries of international protection could, after returning to Greece, approach the asylum authorities again and request extraordinary accommodation in an asylum accommodation facility.³⁹ The Court does not cite any source or evidence of a corresponding practice for this assumption.

Legal Basis

Under the current legal framework in Greece, persons who have been granted international protection must leave the accommodation provided to them under the reception system no later than 30 days after recognition.⁴⁰ No legal basis is apparent for the readmission of beneficiaries of international protection to accommodation facilities for asylum seekers.

Administrative Practice

Under the applicable law, the Department of Transfers, Notifications and Exit (Τμήμα Μετακινήσεων, Επιδόσεων και Εξόδου) of RIS is responsible for coordinating transfers and allocations to reception and accommodation structures for asylum seekers.⁴¹ RIS also confirmed to the author by telephone that this department is responsible for allocations to camps. Following the termination of the ESTIA programme at the end of 2022, camps are the only remaining form of accommodation provided for asylum seekers within the Greek reception system.⁴²

In an email dated 11 March 2026, the competent department informed the author that beneficiaries of international protection are not admitted to the “controlled temporary accommodation facilities for asylum seekers”, that is, the corresponding camp structures. Beneficiaries of international protection who are already staying in these facilities must leave them within the time limit prescribed by law.⁴³

RSA further reports that it submitted requests to RIS for accommodation in camps for returnees. In all cases, such requests were rejected.

This general practice must be distinguished from the bridging programme for beneficiaries of international protection returning from Germany, which is described in more detail in Chapter 15. Where participants in this programme are temporarily accommodated in a camp after their return, this does not constitute a generally accessible readmission of beneficiaries of international protection to the Greek reception system, but rather a narrowly limited special arrangement within the framework of a programme funded by the European Commission.

Informal Toleration

In the course of this research, no indications were found that beneficiaries of international protection are informally tolerated in camps for asylum seekers. All five organisations that commented on this

³⁹ Federal Administrative Court (Switzerland), D-2590/2025, judgment of 11 September 2025, p. 21, <https://www.refworld.org/jurisprudence/caselaw/chefs/2025/151194>, accessed 12 May 2026.

⁴⁰ Law 4939/2022, Art. 109.

⁴¹ Presidential Decree 106/2020, Organisation of the Ministry of Migration and Asylum, ΦΕΚ Α 255/23.12.2020, Art. 37 para. 3 lit. e.

⁴² AIDA, GCR, ECRE, Country Report Greece: Update on 2024, September 2025, p. 180, https://asylumineurope.org/wp-content/uploads/2025/09/AIDA_GR_2024-update.pdf, accessed 12 May 2026.

⁴³ The full email in the original and in English translation can be found in Annex 4.

issue in the course of this research (RSA, ISS, Meraki, AFW and LWB) confirmed that, in practice, beneficiaries of international protection are neither readmitted to camps nor informally tolerated there. The author is also not aware of any case from the past two years in which a person was accommodated again in a camp after recognition of international protection or was informally tolerated there, apart from the individual case described below.

Only Interviewee 2 stated in his interview that, after his return at the end of 2024, an organisation had submitted an accommodation request and that he was subsequently accommodated for four months in a camp for asylum seekers on the mainland, until his Greek residence permit and travel document were issued. According to his account, this temporary accommodation was possible because the positive asylum decision had been issued while he was in Germany and he had therefore not previously been able to apply for the issuance of a residence permit or travel document. He also stated that the camp conditions were not suitable for living there.

This case cannot be understood as evidence of a general possibility for beneficiaries of international protection to be readmitted to camps for asylum seekers. According to the interviewee's account, the temporary accommodation was instead linked to a particular constellation, namely that the positive asylum decision had been issued while he was in Germany and that he had therefore not previously been able to apply for the issuance of a residence permit or travel document. According to his account, the accommodation served only to bridge the period until these documents were issued. It does not indicate any possibility available generally or on a regular basis for returnees.

According to the available information, such an arrangement is also no longer possible. According to several reports, since May 2025 the leadership of the Ministry of Migration and Asylum has strictly enforced the statutory 30-day deadline by which beneficiaries of international protection must leave camps for asylum seekers after being granted international protection.⁴⁴ Previously, there had been some known exceptions in which beneficiaries of international protection were able to remain temporarily in camps beyond this deadline. This development forms part of an overall restrictive administrative practice by the Ministry and currently makes it appear impossible for beneficiaries of international protection to be accommodated in such facilities after returning to Greece.

Conclusion

In summary, there is neither a legal basis nor a corresponding administrative practice for admitting returnees to camps for asylum seekers. Nor are there any indications of informal toleration according to the available findings. The only case identified is an atypical individual case from 2024, which cannot be understood as evidence of a general practice and is no longer possible under current administrative practice.

⁴⁴ Mobile Info Team, The Ministry of Migration and Asylum must rescind the eviction order of people on the move from camps, joint statement by 35 organisations of 4 June 2025, <https://www.mobileinfoteam.org/joint-statement-camp-evictions>, accessed 18 March 2026; Efsyn, Mass Evictions from Refugee Accommodation Facilities Are Being Prepared, Greek-language media report of 6 May 2025, https://www.efsyn.gr/ellada/dikaionomata/471399_etoimazoy-n-mazikes-exoseis-apo-tis-prosfygikes-domes, accessed 18 March 2026.

Chapter 5: Homeless Shelters

Introduction

Homeless shelters and emergency overnight shelters may be considered a possible safety net where beneficiaries of international protection have no access to their own housing, state accommodation or civil society support. This chapter therefore examines whether beneficiaries of international protection, and returnees in particular, have a realistic prospect of access to municipal or state-supported homeless shelters in Greece. It sets out the legal framework, available places and known cases in which admission was granted, as well as the admission conditions.

Legal Framework

A ministerial decision from 2016 regulates the minimum requirements for structures providing support services to homeless persons, including night shelters and transitional housing facilities. According to this decision, admission requires that the person concerned be considered homeless within the meaning of the decision and be self-sufficient. In addition, the person must prove by means of a medical certificate that they do not suffer from an airborne disease. Furthermore, there must be no serious mental disorder which, according to the assessment of a cooperating psychiatric service, makes admission to the facility impossible.⁴⁵

Available Places and Known Cases

Reliable, nationwide consolidated figures on the total number of places actually available in municipal or state-supported homeless shelters could not be identified in the course of this research. The Ministry of Labour and Social Security does provide a list of existing structures.⁴⁶ However, according to the consistent information from the organisations interviewed, the mere existence of such structures does not allow any conclusion to be drawn regarding the actual availability of places for beneficiaries of international protection or returnees. The key point rather is that the existing capacities fall far short of the need and that the facilities are regularly full.

RSA reports that the system has long been overburdened, that free places are only rarely available, that long waiting lists are used, and that inquiries often remain unanswered. LWB and ISS also state that written accommodation requests to several homeless shelters were regularly not answered and that the facilities operate at capacity and have no free places.

According to Meraki, which works daily with homeless beneficiaries of international protection and returnees and regularly tries to place them in homeless shelters, beneficiaries of international protection also compete with the general homeless population for an already insufficient number of places. The shelters are open not only to beneficiaries of international protection, but also to Greek nationals and migrants. According to Meraki, the available places are far from sufficient to meet the actual need for accommodation.

According to the information available, accommodation may in practice be available at most to particularly vulnerable beneficiaries of international protection who meet the high access requirements, such as women who are acutely affected by domestic or sexual violence. For other beneficiaries of international protection, such as single young and healthy men or women without specific experiences of violence, there is no realistic prospect of admission. According to Meraki, families and single parents are also not admitted to most shelters for safety reasons. In Meraki's

⁴⁵ Joint Ministerial Decision Δ23/οικ.19061–1457, Establishing a Framework of Minimum Standards for Structures Providing Services to Homeless Persons, ΦΕΚ Β 1336/12.05.2016, Art. 6 para. 2 and Art. 7 para. 2.

⁴⁶ Greek Ministry of Labour and Social Security, General Secretariat for Social Solidarity and Combating Poverty, Structures and Services, Greek-language website, <https://www.astegoi.gov.gr/index.php/en/gia-polites/domes-ypiresies>, accessed 14 April 2026.

assessment, there is in practice no functioning emergency accommodation for the vast majority of beneficiaries of international protection.

In the course of this research, only one case was identified in which a returnee was able to stay in a homeless shelter. In a case supported by Meraki, a returnee who spoke fluent English and some Greek was accommodated in a homeless shelter. This exception, however, does not establish a general realistic prospect of accommodation for returnees. This is due not only to the insufficient capacity of the shelters, but also to access requirements which are particularly difficult, or regularly impossible, for returnees to meet.

Admission Conditions

Even in cases where a place would theoretically be available, access to homeless shelters is associated with significant practical barriers. These relate in particular to the absence of interpretation services and the obligation to provide medical and psychiatric certificates. Obtaining these certificates is regularly extremely difficult for beneficiaries of international protection, and especially for returnees.

Meraki, RSA, AFW and NAOMI consistently report that good English or Greek language skills are required in almost all homeless shelters, as no interpretation services are provided. According to Meraki, the only exception is the homeless shelter in Kareas (Athens), where persons without such language skills can also be accommodated. However, the waiting list for this shelter is very long, and according to Meraki, they have not been able to place anyone there for years. Beneficiaries of international protection without sufficient knowledge of English or Greek are therefore effectively excluded from access to homeless shelters.

According to Meraki, additional barriers exist for persons with disabilities or mobility limitations, as many homeless shelters are not accessible for them and, for example, can only be reached by stairs or are equipped with bunk beds.

A central problem is also that, under the legal requirements, beneficiaries of international protection must submit medical certificates proving that they do not suffer from an airborne disease. According to the information available, this generally includes a chest X-ray to exclude tuberculosis, a blood test and a dermatological assessment. In addition, a psychiatric assessment is required to ensure that no serious mental disorder is present. According to the information received, obtaining this assessment regularly requires several appointments with a psychiatrist.

Arranging appointments with different doctors, specialists and psychiatrists is already a significant access barrier from a situation of homelessness, which can regularly only be overcome with intensive support.

In addition, an active AMKA is generally required in order to obtain regular access to the healthcare system. In practice, however, activation of the AMKA for beneficiaries of international protection is regularly only possible when taking up employment, which means that this requirement is often extremely difficult or impossible for beneficiaries of international protection who are homeless or at risk of homelessness to meet. According to Meraki, a person with an inactive AMKA can undergo the required examinations only with considerable effort, with support from professionals in the humanitarian sector, and where special circumstances exist, such as severe vulnerability. Further information on AMKA and access to the healthcare system can be found in Chapter 1.

Conclusion

Overall, beneficiaries of international protection, and returnees in particular, have no realistic prospect of being accommodated in municipal or state-supported homeless shelters in Greece. Although reliable nationwide figures on the total number of places actually available could not be identified in

the course of this research, the information obtained consistently shows that existing capacities fall far short of the need, that facilities are regularly full and that long waiting lists exist. In addition, there are significant access barriers, in particular the absence of interpretation services and the obligation to provide medical and psychiatric certificates, which returnees in particular often find difficult or impossible to meet.

Chapter 6: Accommodation Provided by Civil Society and Church-Based Organisations

Introduction

In Greece, a number of civil society and church-based organisations attempt to fill at least some gaps in state support for accommodation. This chapter examines whether beneficiaries of international protection, and especially returnees, have realistic access to accommodation provided by such organisations. It also sets out the extent to which civil society and church-based organisations provide accommodation options, and the limitations arising from capacity, available resources, existing need, and the operational and funding conditions of civil society organisations.

Accommodation Provided by Organisations

According to the present research, there are only a few projects in Greece run by civil society or church-based organisations that accommodate asylum seekers, people affected by displacement, and beneficiaries of international protection. The following overview sets out the currently known and active projects that could be identified in the course of the research.

Mazi Housing Project (Mazi):

Mazi provides accommodation for young single men. The target group includes people affected by displacement in general, as well as asylum seekers and beneficiaries of international protection. In addition to accommodation, food and hygiene products are also provided. Residents also receive support in accessing education, taking up employment, and building social networks. For further services, particularly in the medical or psychological field, residents are referred to other organisations.

Mazi operates several apartments in which residents share rooms. Its current capacity is 24 bed spaces. According to the project, residents stay there for an average of around nine months.

Between 2023 and 2025, Mazi received a total of 535 requests for accommodation, both directly from people affected by displacement and from organisations. According to a representative of the organisation, each request concerned a person who was either already homeless or directly at risk of homelessness. During the same period, however, Mazi was only able to accommodate 70 persons.

The number of requests therefore exceeds the available capacity many times over and illustrates the considerable mismatch between need and capacity. Mazi kept a waiting list, but closed it in June 2025 due to the high level of demand. At that time, the waiting list included 175 persons. With an average of two places becoming available per month, this would in practice have meant a waiting period of several years.

Against this background, a representative of the project expressed serious concerns that Mazi had been cited in court decisions in German-speaking countries as evidence of the availability of accommodation places, and expressly requested that the project not be presented as a generally available accommodation option.

Meaalofa – HoMER Programme (Housing, Mediation and Education for Refugees):

The HoMER programme of the organisation Meaalofa provides temporary accommodation in Athens for people affected by displacement, with the aim of promoting their independence and social integration. According to publicly available information from November 2025, around 35 to 40 persons were accommodated in a total of eight apartments, mainly women and women with children, and

occasionally also young men and families.⁴⁷ The accommodation is designed as a temporary transitional solution intended to support the transition to independent living.⁴⁸

Love without Borders (LWB):

LWB currently provides accommodation support only to a very limited extent. Two to three years ago, the organisation ran a larger housing project which, in addition to the so-called “Golden House”, where around 25 persons were accommodated, also included the rental of a total of 12 apartments. According to a representative of the organisation, these projects had to be discontinued entirely due to significant funding cuts.

At present, LWB is no longer able to provide long-term accommodation. Instead, support is limited to short-term emergency accommodation in hotels for particularly vulnerable asylum seekers and beneficiaries of international protection. In recent months, six persons were accommodated in this way. At the time of the interview with the organisation, one person was supported. The duration of stay is generally limited to a few days, usually three to seven days.

At the same time, there continues to be considerable need: according to LWB, the organisation receives around 8–12 accommodation-related requests per month. In addition, increasing legal uncertainties and concerns about the criminalisation of the work of civil society organisations also affect LWB’s activities.

CRIBS International (Cribs):

Cribs runs a housing project in Athens for women in advanced pregnancy and mothers with newborn children who have fled conflict or exploitation. According to the organisation, the programme currently provides accommodation for 17 families in a total of six apartments.

In addition to the provision of housing, the support includes monthly financial assistance and comprehensive case management. The support is typically designed to cover the first year of the child’s life and may be extended beyond that period in individual cases.

In the case of Cribs, too, there is a mismatch between demand and available accommodation places. According to the organisation, since mid-2021 it has received a total of 110 accommodation requests, while during the same period it was able to accommodate 62 pregnant women and single mothers. It should be taken into account that accommodation requests can only be submitted to the organisation during specific time windows in which places are actually available. The recorded requests therefore do not provide a complete picture of the actual need, but merely a snapshot within these limited access periods. This suggests that the actual need is significantly higher.

Choosehumanity:

According to a representative of Choosehumanity, the organisation previously had two apartments for vulnerable persons in Athens, one for men and one for women. The apartment for women has since had to be given up.

The current capacity of the remaining apartment is six places, where residents can stay for approximately twelve months. This means that new places become available only to a very limited extent. In addition, the organisation covers hotel costs in individual cases for particularly vulnerable persons who are at risk of homelessness for a limited period. In special individual cases, it also covers medical bills.

⁴⁷ Meaalofa Foundation, On the Path to Integration: Our HoMER Programme, German-language Facebook post of 6 November 2025, <https://www.facebook.com/photo/?fbid=859233189997500&set=a.178513494736143>, accessed 23 March 2026.

⁴⁸ Meaalofa Foundation, HoMER: Housing, Mediation and Education for Refugees, <https://www.meaalofa-foundation.org/projekte/homer?lang=en>, accessed 23 March 2026.

Pope John XXIII Community:

The Pope John XXIII Community is active in Greece as a religious community. In Athens, it runs the “Casa Famiglia” facility in the Neos Kosmos neighbourhood, which is aimed at particularly vulnerable persons, also including people affected by displacement. In addition to accommodation, the facility also provides basic support services, such as legal, health, education and food support.

According to a representative of the facility, around 100 accommodation requests were received in the past two years, concerning around 200 persons in total. During the same period, 32 persons were actually accommodated. At the time the information was provided, the facility was accommodating 13 persons. Accommodation is provided mainly on the basis of referrals by organisations, church structures or direct requests from affected persons.

Missionaries of Charity (Mother Teresa House):

The Order of the Missionaries of Charity operates facilities in Greece for the accommodation of women in emergency situations. In Thessaloniki, one house is documented as providing accommodation for up to eight women and girls in acute emergency situations, with the duration of stay limited to a maximum of three months.⁴⁹ A similar facility also exists in Athens, although its exact capacity could not be determined in the course of this research.

Duniya Housing Program:

According to a representative of the Duniya Housing Program, the programme’s current capacity is five persons. The programme operates one apartment for single men who are asylum seekers or beneficiaries of international protection and are selected according to their degree of vulnerability.

By contrast, the organisation’s website and the judgment of the German Federal Administrative Court of 23 October 2025 still refer to capacities of 58 persons, with a planned expansion to up to 90 persons.⁵⁰ According to the information available, however, these figures are outdated and no longer reflect the current situation. According to information provided to the author by a representative of the programme, capacity has been reduced to five places as a result of significant funding difficulties.⁵¹

NAOMI:

NAOMI does not operate its own accommodation facilities or shelters. Instead, the organisation provides limited financial assistance in individual cases, for example for rent subsidies or short-term hostel accommodation to avert acute homelessness. However, rent subsidies or loans for renting an apartment have been granted only to a very limited extent (2023: one case, 2024: no cases, 2025: two cases).

In addition, since 2022, short-term hostel accommodation has been provided in a total of 21 cases for particularly vulnerable beneficiaries of international protection who were at immediate risk of homelessness. The duration of this accommodation is limited to a very short period and depends on the individual case and the budget available at the time. Typically, it ranges from one night to a maximum of ten nights.

Funding for these services is currently not secured beyond 2026, so it is unclear whether NAOMI will be able to continue offering this support in the future.

⁴⁹ Limmat Stiftung, Renovation of the House of Mother Teresa Sisters in Thessaloniki, 26 September 2024, <https://www.limmat.org/en/2024/09/26/renovation-of-the-house-of-mother-teresa-sisters-in-thessaloniki/>, accessed 22 March 2026.

⁵⁰ Finding Refuge, Explore Our Programs, <https://findingrefugegr.org/programs/>, accessed 1 April 2026; German Federal Administrative Court, judgment of 23 October 2025, BVerwG 1 C 11.25, para. 44.

⁵¹ Information provided to the author by a representative of the Duniya Housing Program on 1 April 2026. On file with the author.

Structural Limits of Civil Society Accommodation Services

The information presented shows that existing accommodation capacities fall far short of the actual need and cannot meet it. Chapter 8 on homelessness sets out more detailed data on the need for accommodation places and acute accommodation support for beneficiaries of international protection who are homeless or living in precarious situations.

In addition to limited capacity, a large proportion of the existing places are accessible only to narrowly defined target groups (e.g. women in advanced pregnancy or young single men). Moreover, asylum seekers, people affected by displacement, survivors of sexual violence, victims of human trafficking and torture, and other vulnerable groups compete with beneficiaries of international protection and returnees for the few available places. As a result, even existing accommodation services are in practice largely inaccessible to many beneficiaries of international protection.

A further difficulty is that civil society organisations operate under structurally difficult conditions. The reduction in available funding, particularly by USAID and UNHCR, has concrete effects on the financing of civil society projects in Greece.⁵² According to the findings available and the information obtained in the course of the research, numerous organisations faced significant funding difficulties in 2025, as a result of which initiatives had to reduce or entirely discontinue their support services. There are also indications of continuing funding difficulties for 2026. Against this background, there are no reliable indications that available accommodation capacity will be expanded. The findings point instead to a further reduction.

Additional difficulties arise from the limited resources of civil society organisations. These organisations often operate with limited financial resources and rely on highly committed staff who frequently face excessive workloads and are at risk of burnout. At the same time, they operate in a field in which basic existential needs such as accommodation, food and hygiene are not guaranteed for many people. The combination of severe hardship and a large number of affected persons creates constant pressure on civil society organisations and their staff, who under these conditions attempt to compensate for existing gaps in provision. In addition, they are increasingly confronted with the criminalisation of their work by state authorities.⁵³

This structural overburdening is also described by staff members of civil society organisations. A social worker from Meraki described the situation as follows:

“We work with people who are in permanent survival mode. We try to empower people who live in a deeply discouraging environment. At the same time, this also pushes the organisations themselves into survival mode. We try to build something, but how can you build something when everything is burning and you are constantly only trying to put out fires?”

This description illustrates why many organisations are hardly able to build long-term and stable support structures, as they must continuously respond to acute emergencies.

⁵² The Guardian, They fled war and sexual violence and found a safe space in Athens. Then the aid cuts hit, media report of 26 September 2025, <https://www.theguardian.com/global-development/2025/sep/26/trump-aid-cuts-greece-migrants-refugees-women-shelter-violence-ngos-funding>, accessed 22 March 2026.

⁵³ Human Rights Watch, Greece's Latest Assault on Civil Society, <https://www.hrw.org/news/2025/09/16/greeces-latest-assault-on-civil-society>, accessed 22 March 2026; Human Rights Watch, Greece Under Fire for Law Targeting Aid Groups, <https://www.hrw.org/news/2026/02/26/greece-under-fire-for-law-targeting-aid-groups>, accessed 22 March 2026.

Case Examples

Upon return, returnees are regularly affected by immediate housing needs. A total of four interviewees were able to stay temporarily in accommodation provided by organisations or church-based facilities after their return. These cases, however, are unlikely to be representative of the situation of returnees as a whole. Rather, access to NGO accommodation is likely to be overrepresented in the present sample, because contact with the interviewees was established exclusively through organisations that either provide accommodation themselves or have contacts with such structures.

In three of these four cases, accommodation in Greece had already been organised before return, either through existing contacts or with the support of third parties. In the cases of Interviewees 7 and 9, this was made possible through the support of a Swiss organisation or a particularly committed volunteer.

In the case of Interviewee 1, access to NGO accommodation was also not based on a structured procedure, but on a chain of individual support measures. The starting point was a personal contact with an NGO staff member whom she knew from the period when she first arrived in Greece and who initially paid privately for a hotel for two days. Through this contact, she was referred to another organisation, which covered the cost of a hostel and eventually found a third organisation that was able to provide accommodation for three to four months.

Access to accommodation was therefore based on a multi-stage support structure that is not systematically accessible. It is also likely to have been relevant that Interviewee 1 spoke good English and was therefore able to re-establish and maintain contact with the NGO staff member.

In the case of Interviewee 6, too, accommodation was only possible with the help of existing contacts and a chain of referrals. Through contact with an organisation from her previous time in Greece and onward referrals to several organisations, some of which were searching for accommodation options in parallel, it was eventually possible to obtain accommodation for several weeks in a non-state facility. Based on the author's practical experience, such multiple involvement of different organisations in the same case is not unusual. It often results from difficult coordination between different projects, combined with high time pressure and considerable hardship faced by those affected. Even though it is often difficult to avoid in practice, it ties up scarce resources that are then unavailable elsewhere.

Existing contacts and individual factors such as language skills may be what make access to organisations possible in the first place. Conversely, the cases available show that access to NGO accommodation is significantly more difficult where no existing contacts with organisations are in place. A further aggravating factor may be that, following negative experiences with NGO support, beneficiaries of international protection do not seek further contact and thereby effectively remain cut off from support services. The available experiences show that support from organisations is sometimes perceived as unhelpful by beneficiaries of international protection, so that some affected persons do not approach such services, or do not do so again.

For example, Interviewee 3 reported that the availability of support was so limited that it had been necessary to queue as early as 4 a.m. in order to obtain an appointment at all. Interviewee 4 stated that he perceived the support provided by organisations as unhelpful and therefore did not seek further contact. Interviewee 2 reported that he contacted almost all organisations in Athens, but received support only in a few cases. Similarly, contacting organisations did not lead to accommodation in the case of Interviewee 8.

The author's experience from managing the Mobile Info Team's casework also shows that referrals to accommodation are only rarely successful. Although inquiries are regularly made and referrals to

organisations are carried out, these lead to a placement in accommodation only in a small number of cases due to the lack of available capacity.

In both cases, the accommodation provided to Interviewees 1 and 6 was limited to a short period (three months and one month, respectively). Such short-term forms of accommodation are generally not designed to enable sustainable stabilisation or integration, particularly with regard to finding work and housing.

As a result, threatened homelessness is often merely postponed, without a viable long-term solution emerging. In the case of Interviewee 6, the two young women eventually returned to the Nordic country from which they had previously been returned to Greece. They saw no possibility in Greece of finding work or housing and escaping the threat of homelessness. Interviewee 1 also expressed great concern that, after her current accommodation ends in a few weeks, she will have no accommodation and will be unable to secure her livelihood because she lacks sufficient financial means.

Limits of Long-Term NGO Housing Projects

Housing projects aimed at long-term integration usually have significantly lower capacity, as the duration of stay is often one year or more. At the same time, the support required for integration is substantial and includes, among other things, legal counselling, psychosocial support, trauma support, language courses, and support in finding work and housing.

Such projects report a high financial burden and significant staffing demands, while the success of these measures remains uncertain under the existing structural conditions. In addition, accommodating particularly vulnerable persons requires specific protection measures and close support, which further limits the admission of additional persons.

Interviewees 7 and 9 were both able to remain in such accommodation for a longer period, namely around two years, and to receive comprehensive support. Nevertheless, even in these cases, no secure long-term perspective is apparent: Interviewee 7 now lives in his own apartment, but continues to face significant financial uncertainty and fears that he will not be able to keep his apartment. Interviewee 9 works in insecure informal work and has neither a stable income situation nor a realistic prospect of regular employment or his own apartment.

Data provided by Mazi⁵⁴ strongly support this assessment. Of a total of 97 young men accommodated through the project between 2020 and 2026, the majority left Greece after the end of the support period (approximately 56%). A further approximately 9% found themselves in unstable housing situations after leaving the accommodation, for example in unofficial accommodation or with friends. Only slightly more than one third of residents were subsequently able to rent an apartment independently or to develop an alternative perspective through seasonal employment.

Cribs also reports similar difficulties in the transition of supported women to independent living. Single mothers are initially accommodated by the organisation, receive psychosocial support and are intensively prepared for independent living. Nevertheless, after the transition to independent housing, a notable number of women end up again in precarious and, in some cases, unsafe situations, particularly after temporary employment or other sources of income come to an end.

⁵⁴ Of a total of 134 persons accommodated through Mazi between 2020 and 2026, 18 were still in the programme at the time of data collection, while no information was available for a further 19. For the remaining 97 persons who had already left the programme, information on their subsequent situation was available: 54 persons (55.7%) had left Greece, 9 persons (9.3%) were in unstable housing situations (e.g. in informal accommodation or with friends), 26 persons (26.8%) were living independently (alone or in shared accommodation), and 8 persons (8.2%) had seasonal employment outside Athens (either in informal work or in legally registered employment).

This illustrates that even long-term and intensive support does not guarantee sustainable integration. At the same time, it becomes clear that the existing structural conditions in Greece, including the lack of sufficient state support and integration measures, considerably impede sustainable integration.

Conclusion

In summary, civil society and church-based organisations in Greece make a committed and, in many cases, indispensable contribution to supporting beneficiaries of international protection. However, the existing accommodation services are far from sufficient in terms of both scale and design to meet the actual need.

The available places are very limited overall and are often accessible only to narrowly defined target groups. At the same time, access to these services in practice often depends on existing contacts, support already organised in advance, or whether a place is available at all at the relevant time. Even in cases where accommodation is obtained, it is often a short-term solution that does not offer a sustainable perspective. Long-term programmes, too, are available only to a very limited extent due to their high staffing and financial requirements, and do not necessarily lead to stable integration.

In addition, there are structural challenges, in particular limited financial resources, a high burden on organisations, and structural conditions that further complicate their work. Against this background, civil society is not able to close the existing gaps in provision.

Overall, beneficiaries of international protection and returnees therefore have no reliable or generally accessible prospect of obtaining access to housing or emergency accommodation provided by civil society or church-based organisations.

Chapter 7: Informal Accommodation

Introduction

Where beneficiaries of international protection have no access to state accommodation, homeless shelters or the regular housing market, informal accommodation options are often the only remaining option. In order to assess their actual accommodation situation, it is therefore important to examine which forms of such accommodation exist in practice, what living conditions are associated with them, and what risks may arise from them.

The research identified various forms of informal accommodation, which differ considerably in their practical relevance. According to the available findings, squats, informal settlements and accommodation linked to employment play only a limited role, or are accessible only under very precarious conditions. By contrast, staying with acquaintances, casual contacts or other third parties is of greater practical significance.

One focus of this chapter is on Masafarhanas, which are referred to in this report as unofficial hostels. The findings on these forms of accommodation are particularly detailed and concrete. On the basis of these findings, the chapter examines in detail under what conditions unofficial hostels exist in practice and what risks may be associated with them.

Squats

Buildings occupied by solidarity initiatives, referred to here as “squats”, currently play only a very minor role in accommodating beneficiaries of international protection and returnees. In the past, particularly in Athens and Thessaloniki, there were a number of such structures that accommodated a significant number of people affected by displacement. According to AFW, Meraki and LWB, however, the vast majority of these squats have been evicted since the centre-right party Nea Dimokratia came to power in 2019.⁵⁵

According to AFW and Meraki, the few squats that still exist today sometimes offer better living conditions compared with other forms of informal accommodation. However, they have only very limited capacity and can therefore provide accommodation to only a very small number of people. In addition, they are under constant pressure from evictions by the authorities. According to AFW and Meraki, they are also exposed to the risk of attacks by far-right groups, meaning that they do not offer a stable accommodation option either.

Access to squats is neither structured nor reliable, but usually occurs by chance or through personal contacts and existing networks. For newly arriving or returning persons, there is therefore no predictable access, not least because of the limited capacity.

Squats therefore do not constitute a realistically accessible, reliable or generalisable accommodation alternative to which beneficiaries of international protection or returnees in Greece could be referred.

Informal Settlements and Abandoned Buildings

Based on the author’s experience from work on the ground, such forms of accommodation in practice often involve staying in construction ruins or remote, abandoned houses as short-term emergency shelters. However, the living conditions there must be considered inhuman and, in effect, hardly differ from living on the street or in parks.

⁵⁵ In March 2021, the Greek government stated that it had evicted 37 occupied buildings nationwide: Ministry of Citizen Protection, “Only 26 selected lies, inaccuracies, fake news, half-truths and slanders from the numerous press releases by SYRIZA on police violence, which were also raised in the parliamentary debate on police violence”, Greek-language press release of 15 March 2021, p. 1, <https://www.minocp.gov.gr/file/2021/03/15032021-26simejaa.pdf>, accessed 19 March 2026.

Basic infrastructure such as electricity and running water is generally lacking. Minimum hygiene standards are not guaranteed. The buildings are often not secure, for example because doors or windows are missing or because they are unfinished structures without complete walls, meaning that there is no protection against theft or violent attacks. In addition, there is neither heating nor cooling, which leads to significant exposure to cold in winter and heat in summer. There is also no protection against insects, especially mosquitoes. The immediate surroundings are often littered with waste, which leads to strong odour problems, particularly in the summer months.

Against the background of the state measures intensified since 2019 to “restore security” and the associated systematic eviction of occupied buildings, there is a clear risk of evictions by the authorities also affecting informal settlements and makeshift camps. In addition, the author has regularly observed police operations against people affected by displacement living in conditions similar to homelessness. This further argues against such places being tolerated in the long term or offering a reliable accommodation option.

Such places therefore do not constitute a viable or acceptable accommodation alternative, but at most short-term survival strategies in situations of acute homelessness.

Accommodation Linked to Employment

Indications of accommodation linked to employment were identified from individual accounts by returnees as well as from reports by organisations. The available findings concern in particular agricultural work, gardening and domestic work. They consistently point to extremely precarious living and working conditions.

Interviewee 1 reported that, in the context of work in the orange harvest, she was provided with accommodation in a warehouse where men and women slept together. There were neither sanitary facilities nor any private space to which women could withdraw. She reports that she could hardly sleep at night because of fear of possible assaults and left after one week. Because of her early departure, she did not receive payment for the work already performed.

Interviewee 7 also describes accommodation in the context of agricultural work. He characterises it as very poor and provided photos showing makeshift tents in a rural setting. Such accommodation offers no protection from the weather (no heating or cooling) or from theft or violent attacks. Basic infrastructure such as electricity is also lacking.

Cribs confirms the very poor accommodation conditions linked to agricultural work. In addition, Cribs reports similar forms of accommodation linked to work in the tourism sector on the islands. There, women are sometimes accommodated in overcrowded and poorly maintained basement rooms occupied by four to six women.

Choosehumanity reports a case in which a man affected by displacement worked as a gardener and was accommodated by his employer. He was assigned a place to sleep on a mattress in a garage. He also received only one meal per day and had to work 14 hours a day. Due to the poor accommodation conditions and long working hours, he ended the work prematurely.

Accommodation arrangements were also reported in connection with domestic work. AFW pointed out that women in particular who are accommodated in private households as part of their work, for example as childcare workers, are often socially isolated there and particularly dependent on their employers. According to AFW and Meraki, they are aware of cases of sexualised violence and exploitation in such arrangements.

The cases described have in common that accommodation was provided only in connection with precarious and insecure working relationships. It was therefore not an expression of an independent accommodation option, but part of an exploitative relationship of dependency.

Irrespective of the living conditions described, access to such accommodation is neither reliable nor predictable. It depends on chance opportunities and personal contacts and presupposes a willingness to work under exploitative conditions. The available findings therefore do not confirm the assumption that reliably accessible accommodation options exist near agricultural businesses or in comparable contexts that could be considered a realistic accommodation alternative for beneficiaries of international protection. Rather, these are insecure, work-related emergency solutions that are associated with additional risks, especially for women.

Staying with Acquaintances, Casual Contacts or Third Parties

Staying with acquaintances, casual contacts or other third parties may be one of the few remaining options for beneficiaries of international protection when no other accommodation can be found. This form of accommodation often arises from an acute lack of alternatives. Cribs reports that, after leaving camps or arriving in larger cities, beneficiaries of international protection often have no money, no work, insufficient language skills and no sustainable support structures, and therefore depend on persons from their own country of origin or community, acquaintances from earlier stages of their journey or casual contacts, staying on sofas or floors.

Access to such accommodation is often particularly uncertain for returnees without an existing social network and is neither predictable nor guaranteed. AFW reports cases in which persons without accommodation were approached in public spaces and taken into private apartments at short notice, often initially free of charge and under precarious conditions. In individual cases, an initial informal arrangement can gradually turn into an expectation of payment, for example where affected persons initially sleep on the floor and are later expected to start paying rent.

Interviewee 1 also reported that, after being granted international protection, she had no money or accommodation and depended on finding new places to sleep every day through other women from her country of origin. Free accommodation was usually possible only for one night, or at most two. After that, she had to organise another place to sleep. She described it as very stressful to have to worry every day about where she could spend the following night. At times, she had to be hidden in apartments because the person managing or renting out the apartment would not have tolerated her presence.

The information provided by Interviewee 1, AFW and Cribs suggests that staying with third parties often also takes place in unofficial hostels. These are overcrowded apartments in which places to sleep are provided on mattresses or on the floor and which are rented or managed by another person. The conditions in unofficial hostels are examined in detail in the following subchapter.

Staying with third parties is usually short-term, unreliable and characterised by strong dependency relationships. The persons affected generally have no legal protection and can be asked to leave the accommodation at short notice. Dependence on the persons providing accommodation creates a significant power imbalance, which can place those affected in particularly vulnerable situations, especially where no alternative accommodation options exist. For women, staying with acquaintances, casual contacts or other third parties is associated with significant risks, as in such constellations they may be particularly exposed to exploitation, harassment or assault. Numerous cases of sexualised violence and exploitation are known from various sources and are presented in more detail in Chapter 17.

This form of accommodation is structurally precarious and generally offers neither security nor reliable protection against homelessness. It therefore does not constitute an independent or acceptable accommodation alternative to which beneficiaries of international protection or returnees can be referred.

Unofficial Hostels

One form of accommodation for beneficiaries of international protection and returnees that appears to be common according to the available findings is unofficial hostels. These are apartments converted into hostels, operated without a formal basis and providing a place to sleep in exchange for payment. Information on this form of accommodation is available from reports by seven organisations and five interviewees.

General Conditions

The apartments consist of one or more sleeping rooms. Occupancy of six to ten persons per sleeping room has been reported.⁵⁶ According to Meraki, the total number of persons accommodated in one apartment ranges between ten and thirty.

These are ordinary apartments that are not designed for such high occupancy and would usually be intended at most for a family or shared household. In the sleeping rooms, mattresses are usually placed on the floor. In some cases there are also beds, but these are shared by different persons. Mazi reports that in such cases people sometimes have to sleep in shifts so that they do not have to physically share a bed at the same time. Interviewee 5 was the only interviewee who stayed overnight in an unofficial hostel in Thessaloniki. He paid EUR 10 per night there. The prices reported in Athens vary between EUR 140 and 200 per month.⁵⁷

According to the available reports, the majority of unofficial hostels are intended only for men. In some cases, mixed accommodation was also reported, with sleeping rooms for men and for women. However, this does not allow the conclusion that there is a reliable or acceptable accommodation option for women. Rather, the further findings show that significant protection gaps exist precisely in such constellations.

Hygiene

The overcrowding of the apartments leads to significant problems with hygiene, washing facilities and health. In most cases, only one toilet is available, which also serves as the only washing facility or shower. In individual cases, adequate shower facilities are even entirely absent. Interviewee 5, for example, stated that it was only possible to wash one's face. The shared use of these sanitary facilities by 10 to 30 persons regularly leads to overuse and queues, particularly in the morning and evening hours. Basic hygiene measures such as washing and showering are therefore often possible only to a limited extent or irregularly. Interviewee 3 also reported that during the winter months it had repeatedly not been possible to shower because no hot water was available. Due to the high frequency of use, adequate cleaning is hardly guaranteed, resulting in unhygienic conditions. This increases the risk of infections and significantly impairs the dignity of those affected.

For women, this creates additional burdens. Particularly in mixed accommodation with inadequate sanitary facilities, privacy is often lacking. The use of toilets and showers can be associated with considerable insecurity, especially in the evening and night hours. This may lead to sanitary facilities being used only to a limited extent, which in turn can have health consequences. Adequate menstrual hygiene is also often not guaranteed under these conditions.

⁵⁶ Interviewees 1, 2, 3, 4 and 5, as well as Meraki.

⁵⁷ Interviewees 1, 3 and 4, as well as LWB.

Several interviewees and organisations also report catastrophic hygienic conditions. These are closely linked to the severe overcrowding of the apartments and insufficient cleaning possibilities. AFW reports, for example, of a refrigerator covered with cockroaches. Cases of scabies and bedbug infestations are also repeatedly described, for example by Interviewees 2 and 4 as well as Meraki. These not only lead to considerable physical discomfort, such as skin rashes and severe itching, but are also extremely difficult to contain effectively under the given conditions and can easily spread to other residents. Interviewee 4 reports that he had great difficulty sleeping because of a skin rash caused by bedbugs.

According to AFW, overcrowding and unhygienic conditions also create an increased risk of the spread of infectious diseases, particularly airborne diseases such as influenza or other respiratory illnesses. Interviewee 2 also reports particularly stressful conditions during the summer months. Due to the lack of cooling and insufficient ventilation, considerable heat can build up in the apartments, further exacerbating the hygiene problems, for example through increased odour problems and the spread of insects.

Privacy

The lack of privacy and the associated poor sleeping conditions constitute a central problem in unofficial hostels. Private spaces to withdraw to generally do not exist. Several people share cramped rooms, often without any possibility of separation. This leads to a permanent state of stress and makes restful sleep particularly difficult. Interviewee 3 reported that the overcrowding and sharing a room with many other people made undisturbed sleep practically impossible. Lack of sleep and insufficient rest have a direct negative impact on physical and mental health and make it more difficult to stabilise one's living situation.

Dependence on Support Services

Interviewees 3, 4 and 5 stated that they remain in unofficial hostels because they lack the financial resources to rent alternative accommodation. At the same time, these forms of accommodation often do not cover basic needs, as reported by Interviewees 4 and 5 as well as AFW. Residents are therefore often dependent on free support services provided by aid organisations, for example in order to obtain food, shower, or wash clothes.

Access to these services, however, is associated with significant practical difficulties. Meraki reports that the existing services in Athens are not sufficient to meet the actual need. In addition, the various services are provided at different locations, some of which are far apart. Affected persons must therefore go to different contact points for different basic needs. For example, they must visit one facility for food, another to wash clothes and another for shower facilities.

The distances between these services are often covered on foot, as many of those affected do not know the city or have difficulty orienting themselves. The use of public transport is in principle possible, but regularly leads to problems when tickets cannot be paid for. As a result, fines are imposed, which increase significantly if not paid and may be registered as debts with the tax authorities. According to Meraki, such debts have reached several thousand euros in individual cases.

Safety

Safety cannot be guaranteed in unofficial hostels. Frequently changing residents, who are generally unfamiliar with one another and whose backgrounds are unknown, create an environment of constant insecurity. Interviewee 3 reported that his mobile phone was stolen in an unofficial hostel on the very first night after his forced return to Greece. It contained not only his contacts, but also digital copies of his documents. RSA reports physical assaults in such accommodation.

Unofficial hostels also do not guarantee a longer-term and stable stay. RSA, AFW and Meraki consistently report that residents are forced to leave as soon as they can no longer pay the rent or when other persons are willing to pay higher prices. Interviewee 5, for example, was expelled from an unofficial hostel in Thessaloniki after less than two weeks when his place was given at short notice to other people who could pay more. Particularly where financial resources are insecure, there is therefore a constant risk of homelessness, which those running the unofficial hostels can deliberately use as a means of pressure.

AFW also reported that, in some unofficial hostels, intermediaries or so-called managers withheld rent payments from residents without passing them on to owners or landlords. This meant that residents were threatened with eviction from the accommodation despite having made payments.

The strong dependence on these forms of accommodation, combined with the absence of alternatives, creates conditions in which extortion can occur more easily. Meraki reported, for example, that in some cases residents' documents were withheld as a "deposit" when they were unable to pay their rent. In other cases, residents were pressured to take on tasks, such as transporting packages with unknown and potentially illegal contents. At the same time, those affected in practice have no possibility of defending themselves against such practices: anyone who raises problems or resists risks the immediate loss of accommodation and thus homelessness. The lack of legal protection and the informal structure of these forms of accommodation further increase their vulnerability.

Risk of Eviction

In addition, unofficial hostels are operated without a legal basis and often violate basic legal requirements, particularly in the areas of fire safety, health protection and building use (e.g. missing emergency exits, inadequate ventilation or overcrowding). In most cases, there is no supervision by authorities or licence as an accommodation business.

Against this background, administrative measures up to and including the closure or eviction of such accommodation appear possible at any time. In such a case, residents would lose their accommodation at short notice without alternative accommodation being provided. The illegality of these structures therefore creates additional instability and increases the risk of sudden homelessness.

Safety Risks for Women

For women in particular, unofficial hostels in which men and women are accommodated together are not safe places. Even where sleeping rooms are separated, there are no lockable or protected areas, meaning that unhindered access by other residents remains possible.

Several organisations report significant safety concerns. AFW and Meraki state that women in such accommodation regularly express fear of being assaulted and feel unsafe on the premises. These assessments are supported by further reports: RSA and Cribs also point out that residents, especially women and other vulnerable groups, are exposed to an increased risk of exploitation and violence in such accommodation.

These structural risks are also reflected in concrete everyday situations. AFW reports that women have to adapt their behaviour in order to protect themselves, for example by using sanitary facilities only to a limited extent or by being unable to leave their children unattended.

Longer-Term Stays Due to Lack of Alternatives

At the same time, unofficial hostels often become places where people stay for longer periods due to the lack of alternatives. Because of limited financial resources, many residents are not able to find

more stable or better accommodation. Even where the accommodation can be paid for, this often happens at the expense of basic needs. Interviewee 4, for example, stated that he could only afford the unofficial hostel because his father in Afghanistan supported him financially. At the same time, he lacked funds for food, so that he could at times afford only one meal a day and lived mainly on bread.

Three interviewees spent between three and twelve months in such hostels; two were still living there at the time of the interview.⁵⁸ AFW also reports that, for women in particular, these forms of accommodation can become places where people remain for longer periods because no financial means are available for alternative housing options.

Opportunities to find more stable or better accommodation are severely limited. Meraki points out that basic living conditions are often not secured, and raises the question of how affected persons are supposed to concentrate on learning the language or looking for work when even access to basic needs such as showering or washing clothes is not guaranteed. Residents of unofficial hostels are often in a permanent survival mode, which leaves little room for stabilising their living situation.

At the same time, this situation creates a structural cycle: precarious housing conditions make it more difficult to take up or maintain employment, while the lack of income in turn prevents access to more stable forms of housing. For many affected persons, an improvement in their living situation therefore remains effectively out of reach.

These findings show that, despite their instability and insecurity, unofficial hostels are in fact used as long-term accommodation - not because they are suitable, but because realistically available alternatives are lacking.

Effects on Mental Health

The combination of longer stays in this form of accommodation and the poor living conditions described has a significant impact on the well-being and mental health of those affected. The constant pressure caused by uncertainty about whether they will be able to stay, financial worries, undignified living conditions, lack of privacy and the risk of theft or violence means that even mentally healthy people are placed under considerable strain.

Meraki reports that under these circumstances psychological distress often develops, or existing mental health problems worsen. At the same time, it is difficult to obtain access to treatment or medication. In addition, the living conditions in unofficial hostels stand in the way of stabilisation or recovery, since basic requirements such as sufficient sleep, a healthy diet or a stable daily routine are not guaranteed.

This is also supported by statements from interviewees. Interviewee 2 stated that he was reluctant to think back to his time in an unofficial hostel and experienced it as very distressing. Interviewee 3 reported that he had not experienced a single good day since his return to Greece. In the unofficial hostels, everything was difficult - sleep, nutrition and hygiene. The lack of privacy in particular was described as unbearable. He felt dehumanised and reduced to a mere source of income for the person running the unofficial hostel.

Conclusion

The available findings show that beneficiaries of international protection and returnees in Greece do sometimes resort to informal forms of accommodation, but that, in the vast majority of cases, they should be understood only as short-term, precarious and unreliable survival strategies. This applies to

⁵⁸ Interviewee 2: at least six months; now lives in his own apartment. Interviewee 3: three months; at the time of the interview, he was still living in an unofficial hostel. Interviewee 4: more than twelve months; at the time of the interview, he was still living in an unofficial hostel.

squats, dilapidated or abandoned buildings, accommodation linked to employment, and staying with acquaintances or other third parties. Such forms of accommodation are regularly dependent on chance, personal contacts or exploitative working relationships, are associated with significant uncertainties and in some cases considerable safety risks, and offer no reliable protection against renewed homelessness.

The main focus is on unofficial hostels. According to the information obtained, these are encountered repeatedly in practice, but do not constitute a humane or acceptable accommodation alternative. The living conditions there are regularly characterised by severe overcrowding, inadequate sanitary facilities, lack of hygiene, lack of privacy, insecurity, and significant dependency and exploitation. Longer stays in these forms of accommodation can have a lasting impact on mental health and make it structurally more difficult to improve one's living situation.

The material gathered also indicates that women may in individual cases be able to stay in such accommodation, but significant additional risks exist, in particular due to the absence of protected private spaces, insufficiently protected sanitary facilities, and the risk of harassment, exploitation and violence.

Overall, the available findings therefore do not show that beneficiaries of international protection in Greece have access to a reliable, humane and acceptable accommodation perspective through squats, informal settlements, makeshift camps, accommodation linked to employment, staying with acquaintances or third parties, or unofficial hostels. Rather, these are forms of precarious emergency accommodation which, in functional terms, often merely prolong homelessness or shift it into other precarious settings.

Chapter 8: Homelessness

Introduction

Homelessness is the most serious expression of a lack of access to accommodation. It therefore is the focus of this chapter, which examines the living situation of beneficiaries of international protection in Greece from the perspective of homelessness and acute housing insecurity. The central question is the extent to which beneficiaries of international protection are affected by homelessness, the immediate threat of homelessness, and situations similar to homelessness.

The duration of homelessness, as well as its structural causes and practical consequences, are also examined. A particular focus is placed on beneficiaries of international protection who return to Greece from other EU Member States.

Number of Cases from Organisations

Since no comprehensive official statistics exist on homelessness among beneficiaries of international protection in Greece, the present assessment is based on several consistent sources of information, in particular reports and statistics provided by organisations, as well as interviews with affected persons. The findings presented are therefore not based on isolated observations, but on converging information from different sources.

Almost all organisations interviewed on this issue in the course of this research gave consistent accounts of regular cases of beneficiaries of international protection who were either homeless or living in precarious conditions similar to homelessness.⁵⁹ This assessment is supported by concrete case numbers relating to different groups of affected persons. For example, between 2023 and 2025, Mazi received a total of 202 requests from young male beneficiaries of international protection who were homeless or at risk of homelessness. Over the past four and a half years, Cribs received 47 requests from organisations for the admission of beneficiaries of international protection who were homeless or at risk of homelessness. All requests concerned women in advanced pregnancy or mothers of newborn children.

LWB reports an average of eight to twelve requests per month over the past twelve months in connection with homeless people affected by displacement, including many beneficiaries of international protection and returnees. The Pope John XXIII Community recorded around 100 accommodation requests in the past two years, corresponding to an estimated total of around 200 people affected by displacement. The Wave community centre in Thessaloniki also reports a consistently high need for support among beneficiaries of international protection. According to the centre, homeless beneficiaries of international protection are among its visitors almost every day.

NAOMI is also regularly contacted by asylum seekers and beneficiaries of international protection who are either homeless or directly at risk of homelessness. According to the organisation's internal records and experience, this includes both people living on the street and persons in highly unstable accommodation situations. In 2024, NAOMI documented 42 such cases, and a further 23 in 2025. In the first three months of 2026, five further cases were recorded, including three single men and two families.

These figures cover only documented cases in contact with the respective organisations and therefore reflect only a partial picture of the actual situation. It must be assumed that many affected persons do not reach suitable support structures and therefore do not appear in these data. In addition, not all requests are systematically recorded. For example, Cribs only documents requests during periods in which admission is possible in principle. The actual number of beneficiaries of international protection

⁵⁹ Meraki, AFW, Cribs, LWB, Mazi, Wave, RSA, NAOMI and Choosehumanity. MSI was not interviewed on homelessness.

who are homeless or at risk of homelessness is therefore likely to be higher than the available case numbers.

Number of Cases of Homeless Returnees

The group of returnees is particularly affected. Reliable figures are provided by the organisation Meraki, which supported a total of 64 returnees in 2025 and documented their accommodation situation at the time of first contact.⁶⁰ According to the organisation, contact took place on average several weeks after return to Greece.

According to these data, 14 persons (21.9%) were homeless at the time of first contact. A further 9 persons (14.1%) were staying in short-term accommodation paid for on a daily basis, such as unofficial hostels or apartments where daily payment was required. In the assessment of the responsible social worker, this was not stable accommodation, but conditions similar to homelessness, as those affected often had a place to sleep only for one night at a time and could become homeless again at any moment.

A further 26 persons (40.6%) were accommodated, but according to the information collected were directly at risk of homelessness. Relevant factors included impending evictions, pressure to leave the accommodation, temporary stays without any follow-up solution, overcrowding, and housing conditions with protection risks. Only 2 persons (3.1%) were accommodated by organisations, and not a single person was in a municipal or state-supported homeless shelter. Overall, 76.6% of the returnees supported by Meraki were therefore either homeless, accommodated in conditions similar to homelessness, or directly at risk of homelessness at the time of first contact.

These figures represent a snapshot at the time of first contact and capture only the respective situation at that specific moment. In view of the documented, often only short-term and unstable forms of accommodation, such as daily payment, informal arrangements or temporary stays with third parties, it must be assumed that this snapshot does not overstate the actual extent of homelessness, but rather tends to underestimate it. Accommodation situations frequently change within a few days or weeks, so that phases of apparent accommodation and homelessness merge into one another.

This assessment is confirmed by the statements of RSA. According to a representative of the organisation, homelessness among returnees upon arrival in Greece is the rule. Returnees do not receive sufficient support from state authorities after their return, and there are no viable support structures that could ensure sustainable accommodation. In the vast majority of cases supported by RSA, homelessness was documented. According to RSA, although some affected persons manage to find short-term accommodation, for example in unofficial hostels or with acquaintances or friends, these are often only temporary solutions for a few days or weeks, after which they end up on the street again.

According to Meraki, attempts were made to find accommodation in all cases in which returnees requested such support. In 2025, however, this was successful in only 5 cases. This underlines the significant gap between the need for accommodation and the accommodation options actually available.

Duration of Homelessness

The duration of homelessness varies considerably depending on the individual case and, according to the available findings, ranges from a few days to several months and, in individual cases, even several years.

⁶⁰ Internal case statistics on returnees in 2025 provided by Meraki. In total, 77 returnees contacted Meraki; 13 inquiries had to be referred to other organisations due to limited capacity.

Interviewees 2 and 4 reported that they had been homeless for several days after their arrival in Greece. AFW also reports several female beneficiaries of international protection who had to sleep in parks or on the street for two or three days before finding a temporary solution. Wave likewise observes that homeless beneficiaries of international protection often find a solution after a few days or a few weeks, while also emphasising that this by no means always succeeds.

Other cases, however, show that homelessness can also last significantly longer. Interviewee 5 stated that he had lived on the street for six weeks. Mazi reports the case of a returnee from Germany who was homeless for almost two months. Choosehumanity describes the case of a female beneficiary of international protection with a severe chronic illness who slept on the street for several weeks after recognition of international protection. LWB reports the case of a Syrian beneficiary of international protection who was homeless for several months. The Wave community centre also describes the case of a beneficiary of international protection who has been homeless for several years.

No uniform pattern regarding the duration of homelessness can be derived from the available findings. The documented cases suggest, however, that periods of homelessness more often last from a few days to several weeks, while homelessness lasting several months occurs less frequently.

Reasons for the Risk of Homelessness among Beneficiaries of International Protection

The increased risk of homelessness among beneficiaries of international protection is primarily attributable to the lack of state integration measures and inadequate social welfare structures.

Already during the asylum procedure, there are hardly any opportunities for integration. Based on the author's practical experience, there are no comprehensive, genuinely accessible and state-organised integration courses for asylum seekers. At the same time, many camps are located in remote areas where access to language courses, employment opportunities or social interaction is severely limited. This makes it considerably more difficult for asylum seekers to develop skills and networks at an early stage that are needed for independent living.

After international protection is granted, this situation worsens further. Beneficiaries of international protection are obliged to leave accommodation facilities for asylum seekers within 30 days. In many cases, this period is not sufficient to find stable follow-up accommodation. Organisations regularly report cases of persons who become homeless immediately after leaving the accommodation facilities.

Existing support programmes are not sufficient to close this structural gap. The HELIOS+ programme is the only integration programme specifically aimed at beneficiaries of international protection, but it has limited capacity and is associated with significant access barriers (more information on HELIOS+ can be found in Chapter 15). The guaranteed minimum income is also difficult for many beneficiaries of international protection to access due to complex bureaucratic requirements.⁶¹ Further social benefits often require several years of residence or corresponding proof and are therefore regularly not accessible to recently recognised beneficiaries of international protection and returnees.⁶²

As a result, beneficiaries of international protection are largely left to rely on themselves, either by finding short-term accommodation through informal networks or by quickly taking up employment in order to finance housing. Even where this temporarily succeeds, even minor changes, such as the loss of a job, often result in persons becoming homeless again. A stabilising social or state safety net is largely absent.

⁶¹ RSA, *Recognised Refugees 2025*, pp. 27–28.

⁶² *Ibid.*, pp. 25–27.

Additional Risk Factors for Returnees

These structural deficits affect returnees in a particularly pronounced way. While other beneficiaries of international protection have at least had some time to orient themselves in Greece and build contacts, many returnees arrive in Greece after a longer period abroad, often without preparation and without existing networks.

Returnees are therefore especially dependent on support, but encounter a system that does not provide a safety net upon arrival. There is no state initial reception or coordinated support measures. All returnees interviewed on this issue stated that, upon arrival, they had received no information on where they could find support, accommodation or access to services.⁶³ These statements were confirmed by ISS, AFW and Meraki. In individual cases, informational material with contact details of NGOs was handed to returnees by the police, but this was partly outdated and therefore not usable.

Administrative barriers are an additional factor. In many cases, documents have expired or been lost and must be applied for again or renewed through lengthy procedures. This delays access to the labour market and ties up resources that would be needed to secure accommodation and a livelihood.

The existing support structures are unable to close this gap. State services are largely absent, homeless shelters are overburdened, and NGOs operate with limited capacity and cannot compensate for the lack of state support. Against this background, both RSA and Meraki point out that short-term accommodation solutions often do not permanently protect returnees from renewed homelessness.

Additional Assessment: On the Evidentiary Value of the Report “Home for Good?”

In several court decisions concerning returnees in German-speaking countries, the report “Home for Good?” by the Immigration Policy Lab, ETH Zurich and University College London is relied on as an indication that homelessness among beneficiaries of international protection in Greece is not a widespread phenomenon. However, the report does not support such a conclusion.

The report is based on a survey of 3,755 adults conducted between April and July 2022 and relied on a UNHCR database as of November 2021. According to the report’s own information, the persons surveyed were predominantly not recent arrivals to Greece: 96% had already been living in Greece for more than two years, while only 4% had arrived within the previous two years. 67% had been living in Greece for two to four years, and a further 29% for more than four years.⁶⁴ The report therefore essentially covers a population that had already been living in Greece for a longer period and consequently does not allow reliable conclusions to be drawn about the situation of returnees or of beneficiaries of international protection in the initial period after recognition.

In addition, even the report’s own findings do not show that housing insecurity among beneficiaries of international protection occurs only exceptionally. The report states that 52% of beneficiaries of international protection were self-accommodated, while 22% lived in camps and a further 20% were accommodated through HELIOS. In addition, 3% of beneficiaries of international protection stated that they were homeless.⁶⁵ If, even within a sample predominantly composed of persons who had been living in Greece for years, a significant proportion were still not living in independently secured housing, the report certainly cannot serve as evidence that beneficiaries of international protection in general, or returnees in particular, do not face a significant risk of homelessness.

⁶³ Interviewees 2, 3, 4, 5, 6, 7 and 8. Interviewees 1 and 9 were not asked about this.

⁶⁴ Immigration Policy Lab, ETH Zurich, University College London, Home for Good?, December 2023, p. 7, https://immigrationlab.org/content/uploads/2024/01/IPL_HomeForGood_UNHCR_2023.pdf, accessed 15 April 2026.

⁶⁵ Ibid., p. 11.

Moreover, the report provides only a snapshot for the years 2021/2022 and can be applied to the current situation only to a very limited extent. This applies all the more because the actual structural conditions for the accommodation of beneficiaries of international protection have further deteriorated since the survey was conducted.

Thus, in 2021/2022, beneficiaries of international protection were in practice often still tolerated in camps, including beyond the statutory period of 30 days after recognition. Since May 2025, however, this deadline has been consistently enforced, so that beneficiaries of international protection must regularly leave the camps within 30 days.⁶⁶ The author has also observed this in practice. As a result, significantly more persons are left without secure follow-up accommodation immediately after being granted status.

Conditions have also deteriorated significantly in the area of integration programmes. In the previous HELIOS programme, the number of registrations per quarter during the period between 2019 and September 2022, which covers the survey period of the “Home for Good?” report, was almost seven times as high as in HELIOS+ to date.⁶⁷ In six of the 13 quarters of the previous HELIOS programme, the number of new registrations also came close to the total maximum number of participants provided for under the HELIOS+ programme. In three of these quarters, it even exceeded this number, in some cases significantly.⁶⁸

Against this background, it must be assumed that the situation described in the report does not reflect the current situation, but rather reflects more favourable structural conditions under which homelessness could still be partially mitigated. Current developments, by contrast, point to an increased risk of homelessness.

Consequences of Homelessness

The available findings show that even short periods of homelessness can have serious consequences. Homeless beneficiaries of international protection and returnees are exposed to a significantly increased risk of violence and exploitation. AFW and Cribs, for example, report cases of sexualised violence against homeless women. AFW and Wave point to a significantly increased risk of becoming a victim of theft or physical assault. Interviewee 4 stated that he had been harassed and physically attacked during his time on the street. He also described his entire situation since his return to Greece as deeply degrading. At times, this placed him under such strain that he considered returning to his country of origin despite the considerable danger to his life.

In addition to direct violence, theft also has far-reaching consequences. The loss of central documents such as the residence permit often leads to lengthy procedures for obtaining replacements and significantly impedes access to work and support services. The theft of mobile phones can also cut off access to important documents, contacts and support networks, further isolating those affected.

⁶⁶ Mobile Info Team, The Ministry of Migration and Asylum must rescind the eviction order of people on the move from camps, joint statement by 35 organisations of 4 June 2025, <https://www.mobileinfoteam.org/joint-statement-camp-evictions>, accessed 18 March 2026; Efsyn, Mass Evictions from Refugee Accommodation Facilities Are Being Prepared, Greek-language media report of 6 May 2025, https://www.efsyn.gr/ellada/dikaionomata/471399_etoimazoy-n-mazikes-exoseis-apo-tis-prosfygikes-domes, accessed 18 March 2026.

⁶⁷ HELIOS 2019–2022: 39,794 registrations over 13 quarters are equivalent to approximately 3,061 registrations per quarter. HELIOS+: 2,258 registrations over five quarters correspond to approximately 452 registrations per quarter. IOM, Ministry of Migration and Asylum, HELIOS Factsheet, 30 September 2022, https://migration.gov.gr/wp-content/uploads/2022/10/HELIOS-Factsheet-September-2022-BW2_English.pdf, accessed 25 March 2026; IOM, HELIOS+ Factsheet, 28 February 2026, https://greece.iom.int/sites/g/files/tmzbdl1086/files/new_helios-general-factsheet-february-2026_english.pdf, accessed 24 March 2026.

⁶⁸ The maximum number of participants in the HELIOS+ programme is 4,323 persons. More information on HELIOS+ can be found in Chapter 15.

Mazi also reports significant effects on physical and mental health. The organisation describes the case of a returnee from Germany who, during a period of homelessness lasting several weeks, was repeatedly subjected to violence and theft, while his mental health deteriorated significantly.

Interviewee 4 also reports that many returnees find neither accommodation nor work after their arrival in Greece. According to him, he knows several persons who developed mental health problems in connection with their homelessness and were therefore unable to take up work. In some cases, those affected also began using drugs in order to cope with the living conditions. He describes the overall situation as so burdensome that some returnees leave Greece again and move on to other European countries, despite the great risk of being rejected and deported again.

These observations are also confirmed and further contextualised by professionals. The social worker from Meraki describes a frequently occurring cycle: homelessness places those affected in a permanent survival mode, which leads to a deterioration in mental health. At the same time, under these conditions, there is no possibility of taking basic steps to stabilise one's situation, such as learning the language, looking for work or building social networks. In addition, feelings of shame, especially among affected men, may make it even more difficult to seek help.

The situation is further exacerbated by the fact that existing problems reinforce one another. Once psychological distress develops, it becomes more difficult not only to escape homelessness, but also to treat this distress appropriately. Regular medication, sufficient sleep and a stable, healthy diet are almost impossible under conditions of homelessness.⁶⁹ At the same time, certain accommodation services, especially those provided by NGOs or homeless shelters, are accessible only to a limited extent for persons with mental health problems. Many programmes require that those affected be able to care for themselves or live in shared accommodation. Persons with mental health problems often do not meet these requirements and therefore have lower chances of obtaining access to accommodation, which further limits their ability to escape homelessness.

Conclusion

The available findings consistently show that homelessness in the sense of sleeping outdoors, as well as situations similar to homelessness and other insecure forms of accommodation, occur regularly among beneficiaries of international protection in Greece and are by no means limited to isolated cases. Returnees are particularly affected. The documented periods mostly range from a few days to several weeks. In individual cases, however, homelessness may also last several months or even years.

The report "Home for Good?", relied on in several court decisions, is not suitable to refute this finding. It is based on a sample consisting predominantly of persons who had already been living in Greece for several years, and therefore reflects neither the situation of returnees nor current developments under more difficult structural conditions.

The available reports also show that insecure accommodation situations are common and that affected persons often alternate between short-term accommodation and renewed homelessness. This instability can have serious consequences, particularly for mental health, while also increasing the risk of violence, exploitation and further social marginalisation.

Overall, the picture that emerges is one of a regularly occurring structural problem, and not merely isolated exceptional cases.

⁶⁹ For example, Interviewees 1, 4, 5 and 9 stated that, during periods of homelessness or when acutely threatened with homelessness, they often had access to only one meal per day.

Section III: Access to the Labour Market

Chapter 9: Legal Employment

Introduction

Against the background of the limited support structures for beneficiaries of international protection in Greece described in the preceding chapters, they are particularly dependent on securing their livelihood through employment that is realistically accessible to them as quickly as possible. This applies even more to returnees.

This chapter examines whether, and under what conditions, beneficiaries of international protection, and returnees in particular, can take up legal employment in Greece. To this end, it considers the legal requirements, the documents and registrations required, and practical obstacles that may arise from employer behaviour, lack of required proof and the difficulty of actually accessing stable employment.

Requirements for Taking Up Employment

In order to take up legal employment, a bank account and an AMA are generally required. In practice, both requirements are often difficult for beneficiaries of international protection to meet. This is due, on the one hand, to the formal requirements and, on the other, to a range of practical obstacles, in particular in proving a residential address, obtaining the required documents and dealing with the competent authorities. In addition, a bank account and an AMA can generally only be obtained once several other documents and forms of proof are already available. Access to legal employment is therefore significantly impeded. This is also reflected in the UNHCR Protection Monitoring Report 2024, according to which only 61% of the beneficiaries of international protection surveyed had a bank account and fewer than half had an AMA.⁷⁰ Additional information on the issuance of the AMA and the opening of a bank account can be found in Chapter 1.

Several organisations also report further practical obstacles. According to AFW, many employers do not hire persons who do not yet have an AMA. This finding is also supported by a report by SolidarityNow, according to which employers reject applicants already during the application process if required documents such as the AMA are missing.⁷¹ At the same time, the issuance of an AMA is usually tied to proof of a concrete job offer. Beneficiaries of international protection thus find themselves in a situation in which they can neither obtain an AMA without employment nor take up legal employment without an AMA.

Meraki also reports that employers are often unwilling to issue the confirmation of recruitment required for the AMA. In addition, some employers impose requirements for hiring beneficiaries of international protection that are not provided for by law. According to Meraki, in some cases, for example, an already active AMKA was demanded, although beneficiaries of international protection can usually only activate it after being hired. This creates a further circular barrier. According to the organisations, overcoming these obstacles often requires intensive professional support and time-consuming communication with employers, and even then is not successful in all cases. In some cases, beneficiaries of international protection lost job offers they had already received because the existing difficulties could not be resolved in time.

⁷⁰ UNHCR, Greece Protection Monitoring of Refugees - Key Findings 2024, p. 2, <https://data.unhcr.org/en/documents/details/115178>, accessed 26 March 2026.

⁷¹ SolidarityNow, The Reality of Employment for Migrant Women in Greece, 2024, p. 26: “Distinctively, a representative of an HR agency stated that ‘when a candidate, applying for a position in a hotel, misses a document such as AMA, at the interview stage, employers reject her, as they have no time to wait’”, <https://www.solidaritynow.org/wp-content/uploads/2024/02/The-Reality-of-Employment-for-Migrant-Women-in-Greece.pdf>, accessed 28 March 2026.

Particular problems also arise for returnees, who often do not have an AMKA upon return. This is a central prerequisite for taking up legal employment. Meraki stated in this regard that only 13 of the 64 returnees supported by the organisation in 2025 had an AMKA at the time of first contact with the organisation.⁷² In 51 cases, it was either not available or no longer active. This meant that a central prerequisite was missing for regular access to the public healthcare system and social benefits, as well as for taking up legal employment.

Difficulties in Finding Work

Apart from the difficulties in meeting the formal requirements for taking up legal employment, beneficiaries of international protection, and returnees in particular, also face significant structural obstacles when actually looking for work.

According to the available findings, this is mainly due to a structural shortage of jobs that are actually accessible to beneficiaries of international protection, as consistently reported by Meraki, AFW and NAOMI. As a result, beneficiaries of international protection are unable to find employment despite intensive efforts, sometimes over a period of months.

A statement by Dr Apostolos Kapsalis, referring to a UNHCR survey, points to a very low employment rate of only 30% among beneficiaries of international protection. This includes both legal employment and work in the informal economy. At the same time, the survey identifies lack of Greek language skills and the inability to find legal work as the greatest obstacles to accessing employment.⁷³ Several organisations and interviewees consistently report that lack of Greek language skills considerably impedes access to the labour market. As a result, beneficiaries of international protection are often limited to a few, mostly low-skilled activities in certain sectors such as construction, agriculture or tourism, which further narrows their employment opportunities.

The findings therefore point to significant structural restrictions in access to the labour market.

Limited Effectiveness of Support Structures

Available support structures for finding work often prove to be effective only to a limited extent. Although some NGOs offer support in finding work, ISS reports a marked decline in available support services due to reduced funding. In addition, this support often runs up against structural obstacles in access to the labour market. Drawing on several years of professional experience, one social worker reported that an estimated 90% of the asylum seekers and beneficiaries of international protection whom he had referred to programmes supporting access to the labour market did not find work.

This assessment is confirmed by the statement of Dr Apostolos Kapsalis. His statement refers to data from a UNHCR employment promotion programme, according to which even targeted labour market integration measures result in actual employment for only a small proportion of participants. An evaluation of the “Together” project implemented by the NGO Intersos shows that, out of a total of 992 participating refugees and asylum seekers, only 179 persons, corresponding to approximately 18%, were able to sign an employment contract.⁷⁴

There are strong indications that the limited effectiveness of existing support services is not primarily attributable to the support services themselves, but is mainly due to structural restrictions in access to the labour market for beneficiaries of international protection.

⁷² Internal case statistics provided by Meraki on 64 returnees supported in 2025.

⁷³ Dr Apostolos Kapsalis, *Occupational Prospects for Recognised Refugees in Greece: The Case of Somali and Palestinian Citizens*, 2025, p. 14, available in German here:

<https://directus.equal-rights.org/assets/00bab3fb-d4e1-46eb-a575-f4f20cc7cc29>, accessed 26 March 2026.

⁷⁴ *Ibid.*, p. 13.

Employer Behaviour and Circumvention of Labour Law Requirements

Another central obstacle is the behaviour of employers. Several organisations report that employers are often unwilling to employ beneficiaries of international protection in compliance with labour law requirements, even where they have the required documents.

ISS and Cribs report, for example, that employers often hesitate to provide regular employment contracts, or delay signing them, despite the requirements being met. Often, only a very small proportion of those affected actually manage to obtain formal employment. Instead, employers frequently offer only informal arrangements, for example in the form of undeclared work or only partially declared working hours.

This is also supported by the interviews conducted, in which several interviewees reported activities in which only a few hours of the actual working time were declared. The statement by Kapsalis further confirms this finding and describes a significant extent of partially declared employment in Greece. It points out in particular that fewer working hours or working days are often declared than are actually worked.⁷⁵

Where employment relationships are only partially officially declared, while the actual working conditions differ significantly from this and central labour and social security protections are thereby substantially undermined, they should not be regarded as legal employment. Such constellations are therefore classified in this report as part of the informal economy.

Low Pay and Inability to Secure a Livelihood

In addition, available employment is often not sufficient to secure a livelihood. Several organisations report that there are very few jobs that enable independent living. According to Meraki and Mazi, in particular, there are only a few jobs for beneficiaries of international protection that make it possible to live independently. ISS also reports that even where employment relationships exist, pay is often very low.

The statement by Kapsalis also refers to “persistently poor employment conditions throughout the economy”, reflected, among other things, in the erosion of basic rights, a low wage level and consequently low disposable income.⁷⁶

These findings show that even where employment is successfully taken up, it is often not sufficient to secure a livelihood in a sustainable manner.

Case Examples

The interviews conducted also confirm that legal employment is obtained only in exceptional cases, even where considerable efforts are made to search for work. The interviewees reported that they made significant efforts to find work, for example by applying directly to employers such as hotels, restaurants and supermarkets, asking organisations for support, attending job fairs and activating their personal networks, but often with only limited or no success.

Despite very favourable conditions, Interviewee 8 was unable to find a legal job within two months, although he searched intensively with considerable personal effort and with the support of several organisations. He met all legal requirements, had already worked legally in Greece and was described by a social worker supporting him as one of the most qualified beneficiaries of international protection he had encountered in his professional life. He spoke fluent English, had good knowledge of Greek, also spoke a number of other languages and had extensive work experience in Greece. Nevertheless, his search remained unsuccessful, although he would have accepted any job. He and his family

⁷⁵ Kapsalis, *Occupational Prospects for Recognised Refugees in Greece*, pp. 4–5.

⁷⁶ *Ibid.*, pp. 3–4.

subsequently had to give up their apartment and were forced to leave Greece due to financial pressure, the threat of homelessness and serious threats from third parties.

Most interviewees, even after searching for several months, only found informal work, which was either not declared at all or only partially declared. Legal employment was found in only two exceptional cases, and even then only a long time after return.

In the case of Interviewee 7, this was only possible two years after his return to Greece. After his last job in the informal economy ended, he found part-time employment in domestic care after two months of searching and after completing training in this field. However, the pay is not sufficient to cover his rent, which is very stressful for him. He is therefore intensively looking for additional work.

Interviewee 2 was also able to find legal employment after his return. However, this only became possible after more than one year, during which he had great difficulty securing his livelihood through occasional work. He had previously done informal work and eventually received an employment contract in that context, although still without health insurance.

Conclusion

Access to legal employment is significantly restricted for beneficiaries of international protection in Greece by a variety of structural and practical obstacles. These include, in particular, bureaucratic requirements and circular dependencies in obtaining the necessary documents, practical barriers in the search for work, the limited availability of jobs that are actually accessible, the limited effectiveness of existing support structures, and the circumvention of labour law requirements by employers. In addition, even where employment is found, it is often not sufficient to secure a livelihood or takes place under conditions that are not adequately protected by law.

For returnees, these difficulties arise in a particularly acute form. After return, they often find themselves in an especially precarious situation and frequently do not initially have the documents required to take up legal employment, or can obtain or reactivate them only with considerable difficulty. They therefore regularly have no realistic prospect of taking up legal employment in the period after return. Even beyond this initial period, legal employment appears to succeed only in individual cases, usually only after a longer period of time, and not necessarily in a form that enables them to secure their livelihood sustainably.

Chapter 10: Access to Informal Work

Introduction

Where access to legal employment fails because of formal and practical obstacles, the possibility of informal work becomes central for many beneficiaries of international protection. In assessing actual employment prospects, however, it is not sufficient merely to establish whether such work exists in principle. What is also decisive is under what conditions it is accessible, how long the search for work may take, and whether employment found in this way provides a realistic basis for securing a livelihood.

This chapter therefore examines access to informal work for beneficiaries of international protection, and for returnees in particular. It considers both documented cases in which people were able to find work and difficulties in the search for work, as well as specific access barriers for returnees.

Access to Informal Work for Beneficiaries of International Protection

Most of the organisations interviewed are aware of cases of beneficiaries of international protection engaged in informal work.⁷⁷ At the same time, they report that access to such work is generally neither quick nor reliable, but usually requires a lengthy and intensive search for work. The social worker from Meraki specified that it normally takes several months and that it is rare for someone to find employment in less than two months.

Access to Informal Work for Returnees

Data shared by Meraki on the income situation of returnees do not support the assumption that returnees find prompt access to informal work after their return.⁷⁸ The data reflect the situation at the time of first contact with Meraki. This contact took place, on average, several weeks after return to Greece. Of the returnees recorded, 49 out of 64 had no income, only three were employed full-time but without insurance, and a further five earned only sporadic income from occasional or day labour. In addition, two returnees received support from NGOs, while five were supported by family or friends. The data therefore constitute a strong indication that the overwhelming majority of returnees have no income at all in the initial phase after their return and cannot in fact secure their livelihood through informal work.

The greater difficulty accessing the informal economy is likely to be primarily attributable to the particular living circumstances of returnees after their return. Because of their longer absence from Greece, they are often at a disadvantage because they lack established networks. However, the lack of networks, alongside lack of language skills, is one of the most important obstacles in the search for work,⁷⁹ which significantly reduces returnees' chances of successfully finding work, including informal work.

In addition, returnees often find themselves in precarious living conditions or homelessness. Under these conditions, a considerable part of the available time and energy must be spent securing basic needs such as food, hygiene and accommodation. The associated strain and constant pressure to meet basic needs further impede the search for work.

Effort and Duration of the Search for Work

The returnees interviewed consistently report considerable difficulties in finding work. Since all of them depended on income from employment, they made considerable efforts to find work. They approached potential employers such as hotels, restaurants and supermarkets in person, sent

⁷⁷ ISS, Meraki, Mazi, AFW, Choosehumanity, Wave and Cribs

⁷⁸ Internal case statistics provided by Meraki on 64 returnees supported in 2025.

⁷⁹ Kapsalis, Occupational Prospects for Recognised Refugees in Greece, p. 13.

applications, contacted organisations, attended job fairs and tried to obtain access to employment through personal contacts.

Interviewee 8, whose unsuccessful search for work has already been described, stated that he searched intensively for employment, including in the informal economy, because of his acute need to secure an income. Although he was willing to accept any kind of work, he did not manage to find such employment within two months.

Mazi reports the case of a young man affected by displacement who searched unsuccessfully for stable employment in the construction sector for several months. Despite having a good personal network, he was able to obtain work only on a few isolated days, which was far from sufficient to secure his livelihood.

Interviewee 3, who has work experience in the restaurant sector, found employment comparatively quickly, namely after six weeks. This may have been facilitated by his relevant work experience and by his targeted search among Arabic-speaking restaurant owners. All other interviewees either found no work, such as Interviewees 6 and 8, or searched for work for at least two months, in some cases four months or longer.

These long search periods are particularly burdensome for returnees, who often have neither savings nor viable support structures. This significantly increases the risk of remaining in precarious accommodation situations or of becoming homeless. The resulting acute pressure to secure an income increases the risk that they will have to accept exploitative or otherwise unacceptable working and housing conditions.

In addition, the search for work is not a one-off issue. Several interviewees had to search for work again after short-term or insecure employment ended. The available findings therefore indicate that even when people succeed in taking up informal work, this often does not lead to stable employment prospects. Instead, affected persons may repeatedly move between short-term employment and renewed unemployment. The structural instability of such employment relationships is described in more detail in Chapter 14.

Conclusion

The available findings show that informal work is possible in principle for beneficiaries of international protection, but that this does not mean that access to employment is either prompt or secure. For returnees, access is made additionally difficult by the lack of networks, precarious living conditions and the acute pressure to secure basic needs that is often associated with return.

Instead, taking up such work often requires a lengthy and intensive search for work and, even where successful, frequently leads only to short-term, unstable and insecure sources of income. For returnees, there is therefore regularly no realistic prospect of securing their livelihood in the foreseeable future through informal work.

Chapter 11: Language Skills and Access to Employment

Introduction

A number of interviewed organisations as well as interviewed returnees emphasise the great importance of language skills for finding and taking up work.⁸⁰ Organisations such as Meraki and AFW both report that a lack of Greek language skills significantly impedes access to the regular labour market as well as the informal economy. At the same time, it should be taken into account that in some sectors, work can also be taken up without Greek language skills or with only rudimentary Greek language skills. Against this background, this chapter examines different sectors of work in terms of the language skills required in practice.

Sectors Involving Heavy Physical Work

According to the available findings, finding work without Greek language skills or with only rudimentary Greek language skills appears possible primarily in sectors involving heavy physical work, such as construction or agriculture. According to Meraki, access is most likely where it is arranged through personal contacts, for example through compatriots or acquaintances who are already working in the relevant sector.

The interviews conducted with returnees also confirm this. For example, after months of searching and with the help of an acquaintance, Interviewee 9 found precarious work as a removal helper. This occurred only around one and a half years after his return to Greece. Interviewee 1 and Interviewee 7 also obtained short-term work as harvest workers. In both cases, this occurred before they left Greece. In the case of Interviewee 7, this happened during his stay in a camp; in the case of Interviewee 1, through personal contacts.

At the same time, the interviews show that even in sectors such as construction, lack of language skills can significantly impede access. For Interviewee 4, it was not possible over a longer period to find employment in these sectors because he had neither Greek nor sufficient English language skills. Despite considerable efforts and an urgent need to find work, he remained unemployed during the first four months after his return to Greece.

Hospitality and Food Service

In the hospitality sector, by contrast, Greek language skills appear to play a more important role. Interviewee 1, who has good English language skills and was looking for employment in restaurants or hotels, was repeatedly rejected on the grounds that she did not speak Greek. Only after about two months did she find precarious work as a dishwasher and cleaner. Interviewee 5, who also has good English language skills, had a similar experience and found similarly precarious work in the hospitality sector only after more than two months.

Interviewee 7 also reports a difficult search for work in the hospitality sector due to lack of language skills. He found employment only after several months and with the help of an acquaintance.

Interviewee 3 is a special case in this respect, as he specifically approached Arabic-speaking restaurant owners given his experience in Arabic cuisine.

These individual cases indicate that even for simpler activities in this sector, at least basic Greek language skills are often expected. English language skills can be helpful in individual cases, but do not reliably compensate for a lack of Greek language skills.

⁸⁰ ISS, Mazi, Meraki, AFW and Interviewees 1, 4, 5 and 7.

Tourism, Domestic Services and the Textile Industry

The available statements from ISS and AFW suggest that, in the tourism sector, simple forms of informal work may also be accessible without Greek or English language skills. ISS reported cases of this kind involving male returnees. AFW also pointed out that simple activities in the tourism sector do not necessarily require Greek or English language skills.

AFW reports that access to employment in domestic work, including care work and housework in private households, is difficult without Greek language skills. Since these activities are often more communication-intensive, this observation appears plausible.

According to NAOMI, Greek language skills are generally a central prerequisite for access to employment in the Greek textile industry. English can be helpful, but does not reliably compensate for a lack of Greek language skills. The high need for precise communication, the small-scale nature of many businesses, the lack of interpretation or language support, and the need to understand workflows and instructions make language skills an essential requirement for access to this sector. Without the necessary language skills, employment opportunities exist at most in individual cases.

Conclusion

In summary, work without language skills or with only rudimentary language skills occurs primarily in construction, agriculture and, in some cases, tourism under certain conditions, but access often depends on personal networks. In other areas, particularly hospitality, the textile industry and domestic services, language skills generally appear to be required.

Chapter 12: Gender-Specific Differences in Access to the Labour Market

Introduction

This chapter focuses on the question of whether employment opportunities differ for men and women and whether women face particular disadvantages in accessing employment. It first examines women's access to specific sectors of work. It then addresses structural access barriers. In addition to the interviews conducted as part of this research, a study by SolidarityNow is used as a supplementary source. The study examines the employment situation of female beneficiaries of international protection and asylum seekers. Since the majority of the women surveyed were beneficiaries of international protection, the study is particularly relevant to the question examined here. It also contains detailed findings on gender-specific labour market barriers and sectors of employment.

Access to Construction, Agriculture and Factories

While male beneficiaries of international protection are comparatively more likely to find employment involving heavy physical labour, this is far less often the case for women. However, according to the organisations interviewed, these are precisely the sectors in which employment is most likely to be possible even without language skills or with only limited language skills, particularly in the construction sector. In practice, however, this sector is largely inaccessible to women.

The same applies to agriculture. Although there are individual reports of women taking up precarious work in this sector, overall there are strong indications that agriculture is far less accessible to women than to men. This assessment is also supported by the information provided by Cribs, according to which women are rarely active in agriculture. In addition to the physically demanding nature of the work, access to agricultural employment is often associated with significant practical obstacles. Available work often requires short-term travel to rural regions. According to NAOMI, it is primarily young men who undertake such internal labour migration despite the uncertainties associated with it.

For women, there are additional restrictions in this regard. For women with children in particular, such short-term and location-bound work is generally not realistic, as it is difficult to reconcile with care responsibilities.

In addition, the working and accommodation conditions in this sector often do not take women's safety and privacy needs into account. Meraki points out that these situations may be associated with increased risks for women, particularly with regard to harassment, exploitation or sexualised violence. This is confirmed by the statement of Interviewee 1. She reports that the accommodation during the orange harvest was shared by men and women and that there was no private space to withdraw to. Because she feared assaults, she left the work after one week and received no payment for the work she had performed.

The fact that women are actually active in agriculture only to a very limited extent is also supported by a 2024 report by SolidarityNow on the employment of female beneficiaries of international protection and asylum seekers in Greece.⁸¹ This report found that only 5% of the women surveyed work in agriculture.⁸²

With regard to employment in factories, too, AFW and Meraki report only individual cases in which women have taken up such work. According to the information provided by the organisations

⁸¹ SolidarityNow, *The Reality of Employment for Migrant Women in Greece*, p. 14: According to the report, 61% of the women surveyed are recognised refugees and 35% are asylum seekers.

⁸² *Ibid.*, p. 28, Diagram 11. The diagram is only partially legible because of the way it is reproduced. It is nevertheless apparent that 5% of the women surveyed in Greece were employed in "Agriculture, forestry and fishing" and 5% in "Manufacturing", while 26% were employed in "Accommodation and food service activities".

interviewed, employment in this sector usually takes place on the basis of an official employment contract and therefore generally requires that the persons concerned meet the formal requirements for legal employment, in particular the necessary registrations (e.g. AMA, bank account). For this reason alone, this sector cannot be considered meaningfully accessible to women as a low-threshold employment opportunity.

The SolidarityNow study also supports the limited actual significance of this sector for women. According to the study, their employment rate in manufacturing is only 5%, which further underlines women's overall limited access to this sector.⁸³

Access to Tourism, Hospitality and Domestic Work

The organisations interviewed report that women are comparatively more likely to find employment in tourism, hospitality and domestic work. However, this does not mean that they have reliable access to the labour market or access that enables them to secure a livelihood. Employment opportunities in tourism are often limited to the relevant season. According to Meraki, particularly problematic working conditions are frequently reported from the tourism sector.

Although the organisations interviewed report comparatively few concrete findings on women's employment in hospitality, the SolidarityNow study suggests that the hospitality sector is in fact of considerable importance for women. According to the study, the largest share of the women surveyed, 26%, work in this sector.⁸⁴

Employment opportunities for women also exist in private households, in particular in childcare or comparable activities. Meraki, Cribs and AFW report female beneficiaries of international protection working in this area. The SolidarityNow study also points to the significance of care-related and household-related activities: 19% of the women surveyed were employed in personal care activities, while a further 15% worked in activities in which private households act as employers and which also include domestic work.⁸⁵ However, it is precisely in this area that several of the organisations interviewed for this report repeatedly described serious abuses and specific dependency relationships, which are addressed in more detail in Chapter 17.

Language Skills as an Access Barrier

Work in the construction sector, agriculture or factories is, in practice, often accessible to female beneficiaries of international protection only to a limited extent. The employment opportunities more likely to be open to them are concentrated in areas such as tourism, hospitality and domestic work. At least in hospitality and domestic work, however, it is often precisely the language and communication skills that many of those affected do not possess that are required.

This is supported by the SolidarityNow study, according to which 95% of the women surveyed state that knowledge of the Greek language is important for access to the labour market.⁸⁶ Employers interviewed also emphasise in particular the importance of language and communication skills.⁸⁷ At the same time, the study shows that access to language acquisition is structurally limited: although almost 60% of the women surveyed had already been living in Greece for three or more years and 31.5% even for more than five years,⁸⁸ only 19.6% stated that they speak Greek.⁸⁹

⁸³ SolidarityNow, The Reality of Employment for Migrant Women in Greece, p. 28, Diagram 11.

⁸⁴ Ibid., p. 28

⁸⁵ Ibid.

⁸⁶ Ibid., p. 20

⁸⁷ Ibid., p. 26

⁸⁸ Ibid., p. 14, Diagram 6.

⁸⁹ Ibid., p. 18

Structural Labour Market Disadvantages for Women

The SolidarityNow study shows that women affected by displacement predominantly gain access to precarious employment relationships that often do not reflect a free choice of profession, particularly in the care and service sectors. These activities mainly include domestic care, childcare, cleaning work and low-skilled activities in tourism and hospitality, and are regularly characterised by instability, low pay and a lack of labour-law protection.⁹⁰ This suggests that in many cases this is not a matter of free professional choice, but rather a structural concentration in certain labour market sectors that are marked by labour shortages and are at the same time precarious.

According to the study, young women aged 17 to 29 are particularly exposed to risks in accessing the labour market, as they often left their countries of origin at a young age and therefore frequently could neither complete their education nor acquire sufficient professional experience.⁹¹

At the same time, the study points to an increased vulnerability to exploitation, particularly in jobs with low qualification requirements.⁹² It assesses the situation of the women concerned as a form of “dual burden of discrimination,” based on their origin and gender, which further weakens their position in the labour market.⁹³

Contextualising the Study Findings with Regard to Female Returnees

At the same time, the findings of the study must be contextualised in light of the composition of the study population. The women surveyed had predominantly already been living in Greece for a significant period of time. Compared with female returnees, they therefore had significantly more favourable conditions, particularly with regard to language skills, knowledge of the administrative system and the possibility of building networks. In addition, many of them were connected to support structures and received professional support from SolidarityNow, including in accessing the labour market.⁹⁴

Despite these comparatively favourable conditions, half of the women surveyed in the study stated that they had worked without a contract or insurance in the previous year.⁹⁵ This underlines that, even under more favourable conditions, no secure and sustainable access to the labour market is apparent for a substantial proportion of women.

Against this background, it must be assumed that the situation is considerably more difficult for female returnees, who typically have to re-establish themselves in Greece without existing networks, without access to support structures and often without up-to-date knowledge of the administrative system. The structural problems described in the study are likely not only to continue in these cases, but to be significantly intensified.

Conclusion

Overall, the available evidence clearly suggests that the employment opportunities of women and men in Greece differ considerably. While male beneficiaries of international protection are comparatively more likely to have access to low-threshold work in physically demanding sectors such as construction and agriculture, in practice, women are much more often limited to language-dependent, precarious work in the service, tourism and care sectors, where the risk of exploitation is particularly high. For female returnees, these disadvantages are further exacerbated, as they regularly lack networks, language skills, childcare options and access to support structures.

⁹⁰ Ibid., p. 23

⁹¹ Ibid., p. 16

⁹² Ibid., p. 29

⁹³ Ibid., p. 23

⁹⁴ Ibid., p. 12

⁹⁵ Ibid., p. 18

Section IV: Conditions in Informal Work

Chapter 13: Working Conditions in Informal Work

Introduction

The following first presents the working conditions in informal work described by the interviewees. This presentation is structured by sectors of work, as the interviewees described their experiences in relation to specific activities. This is then supplemented by a presentation of general working conditions in informal work based on the reports of the organisations interviewed.

Agriculture

Interviewee 1 worked in the orange harvest during the summer before leaving Greece. The agreed pay was EUR 20 per day plus accommodation, and the agreed duration of employment was one month. The accommodation was shared by men and women, without any private space to withdraw to and without sanitary facilities. After leaving the work for this reason after one week, she was not paid for the work she had already performed.

Interviewee 7 also worked temporarily in agriculture before leaving Greece. He did not provide specific information on the amount of pay or the duration of employment. However, he stated that the working conditions and accommodation had been poor, that he had to work unpaid overtime and that, from his perspective, the work had a coercive nature.

Other Physically Demanding Sectors of Work

Interviewee 4 works on a construction site and carries materials such as mortar, cement and bricks to the required floors. He describes the work as physically very demanding. A working day lasts around 12 hours, for which he receives EUR 50. He works on call and is asked to work on average once or twice per week. At the time of the interview, however, he had not been offered any work for two weeks.

Interviewee 9 helps with the transport and delivery of items such as refrigerators, tables or chairs. He receives EUR 30 per working day. He also works on call and works on average around two days per week. However, the work is unreliable, and there are periods when he receives no work for several weeks.

Interviewee 2 worked in skilled manual work. The work was irregular. At times, he was able to find only around one working day every ten days. He did not provide information on the amount of pay. He has since found legal employment in the same business. He already had previous experience in skilled manual work in his country of origin.

Restaurant Work

Interviewee 1 works as a dishwasher and cleaner and receives a monthly wage of EUR 450. She works six days per week, nine hours each day from Tuesday to Friday and ten hours on Saturdays and Sundays. She states that she has an employment contract, but can be dismissed at any time. The lack of the documents necessary for regular employment, as well as the wage level and working hours described, indicate that the employment was not fully or properly declared.

Interviewee 5 worked as a dishwasher and cleaner in a restaurant. For eight hours of work, he received a daily wage of around EUR 20 to 25. He reports regular overtime and states that he often worked ten to twelve hours per day. He had an employment contract, but could be dismissed at any time and had no health insurance. In this case, too, the very low pay and the high number of hours actually worked indicate at least partially undeclared employment.

Interviewee 7 worked in a restaurant for eight hours per day and received EUR 48 per day. Four of the eight hours were officially declared, while the remaining four hours were performed informally.

Interviewee 3 worked as a cook in a restaurant. He worked nine hours per day and received EUR 40 per day. Formally, he had a part-time contract for two hours, but in fact worked full-time. He did not provide information on how many days per week he worked.

Range of Pay

With regard to pay in informal work more broadly, Meraki reports typical daily wages in the range of EUR 30 to 40. Wave and ISS refer to hourly wages of up to EUR 5, but in some cases also below EUR 3. In addition, Wave reports daily wages of around EUR 40.

The accounts of the interviewees confirm this range and refer to daily wages between EUR 20 and 50, often amounting to an hourly wage of less than EUR 5.

Working Hours

With regard to working hours in the informal economy in general, Meraki reports that agreed working hours are frequently substantially exceeded. For example, originally agreed working hours of 8 or 9 hours may be extended to up to 15 hours per day. Choosehumanity reports a case in which working hours were up to 14 hours per day. Wave also reports that working hours in informal employment sometimes significantly exceed the statutory maximum working hours.

This is confirmed by the interviewees' accounts, in which excessively long working hours and unpaid overtime are repeatedly described.

Accommodation Linked to Employment

Both interviewees and the organisations interviewed report accommodation provided in connection with work in agriculture, the tourism sector or domestic work. Very poor living conditions are described for agriculture and the tourism sector. In the area of domestic work, organisations also report an increased risk of dependency relationships as well as sexualised violence and exploitation. This aspect is addressed in more detail in Chapter 7, "Accommodation Linked to Employment".

Seasonal Fluctuations

Work opportunities in agriculture, construction and the tourism sector are described by the organisations interviewed as strongly seasonal.

ISS and Mazi report that construction activity is in some cases significantly restricted during the summer months because of the high temperatures and is concentrated in spring and autumn.

According to ISS, employment in the tourism sector is predominantly available between May and October. AFW also confirms that most activities in this sector end in autumn and that there are virtually no work opportunities during the winter months.

Chapter 14: Abuses and Risks in Informal Work

Introduction

This chapter examines the burdens and risks for beneficiaries of international protection and returnees arising from conditions in informal work. It focuses in particular on questions of pay, working hours, the stability of employment relationships, power imbalances and dependency relationships, protection in the event of illness or workplace accidents, and specific risks for women.

Low Pay

AFW points out that access to better-paid work generally requires Greek or English language skills. Meraki reports that few forms of informal work enable an independent livelihood. The hourly and daily wages set out in Chapter 13 support this assessment. Many of the reported wages are either already very low in themselves or, due to irregular employment, result in monthly or annual incomes that are significantly below the at-risk-of-poverty threshold.⁹⁶ They are therefore generally not sufficient to secure a livelihood on a sustainable basis. This applies all the more in view of rising living costs, particularly for rent and basic needs.

It is true that some reported hourly or daily wages could, if employment were regular, lead to an income above the at-risk-of-poverty threshold. The decisive factor, however, is the combination of low or, at best, limited pay and a high degree of insecurity. A daily wage of EUR 50 for day-paid work may appear comparatively high when considered in isolation. However, when irregular employment, longer periods without being offered work, as reported by several interviewees, and seasonal unemployment are taken into account, even such a daily wage is generally not sufficient to cover basic needs in the long term.

Wage Reductions and Non-Payment of Wages

Numerous organisations and interviewees report wage reductions or, in extreme cases, the complete non-payment of wages. The frequency of these reports indicates that these are not isolated cases.

Meraki reports, for example, cases in the construction and agricultural sectors in which employers unilaterally reduced the agreed daily wage from EUR 50 to EUR 40 or EUR 30, as well as cases in which wages were withheld entirely. AFW reports similar practices and states that it has repeatedly intervened in situations in which agreed wages were not paid. Cribs and Choosehumanity also report cases in which beneficiaries of international protection worked for weeks without pay in bakeries, restaurants or construction in an informal “trial period” and were then dismissed without remuneration.

Interviewees also describe corresponding experiences. Interviewee 1 left agricultural work early because of unacceptable accommodation conditions, after which she was refused payment of the wages she had already earned.

In addition to the full or partial withholding of wages, unpaid overtime is also widespread. This is confirmed both by organisations such as Meraki and AFW and by Interviewees 3 and 9. Interviewee 9 describes that his employer deliberately exploits the dependency of the workers: because alternative employment opportunities are lacking, many feel compelled to accept additional working hours without pay. Despite repeated attempts, neither he nor his colleagues succeeded in finding alternative employment.

⁹⁶ According to ELSTAT, the at-risk-of-poverty threshold was an annual income of EUR 7,020 for a single person. This is equivalent to twelve monthly incomes of EUR 585: Hellenic Statistical Authority (ELSTAT), Risk of Poverty and Social Exclusion, 2025 Survey on Income and Living Conditions, report of 19 March 2026, p. 3, <https://www.statistics.gr/documents/20181/30dc21b1-d0b6-feb9-beca-62e75e6b0d86>, accessed 27 May 2026.

Excessively Long Working Hours

The pronounced power imbalance between employers and workers is also evident in relation to working hours. Agreed working hours are frequently unilaterally extended or completely disregarded. Meraki reports cases in which, instead of the agreed 8 or 9 hours per day, up to 15 or 16 hours of work were required.

The accounts of the interviewees also confirm this pattern. Interviewee 1 regularly works 56 hours per week, while Interviewee 4 performs physically very demanding work in construction for around 12 hours per day. Interviewee 5 also reports working days of up to 12 hours. After finishing work only after midnight and a one-hour journey home, he often had only 4 to 5 hours of rest before having to return to work again at 8 a.m. the next morning.

These working hours are often accompanied by unpaid overtime and illustrate that minimum labour law standards, particularly regarding maximum working hours and rest periods, are systematically circumvented in the informal economy.

Incorrectly Declared Employment Relationships

Cribs reports that full-time employment is often declared only as part-time employment, which significantly reduces the workers' rights and protections. A social worker from the organisation stated that in more than 90% of the cases she reviewed, the officially registered contractual conditions did not correspond to the actual working situation. In most cases, in particular, the daily working hours were declared as considerably fewer than those actually worked.

This is also confirmed by the interviews with returnees conducted as part of this research. All four interviewees employed in hospitality either stated that their employment relationships had been incorrectly declared or described working conditions that clearly indicate incorrect or incomplete declaration. In some cases, there are clear indications that they were not informed about the actual declaration of their employment. Interviewee 3 only found out after some time that his full-time employment had been declared for only two hours per day. Interviewee 1 assumes that she is formally employed. However, the pay and working hours she describes, as well as the absence of essential documents, clearly indicate that her employment was not properly declared.

According to AFW and Cribs, this practice means that those affected are insufficiently protected not only in the event of unemployment, but also lose statutory entitlements, for example to additional monthly salaries or leave. The effects are also visible at the individual level: after the end of his employment in hospitality, Interviewee 7 was not entitled to unemployment benefits because he had been registered only for a few hours instead of a full-time position. During his three months of unemployment, he had to use up all his savings and additionally ask acquaintances for financial support.

Unstable and Seasonal Employment

A central feature of employment relationships in the informal economy is their structural instability. Employment is often short-term, irregular and not covered by effective protection against dismissal. Much of this work consists either of one-off day jobs or of work on only a few days per week, as reported by, among others, Mazi, Meraki and several interviewees.

Interviewees 2, 4 and 9 consistently state that they were only able to work infrequently and in some cases were offered no work for weeks. Such gaps make it almost impossible to plan ahead reliably and lead to persistent uncertainty regarding one's own financial survival. At the same time, the decision on the amount and frequency of work lies largely with the employers.

Even employment relationships that are not arranged as day jobs often show no greater stability. Interviewee 7 has been back in Greece for two years. During this time, he had several different jobs in the informal economy or in partially declared employment relationships, none of which lasted longer than six months. The repeated periods of unemployment could mainly be bridged because he was accommodated in NGO housing during this time.

Seasonal employment, particularly in agriculture and the tourism sector, further exacerbates this insecurity. Wave reports that many beneficiaries of international protection are continuously looking for work and often have to change their place of residence for short-term jobs, for example on islands or in agricultural regions. This requires not only a high degree of flexibility, but is also associated with considerable practical and financial effort. Travel and accommodation often have to be organised and paid for in advance at short notice. At the same time, there is a significant risk that the expected income will not actually be received in whole or in part, for example due to dismissal, wage reductions or non-payment.

The repeated changes of location also lead to unstable housing situations, as existing accommodation has to be given up and new housing has to be found upon return, which increases the risk of homelessness. In addition, the seasonal nature of many jobs leads to longer periods of unemployment. According to AFW, many women supported by the organisation are without income for months after the end of the tourism season and are forced to survive with very limited financial means.

Specific Risks for Women in Informal Work

Women in informal work are exposed to an increased risk of sexual harassment and sexualised violence. Such incidents can have additional serious consequences for those affected, including unwanted pregnancies, and further exacerbate their already precarious living situation. According to the available reports, this risk increases particularly where employment is organised informally, personal dependency relationships exist, and those affected depend on the goodwill of individual persons when looking for work or seeking to remain employed. The reports indicate that, especially in such constellations, sexual acts may be demanded or assaults may be facilitated. At the same time, fear of job loss or other negative consequences makes it more difficult to report such incidents. Further details are set out in Chapter 17.

While pregnant women in regular employment relationships are legally protected against dismissal⁹⁷ and are entitled to maternity leave,⁹⁸ these protection mechanisms often do not exist in practice in precarious or informal work arrangements. This has serious consequences, as women lose their source of income during a phase of particular vulnerability.

Cribs reports a current case of a single pregnant woman whose work as a cleaner and dishwasher was terminated when her employer became aware of her pregnancy in the seventh month. As a result, she was no longer able to pay her rent and would most likely have become homeless if she had not been admitted by Cribs.

⁹⁷ In Greece, termination by the employer of a female employee's employment contract is generally prohibited during pregnancy and for a period of eighteen months after childbirth: Ministry of Labour and Social Security, Protection Against Dismissal, Greek-language website, <https://ypergasias.gov.gr/ergasiakes-scheseis/atomikes-ergasiakes-sxeseis/prostasia-apo-apolisi/>, accessed 24 May 2026.

⁹⁸ In Greece, a total of 17 weeks of statutory maternity leave is provided, 8 weeks before and 9 weeks after childbirth: Labour Inspectorate, Maternity Leave, Greek-language website, <https://www.hli.gov.gr/ergasiakes-scheseis/nomothesia-ergasiakes-scheseis/adeies-ergasiakes-scheseis/adeies-gia-tin-prostasia-tis-oikogeneias/adeia-mitrotitas-adeia-toketou-kai-locheias/>, accessed 6 May 2026.

According to Cribs, such cases are not exceptional. In the informal economy, pregnant women frequently lose their work and thus their livelihood, which can lead to homelessness or a significant risk of homelessness.

The social worker from Cribs also emphasises the structural difficulties for women affected by displacement in actually accessing maternity protection. In her six years of work supporting pregnant women and mothers, she has encountered only a single case in which a woman was actually able to take maternity leave. This illustrates the significant barriers to accessing genuinely protected employment relationships with basic labour law protection mechanisms.

In addition, AFW, Meraki and Cribs consistently report significant difficulties in combining childcare and employment. According to Cribs, there are far from enough places available in public kindergartens. Private childcare services usually cost around EUR 300 per month and are therefore unaffordable for many beneficiaries of international protection.

As a result, many women are forced to rely on paid, informal and often unregulated childcare arrangements, for example through persons from their community. These solutions are often associated with additional risks, as they lack supervision, qualified staff and reliable structures. At the same time, they increase the organisational and financial pressure on those affected.

Beyond the lack of childcare places, labour market requirements, particularly shift work, early working hours or short-notice availability, are difficult to reconcile with existing childcare structures. This also applies to women with school-age children, as working hours are often incompatible with school hours. According to AFW, part-time jobs that would allow for such reconciliation are also difficult to find.

Under these conditions, many mothers resort to informal work arrangements that allow a certain degree of short-term flexibility. However, precisely these forms of employment are associated with a lack of legal protection, increased insecurity and a heightened risk of exploitation and abuse.

Power Imbalance and Dependency

The abuses reported in informal work are largely an expression of a pronounced power imbalance between workers and employers. AFW and Meraki independently emphasise that beneficiaries of international protection in informal work often are in a vulnerable and marginalised position, as they are frequently under considerable pressure to secure an income. At the same time, they encounter a largely unregulated labour market in which the enforcement of rights is almost impossible in practice. This is particularly evident in relation to working hours, pay and other working conditions: many of those affected accept even unacceptable conditions because they urgently depend on the income.

According to Meraki, such exploitative situations occur regularly, particularly in the tourism sector. Those affected often have little real choice but to accept such conditions: in order to take up a job, they have already incurred considerable financial and organisational costs, for example for travel or accommodation. At the same time, the pressure to earn an income is particularly high. Under these conditions, leaving the job or changing jobs is often almost impossible. The same applies to labour migration in agriculture or other sectors.

In addition, workers are repeatedly reminded of their replaceability in order to stabilise the existing power relationship. Interviewees 1, 3 and 5 report that, in their partially declared jobs in hospitality, it was made clear to them that they could be dismissed at any time without any reasons being given.

There are also targeted forms of intimidation. According to Meraki, those affected report threats by employers that, if they caused “problems”, they would no longer find work anywhere in the region.

This power imbalance is also clearly visible when it comes to reporting violations of rights. According to Meraki, such violations are hardly ever reported because those affected fear losing their urgently needed job. Cases have also been observed in which employers threatened workers that, if they reported labour law violations, they themselves would have to fear criminal consequences because they were working without a contract. This dynamic means that responsibility is effectively shifted onto those affected themselves, so that violations of rights are not only rarely reported, but existing exploitative relationships are further stabilised.

The power imbalance leads not only to individual violations of labour law, but also keeps many of those affected in a situation of legal and practical powerlessness. A number of interviewees describe a feeling of deep helplessness and degradation.⁹⁹ The burden arises from the interaction between exploitative working conditions and the precarious living conditions that they produce.

Lack of Protection in the Event of Illness or Workplace Accidents

Informal work can have immediate and serious consequences in the event of illness or workplace accidents. The fact that three out of nine interviewees report such situations indicates that these are not merely isolated cases.

Interviewee 5 suffers from recurrent back pain, which means that he should not actually perform heavy physical work. Due to financial constraints, he nevertheless worked full-time as a dishwasher and cleaner in a restaurant. After one month, the pain became so severe that he could no longer continue working. Since he had neither an entitlement to paid sick leave nor employment-related health insurance coverage, he had no choice but to give up his work. As a result, he accumulated debts of more than EUR 4,000 and is at risk of homelessness, as he can neither find new work nor pay the rent for his room.

Interviewee 3 suffered a workplace accident in which he severely injured his arm. His employer not only refused to support him in accessing medical care, but dismissed him without notice because he was unable to come to work for two days. At the time of the interview, he was still unemployed and dependent on financial support from his brother.

The consequences of the lack of protection become particularly clear in the case of Interviewee 4. While working in construction, he fell from an unfinished building and seriously injured his leg. Due to the absence of an AMKA, he was unable to see a doctor or go to a hospital. A co-resident in the unofficial hostel where he was living provided makeshift care for his injury. For more than six weeks, he could neither walk nor work and was entirely dependent on the support of his co-residents. During this time, he was in severe pain and could hardly sleep because of the injury and the poor housing conditions.

Although he was still in pain when walking at the time of the interview, he was forced to resume his work on the construction site, as otherwise he would not have been able to secure his basic survival.

Severe Exploitation

Several organisations report cases in which conditions in the informal economy clearly amount to severe exploitation. AFW points in particular to forms of exploitation that often remain invisible in the area of domestic work. Women work there as cleaners, housekeepers or in childcare, often without a contract and under conditions that are difficult to monitor. These forms of exploitation often remain hidden, as those affected live and work in their employers' households.

⁹⁹ Interviewees 1, 3, 4, 5 and 9.

Cribs reports a case in which a single mother of a young child in Athens worked around the clock for a family and cared for four children seven days a week, without pay and only in exchange for accommodation. Cribs described this case as involving “slavery-like conditions”.

Mazi witnessed a case in which a returnee from Germany renovated an apartment after having been given a firm assurance that he would then be able to live there. After the work had been completed, the owner changed the lock and called the police. The person concerned was then homeless for several weeks. During this time, he was the victim of physical assaults, and his mental health deteriorated significantly.

Choosehumanity also reports a case in which a beneficiary of international protection accepted a job as a gardener on one of the Greek islands through an employment agency. There, he had to work up to 14 hours a day and received a monthly wage of EUR 500. He was prohibited from leaving the premises, which were also secured by fences and barbed wire. He slept on a mattress in a garage and received food only once a day. After one month, he managed to leave the workplace.

Although these cases are likely to be particularly extreme manifestations, they illustrate the increased risk of severe exploitation in the informal economy. This is facilitated in particular by the existing power imbalance and the economic hardship of those affected.

Conclusion

The lack of enforceable rights that characterises many informal work arrangements has concrete and serious consequences for beneficiaries of international protection and returnees. Frequently occurring problems include not only wages below the at-risk-of-poverty threshold, unpaid or reduced wages, excessively long working hours and unstable employment relationships, but also a far-reaching lack of protection against arbitrary changes to working conditions, dismissal, intimidation and exploitation. The lack of protection in the event of workplace accidents or illness in particular can have grave consequences for those affected.

For women, there are additional specific risks, particularly with regard to sexual harassment and sexualised violence, lack of maternity protection, and the difficulty of reconciling employment and childcare. These abuses are reinforced by a pronounced power imbalance and the strong dependency of those affected on their employers, which considerably increases the risk of degrading treatment and severe exploitation.

Section V: State Support Programmes

Chapter 15: HELIOS+ and the Bridging Programme

Introduction

The HELIOS+ project is the only support programme available in Greece that was specifically designed for beneficiaries of international protection. This chapter examines whether HELIOS+ is actually accessible to beneficiaries of international protection and returnees, and to what extent it can provide support with employment and accommodation.

In addition, the final subsection presents the bridging programme for returnees from Germany. This programme is relevant to the assessment of HELIOS+ because it is intended to provide temporary support to returnees and prepare their admission to HELIOS+. The chapter examines the basic structure of the programme, its participation criteria, its reach to date and the services provided.

Capacity Framework

The HELIOS+ project is intended to support a maximum of 4,323 participants with language acquisition, integration, access to employment and rent subsidies. Eligible persons have been able to register in the programme since 26 May 2025.¹⁰⁰ Persons who have been granted international or temporary protection within the last 24 months and who are registered as unemployed at the time of registration are eligible to participate.¹⁰¹

According to official statistics from the Ministry of Migration and Asylum, since the beginning of 2024 a total of 71,248 persons have been granted refugee status or subsidiary protection in Greece¹⁰² and therefore were, or remain, in principle eligible to apply for HELIOS+. This number exceeds the maximum capacity of the HELIOS+ project many times over. This figure does not even include those beneficiaries of international protection who were recognised since June 2023 and were therefore also still eligible to apply at the beginning of the project period. In addition, around 30% of current project participants are persons with temporary protection status. According to the available data, only 1,571 beneficiaries of international protection have so far been able to register under HELIOS+.¹⁰³ This corresponds to only around 2% of the beneficiaries of international protection recognised since 2024.

The HELIOS+ project is therefore, already by design, not intended to actually reach more than a small proportion of beneficiaries of international protection who are potentially eligible to apply during its duration.

Regional and Temporal Availability

In addition, access to the HELIOS+ project is already significantly restricted or effectively no longer possible in large parts of Greece. HELIOS+ is divided into 13 regional subprojects.¹⁰⁴ The programme

¹⁰⁰ Ministry of National Economy and Finance, General Secretariat for NSRF, Programmes - Calls: HELIOS+ Integrated Actions for the Integration of Third-Country Nationals into the Labour Market, Greek-language website, <https://www.espa.gr/el/Pages/ProclamationsFS.aspx?item=6855>, accessed 17 April 2026.

¹⁰¹ IOM, HELIOS+ Project Regulations Handbook, p. 3, <https://greece.iom.int/sites/g/files/tmzbd11086/files/englishhandbook.pdf>, accessed 24 March 2026.

¹⁰² Ministry of Migration and Asylum, February 2026 - International Protection Appendix A, p. 12, Tables 9a and 9b, author's own calculation based on the decisions granting protection listed there, https://migration.gov.gr/wp-content/uploads/2026/03/Report_A_February-2026_International-Protection_Appendix-A_NEW.pdf, accessed 24 March 2026.

¹⁰³ IOM, HELIOS+ Factsheet, 28 February 2026, p. 1, according to which 69.56% of the 2,258 persons registered under HELIOS+ are beneficiaries of international protection.

¹⁰⁴ IOM, HELIOS+: Comprehensive Actions for the Integration of Third Country Nationals in the Labour Market, <https://greece.iom.int/helios>, accessed 24 March 2026.

was not implemented in the region of Epirus, including its main city, Ioannina. In eight of the 13 regions, the project period already ends between June and August 2026. This includes Central Macedonia, where the metropolitan area of Thessaloniki is located. In Eastern Macedonia and Thrace and in Western Greece, the project expires in October and December 2026 respectively. At the time of publication of this report, the author had no information on any extension of individual regional subprojects.

Since both registration¹⁰⁵ and the submission of the required documents for the rent subsidy¹⁰⁶ must take place no later than six months before the end of the project, participation in these regions is in some cases already no longer possible and, in the remaining cases, will no longer be possible in the near future.

Only in the regions of Attica and Crete is the project scheduled to run until mid-2027. There, registration and applications for rent subsidies remain possible until the end of 2026.

This does not change the fact, however, that HELIOS+ is not a nationwide support mechanism overall. Rather, access depends heavily on the respective region and timing and is already unavailable in large parts of the country or will soon become unavailable.

Barriers to Registration

Apart from the limited time frame and the small number of available places, there are significant structural access barriers to registration in the HELIOS+ project.

A central requirement for participation is proof that protection status was granted within the last 24 months. For many returnees, this period is likely to have already largely elapsed or expired, especially where a longer period has passed between the granting of protection in Greece, onward movement, the asylum procedure in another Member State and return. In any event, this access requirement is likely already to exclude many returnees from receiving support under HELIOS+.

In addition, the granting of international protection must be proven and official proof of unemployment must be available. According to information provided by HELIOS+ to Meraki, registration for beneficiaries of international protection requires the following documents: the residence permit, the decision granting international protection, proof of service of the decision, Taxisnet login credentials and an unemployment card.

Obtaining the necessary documents may be associated with significant difficulties depending on the individual case, especially where documents are not available or are no longer available. According to the available findings, the likelihood of such difficulties is significantly higher for returnees.

For example, obtaining Taxisnet login credentials generally requires an update of the identification document at the tax office, which is difficult to access. If the asylum decision and proof of its service are no longer available, their reissuance must be requested from the Asylum Service. Based on the author's experience, obtaining an appointment with Asylum Offices or communicating with them by email can involve significant problems and delays.

The issuance of the unemployment card requires either DYPA login credentials that were already issued in the past, or Taxisnet login credentials and an AMKA. In addition, the unemployment card can only be applied for through a Greek-language website that is difficult to navigate without a good understanding of administrative procedures. Further information on access to documents, in particular Taxisnet login credentials and the unemployment card, can be found in Chapter 1.

¹⁰⁵ IOM, HELIOS+ Project Regulations Handbook, p. 3.

¹⁰⁶ Ibid., p. 11.

Meraki reports that affected persons often wait many months for contact or feedback from HELIOS+ and are frequently referred to obtaining their documents themselves. In the organisation's experience, registration is therefore not pursued further by many interested persons because obtaining the required documents without sufficient support is too complex and, in practice, extremely difficult to manage.

According to information provided by HELIOS+ to Meraki, HELIOS+ only supports the acquisition or issuance of documents after successful registration. This creates a structural access barrier: the requirements necessary for registration are almost impossible to meet without support, while that support only becomes accessible after registration has been completed.

Meraki, AFW, Mazi and ISS also report that HELIOS+ is difficult to reach, with inquiries remaining unanswered or information on access requirements only being provided after repeated follow-up and with considerable delay. RSA further states that, even after the documents have been submitted, there are long waiting times because HELIOS+ must verify the proof of unemployment with the competent authority. These reported communication problems and delays are particularly concerning because beneficiaries of international protection and returnees have only a limited period available for registration and for applying for rent subsidies.

In summary, for returnees in particular, there is a risk that access to HELIOS+ is not merely made more difficult, but effectively prevented, because time limits, demanding documentation requirements and lack of support in the registration process interact.

Services Provided by HELIOS+

After successful registration, participants generally gain access to various support services, including integration counselling, career counselling and language courses.

According to the HELIOS+ factsheets, however, language courses, which constitute a central prerequisite for access to vocational training measures, have only been offered since January 2026.¹⁰⁷ By February 2026, only 19 courses with a total of 288 participants had been held.¹⁰⁸ In view of the total number of registered participants, this suggests that language courses have so far been accessible only to a limited proportion of registered participants. This is particularly problematic because participants themselves identify language skills as a central obstacle to labour market integration, access to the healthcare system and everyday communication with the local community.¹⁰⁹

By contrast, the majority of services documented in the factsheets concern integration and career counselling.¹¹⁰ These measures are reported for a substantial proportion of registered participants. However, within the scope of this research, no reliable statements can be made about the concrete content or the actual effectiveness of these counselling services. Against this background, on the basis of the available information, it cannot be clearly answered to what extent HELIOS+ can actually support beneficiaries of international protection in obtaining employment, provided that they gain access to the programme.

¹⁰⁷ No language courses are listed in the factsheet of December 2025. Corresponding statistics appear for the first time in the factsheet of January 2026: IOM, HELIOS+ Factsheet, 31 December 2025, https://greece.iom.int/sites/g/files/tmzbdl1086/files/helios-general-factsheet-december-2025_english.pdf, accessed 24 March 2026; IOM, HELIOS+ Factsheet, 31 January 2026, https://greece.iom.int/sites/g/files/tmzbdl1086/files/helios-general-factsheet-january-2026_english.pdf, accessed 24 March 2026.

¹⁰⁸ IOM, HELIOS+ Factsheet, 28 February 2026, p. 2.

¹⁰⁹ Ibid., p. 4.

¹¹⁰ Ibid., p. 2.

Rent Subsidies

An application for rent subsidies must be submitted within 24 months of the granting of protection status and no later than six months before the end of the project. It follows that applications can already no longer be submitted in most regions of Greece because of the approaching end of the project, or will be excluded by June 2026 at the latest. An exception applies only to Attica and Crete.

A further requirement for the application is a bank account with a Greek bank and a signed rental contract officially registered in the system of the Greek tax authority. In addition to the necessary formal requirements, this presupposes that a landlord can first be found who is willing to rent to beneficiaries of international protection in the first place. According to the available findings, this can be associated with considerable difficulties (see Chapter 3). The prospect of rent subsidies may partially mitigate these barriers, but does not remove them.

The central problem is that beneficiaries of international protection must make substantial upfront payments before they can even apply for rent subsidies. Payment of the first instalment is linked, among other things, to the submission of the official registration of the rental contract. At that point, however, the first month's rent and a deposit usually already have to be paid, as landlords are generally otherwise unwilling to conclude a rental contract. Estate agent fees may also be added.

Overall, this regularly creates costs amounting to two to three months' rent, which must initially be borne by the persons concerned themselves. Meraki, RSA, LWB, AFW and NAOMI all describe that these upfront payments constitute a major barrier for many beneficiaries of international protection, who often do not have sufficient savings, and in many cases effectively prevent access to HELIOS+. The case of Interviewee 6 also illustrates this problem: she and her sister were unable to raise the required upfront payments of around EUR 1,200 in order to rent an apartment and thereby meet the requirements for rent subsidies.

This assessment is also supported by the statistics published by HELIOS+. These show that 70.6% of persons with temporary protection registered under HELIOS+ receive rent subsidies, whereas this applies to only 41.3% of beneficiaries of international protection registered under HELIOS+.¹¹¹ These figures show not only that beneficiaries of international protection receive rent subsidies significantly less often than persons with temporary protection registered under HELIOS+. They also indicate that even among beneficiaries of international protection who are already registered, HELIOS+ provides access to its central form of support, rent subsidies, only to a limited extent.

In addition, in October 2025 the Minister of Migration and Asylum announced that, as part of a restructuring of the system, the funds previously earmarked for rent subsidies would in future be redirected entirely to employment and language programmes.¹¹² These announcements further call into question the future availability and reliability of rent subsidies under HELIOS+.

¹¹¹ IOM, HELIOS+ Factsheet, 28 February 2026, author's own calculation based on the total number of registered persons stated in the factsheet, the share of beneficiaries of temporary protection and the number of persons receiving rent subsidies.

p. 1: 2,258 persons registered under HELIOS+, of whom 30.44% (687 persons) have temporary protection and 69.56% (1,571 persons) have international protection status; p. 2: 1,134 persons receive rent subsidies, of whom 42.76% (485 persons) have temporary protection and 57.24% (649 persons) have international protection status. On this basis, the author calculates that 485 of 687 registered persons with temporary protection, or 70.6%, received rent subsidies, compared with 649 of 1,571 registered beneficiaries of international protection, or 41.3%.

¹¹² Ministry of Migration and Asylum, Signing of an Agreement Between the Ministry of Migration and the Superfund: Reduction of Expenditure and Drastic Limitation of Benefits, Greek-language press release of 6 October 2025,

<https://migration.gov.gr/ypografi-symfonias-ypoyrgeioy-metanasteysis-me-ypertameio-meiosi-dapanon-kai-drastikos-periorismos-epidomaton/>, accessed 25 March 2026.

Case Examples

The organisations interviewed are aware of only a very limited number of cases in which beneficiaries of international protection succeeded in registering with HELIOS+ or receiving rent subsidies. None of the persons supported by RSA or Mazi received rent subsidies. ISS and LWB are not aware of any cases in which beneficiaries of international protection received support from HELIOS+. This is also supported by the data provided by Mobile Info Team: for 2025, the data do not document any case in which a beneficiary of international protection was able to successfully register with HELIOS+, although the organisation provided information on HELIOS+ through its helplines in 213 cases. NAOMI supported four cases with registration in 2025, one of which was successful. Meraki is aware of two cases in which families were able to register with HELIOS+. Of the 64 returnee cases supported by Meraki in 2025, registration with HELIOS+ was achieved in only one case. No further cases in which returnees were able to register with HELIOS+ became known in the course of this research.

Bridging Programme for Returnees from Germany

The bridging programme is a support programme for beneficiaries of international protection recognised in Greece who return from Germany to Greece. It provides participants with accommodation, food and social counselling, as well as support in obtaining the necessary documents in order to prepare for admission to HELIOS+. The programme is implemented by the International Organization for Migration (IOM) and funded by the European Commission.¹¹³ The total funding amounts to EUR 5 million.¹¹⁴

It is noteworthy that none of the actors involved in the programme, in particular IOM, the Greek Ministry of Migration and Asylum, the European Commission, the German Federal Office for Migration and Refugees (BAMF) or the German Federal Ministry of the Interior, has published a central public programme page with basic information on duration, funding, participation criteria or services. Publicly available information on the bridging programme therefore derives mainly from parliamentary questions, media reports and NGO reports.

A response by the BAMF to a request submitted by the author under the Freedom of Information Act (IFG) shows that implementation of the bridging programme is based on a contract concluded between the European Commission and Greece in April 2025. A document setting out the structure and operational processes of the bridging programme had not yet been finalised at the time of the IFG request at the end of March 2026, almost 14 months after the start of the programme. At that time, it was not foreseeable when a final version would be available.¹¹⁵ The BAMF cited “complex coordination processes” between IOM, the Greek Ministry of Migration and Asylum, the European Commission, the German Federal Ministry of the Interior and the BAMF as the reason for the delay.¹¹⁶

According to the BAMF, the bridging programme has been implemented since 1 February 2025 and has a duration of 18 months.¹¹⁷ At the time of its response, the BAMF had no information on a possible extension of the programme by the European Commission and Greece or on an independent continuation by Greece. At the same time, the BAMF stated that eligible persons can continue to be admitted to the bridging programme until further notice.¹¹⁸

¹¹³ European Commission, Communication from the Commission to the Council and the European Parliament on the status of migration management in mainland Greece, COM(2025) 170 final, p. 13, <https://data.consilium.europa.eu/doc/document/ST-7821-2025-INIT/en/pdf>, accessed 25 May 2026.

¹¹⁴ German Bundestag, Bundestag Printed Paper 21/2339, German-language answer to a parliamentary question, p. 9, <https://dserver.bundestag.de/btd/21/023/2102339.pdf>, accessed 25 May 2026.

¹¹⁵ IFG request, Bridging Programme for Returnees to Greece, 11 February 2026 (IFG-1421), response by email of 27 March 2026. The full response of the BAMF to the IFG request is available in the German original and in English translation in Annex 5.

¹¹⁶ IFG-1421, response by email of 13 April 2026.

¹¹⁷ IFG-1421, response by email of 27 March 2026.

¹¹⁸ IFG-1421, response by email of 13 April 2026.

Participation Criteria and Reach of the Programme

According to a response by the German Federal Government, a person who has been granted protection status in Greece, whose protection was granted in Greece no more than 20 months previously, and who returns voluntarily to Greece is in principle eligible to participate in the bridging programme.¹¹⁹

The criterion that the granting of protection in Greece must not date back more than 20 months substantially restricts the group of potentially eligible persons. In 2025, the average duration of the asylum procedure in Germany for beneficiaries of international protection recognised in Greece was 14.9 months.¹²⁰ In addition, according to the author's experience, beneficiaries of international protection in Greece regularly have to wait between one and three months after recognition for their residence permit and travel documents. If delays before leaving Greece, lodging an asylum application in Germany, and possible court proceedings against a negative decision are also taken into account, the 20-month criterion is likely to be difficult for many affected persons to meet in practice.

This exclusion criterion is likely to contribute substantially to the limited reach of the programme. However, there are also further practical factors that may make participation more difficult. These include the absence of a public programme page, the limited publicly available information on access requirements and procedures, and uncertainties regarding actual admission to the programme. It must also be taken into account that a return to Greece is not a neutral option for many affected persons. Many beneficiaries of international protection left Greece because of lack of accommodation, inability to secure their livelihood, difficult working conditions or other precarious living circumstances. Against this background, the willingness to return voluntarily to these conditions is likely to be limited, even where temporary support is offered.

This is also reflected in the figures published by the Federal Government. By 6 October 2025, a total of 4,132 persons had received a letter since January 2025 concerning the possibility of returning to Greece with support from the bridging programme. In fact, however, only 16 persons had returned to Greece through the bridging programme by that date.¹²¹ The additional information provided by the BAMF also confirms the programme's continued limited reach in practice. According to information from the BAMF, by 26 March 2026 a total of 54 persons had been admitted to the bridging programme and had either received the support provided or were still participating in the programme at that time.¹²²

Services

According to the German Federal Government, the bridging project includes the following services:

- Pick-up at the airport after re-entry into Greece and transport to temporary accommodation.
- Accommodation in temporary accommodation for a maximum of four months, with full board and provision of items for daily needs.
- Social counselling, including assessment of medical support needs, and preparation for admission to the Greek integration programme HELIOS+.
- Financial support: entitlement to cash assistance for up to two months after arrival in Greece (per month EUR 75 for one person, EUR 135 for two persons, EUR 160 for three persons and

¹¹⁹ German Bundestag, Bundestag Printed Paper 21/2341, German-language answer to a parliamentary question, p. 7, <https://dserver.bundestag.de/btd/21/023/2102341.pdf>, accessed 25 May 2026.

¹²⁰ German Bundestag, Bundestag Printed Paper 21/4911, German-language answer to a parliamentary question, p. 13, <https://dserver.bundestag.de/btd/21/049/2104911.pdf>, accessed 25 May 2026.

¹²¹ German Bundestag, Bundestag Printed Paper 21/2339, German-language answer to a parliamentary question, p. 6, <https://dserver.bundestag.de/btd/21/023/2102339.pdf>, accessed 25 May 2026.

¹²² IFG-1421, response by email of 27 March 2026.

EUR 210 for four or more persons; if no food is provided at the place of accommodation, the amounts are doubled).¹²³

According to the German Federal Government, all persons who had left for Greece under the programme by October 2025 were accommodated in the “Serres communal accommodation facility”.¹²⁴ This is not a separate integration accommodation facility, but an existing facility of the Greek reception system for asylum seekers, namely a camp.

The available reports on Serres do not specifically concern participants in the bridging programme, but are relevant for assessing the accommodation provided in that facility. A report by Mobile Info Team and Refugee Legal Support describes the conditions in Greek mainland camps overall as marked by serious deficiencies in accommodation, provision and access to services,¹²⁵ and also refers to continuing problems in the Serres camp.¹²⁶ The Greek Ombudsman also documented significant shortcomings in Serres. These concerned in particular medical care, shortages of medication and the conditions in areas for particularly vulnerable persons. According to the Ombudsman’s findings, there were doubts as to whether the areas provided for vulnerable persons were in fact suitable, including in view of the lack of heating in communal spaces.¹²⁷

The financial support to be paid under the bridging programme corresponds to the amounts that asylum seekers receive under the cash assistance programme.¹²⁸ However, cash assistance for asylum seekers has not been paid for more than one year.¹²⁹ Whether cash assistance for participants in the bridging programme is actually paid regularly could not be established within the scope of this report.

A document of the European Commission also shows that participants in the bridging programme are to receive support in obtaining the necessary documents in order to enable registration with HELIOS+.¹³⁰ According to the information available to the BAMF, participants in the bridging programme are generally admitted to HELIOS+, provided that the person concerned wishes this.¹³¹

This raises questions of equal treatment and transparency. Beneficiaries of international protection who do not participate in the bridging programme receive neither this structured transition into HELIOS+ nor the additional support in obtaining the documents required for it. It is not apparent why this support is available only to participants in the bridging programme and not also to other beneficiaries of international protection who are eligible for HELIOS+ and would need comparable support in overcoming access barriers.

¹²³ German Bundestag, Bundestag Printed Paper 21/2341, p. 7.

¹²⁴ German Bundestag, Bundestag Printed Paper 21/2339, p. 8.

¹²⁵ Mobile Info Team, Refugee Legal Support, *Voices from the Camps: Living Conditions and Access to Services in Refugee Camps on the Greek Mainland*, pp. 6–8, <https://www.mobileinfoteam.org/voices-from-the-camps>, accessed 25 May 2026.

¹²⁶ *Ibid.*, p. 22.

¹²⁷ The Greek Ombudsman, *The Challenge of Migratory Flows and Refugee Protection: Reception Conditions and Procedures*, 2024, pp. 33, 63, 67 and 75, https://www.refworld.org/themes/custom/unhcr_rw/pdf-js/viewer.html?file=https%3A%2F%2Fwww.refworld.org%2Fsites%2Fdefault%2Ffiles%2F2024-04%2F030424-ekthesi-prosfyges-metanastes.pdf, accessed 25 May 2026.

¹²⁸ Ministerial Decision 115202/2021, *Conditions for the Provision of Material Reception Conditions in the Form of Financial Assistance to Applicants for International Protection*, ΦΕΚ Β 3322/26.07.2021, Art. 3, <https://search.et.gr/el/fek/?fekId=587852>, accessed 25 May 2026.

¹²⁹ Mobile Info Team, *Provision of cash assistance to asylum seekers in Greece must resume immediately*, joint statement of 26 February 2026, <https://www.mobileinfoteam.org/joint-statement-cash-assistance-lack-2026>, accessed 25 May 2026.

¹³⁰ European Commission, *On the Status of Migration Management in Mainland Greece*, p. 13.

¹³¹ IFG-1421, response by email of 13 April 2026.

Conclusion

In summary, access to the HELIOS+ programme for beneficiaries of international protection is associated with significant structural and practical barriers and is, in practice, almost impossible for returnees.

The limited capacity of the programme already falls far short of the potential need, meaning that only a very small proportion of beneficiaries of international protection in Greece can actually be reached. In addition, there are considerable access barriers in the registration procedure. The requirements, especially the limitation to a period of 24 months after being granted status and the required proof relating to unemployment and protection status, are regularly impossible for returnees to meet. Access to the programme is therefore already substantially restricted at the first stage.

Even after successful registration, further structural obstacles remain. In particular, rent subsidies, which constitute a central component of the programme, require substantial upfront payments. The need to pay several months' rent in advance constitutes a practical access barrier for many beneficiaries of international protection who lack sufficient financial resources.

Overall, this means that HELIOS+ is neither accessible nationwide nor practically suitable to provide a large proportion of beneficiaries of international protection, and returnees in particular, with effective access to central integration services.

Nor does the bridging programme for returnees from Germany establish a generally viable support perspective. It is not sufficiently transparent to the public, has so far reached only a small number of persons, and is restricted to a narrow group by the 20-month criterion. The programme can therefore at most provide temporary support for a small group, but cannot compensate for the structural access barriers faced by returnees overall.

Chapter 16: The Programme “Housing and Work for the Homeless”

Introduction

The programme “Housing and Work for the Homeless” supports homeless persons in finding housing and employment. The following sets out the legal basis of the programme, its access requirements, and the available indications regarding its accessibility in practice for beneficiaries of international protection.

Since only very limited practical information on the programme could be obtained from the organisations and returnees interviewed, this chapter is based predominantly on publicly available information and information provided by OPEKA. The focus is therefore on the legal and structural framework of the programme.

Time Frame and Legal Basis

According to the housing policy portal of the Ministry of Social Cohesion and Family, the programme “Housing and Work for the Homeless” is in its third phase, which runs from spring 2025 to December 2028. It provides rent subsidies and support to cover basic needs, psychosocial support and referral to services, as well as support for employment and vocational training for homeless persons in Greece.¹³²

According to the ministerial decision regulating the details of the programme, the eligible participant groups include persons accommodated in homeless shelters, persons recorded as homeless by municipal social services who live on the street or in precarious housing conditions, and women accommodated in shelters for victims of violence who have no access to housing. In addition, it includes persons accommodated in recognised treatment programmes for persons with addiction problems who have no access to housing. The decision also refers to persons who have been provided with housing free of charge by a body of the General Government.¹³³ However, this last participant group is not relevant for the present context.

The ministerial decision also regulates the minimum documentation that must be submitted for admission to the programme.¹³⁴ In particular, proof is required that the person concerned belongs to one of the programme’s participant groups, for example proof that they live in a homeless shelter or a women’s shelter or have been recorded as homeless by the municipal social services; a social report; and an assessment report by the competent social service justifying the possibility of admission to the programme. In addition, an income tax return and the tax clearance certificate for the most recent relevant tax year are required, as well as a current declaration of assets and an identity card or residence permit of the participant. In cases of shared accommodation, medical certificates are also required showing that there is neither a dermatological or airborne disease nor a serious mental or neurological disorder that would make communal living impossible.

¹³² Ministry of Social Cohesion and Family, Housing and Work for the Homeless III, Greek-language website, <https://stegasi.gov.gr/programs/stegasi-kai-ergasia-gia-astegous-iii/>, accessed 16 March 2026.

¹³³ Joint Ministerial Decision 1301/2024, Determination of the Conditions for the Implementation of the Programme Entitled “Housing and Work for the Homeless”, ΦΕΚ Β 4766/20.08.2024, Art. 3, <https://www.taxheaven.gr/circulars/47874/1301-2024>, accessed 18 April 2026.

¹³⁴ *Ibid.*, Art. 4.

Capacity of the Programme

According to information from OPEKA,¹³⁵ approvals for participation in the current programme cycle have already been granted. At the time the information was provided, 1,604 persons had been approved.¹³⁶ Only if a participant leaves the programme can persons from existing waiting lists take their place.¹³⁷ It follows that, in its current phase, the programme is not generally accessible to new applicants.

OPEKA further states that a new cycle is to be opened for the coming two-year period. At the time the information was provided, however, neither the budget available for this purpose nor the number of participants to be supported in future had been determined. It is therefore currently not foreseeable when and to what extent new admissions will actually be possible.¹³⁸ For beneficiaries of international protection and returnees, this means that, at least until a new cycle is opened, there is no practical possibility of access to the programme.

Narrowly Defined Participant Group

Irrespective of this, it is apparent that the programme's eligibility criteria are defined so narrowly that, even if places were theoretically available, it would not offer most beneficiaries of international protection any realistic prospect of access.

Access to homeless shelters is almost impossible for beneficiaries of international protection, due to the absence of available places and access barriers such as the need to speak Greek or English and the requirement to provide medical certificates. This requirement is regularly impossible to meet because of practical and formal barriers in the healthcare system. More information on this issue can be found in Chapter 5.

There are also serious doubts as to whether it is actually possible to be recorded as homeless by the municipal social services. In a letter to the President of the Central Union of Municipalities of Greece (KEDE), the Association of Social Workers of Greece describes conditions in the municipal social services that are, in some respects, dramatic. In addition to extreme understaffing, with one social worker for 40,000 residents and one social worker for 400 or more persons receiving social support,

¹³⁵ The programme is not implemented directly by OPEKA, but by the respective participating implementing bodies. Nevertheless, OPEKA plays a central role in the administration of the programme. This is shown by the fact that the relevant Joint Ministerial Decision 1301/2024 refers, in recital 3, to an OPEKA budgetary commitment decision for the programme. In addition, the call for the current programme phase is published through OPEKA and OPEKA is named there as the contact point for information: OPEKA, Call for the Submission of Funding Applications for the Programme "Housing and Work for the Homeless III", <https://opeka.gr/prosklisi-ypovolis-aitiseon-chrimatodotisis-gia-to-programma-stegasi-kai-ergasia-gia-toys-astegoy-s-jiii/>, accessed 21 April 2026.

¹³⁶ Email from OPEKA to the author of 3 April 2026. This response and two further responses from OPEKA are reproduced in the Greek original and in English translation in Annex 6.

¹³⁷ Email from OPEKA to the author of 25 May 2026.

¹³⁸ In an email of 26 May 2026, OPEKA stated that the call for applications by participating implementing bodies was expected to be published at the beginning of autumn. OPEKA described these bodies as entities that may submit funding applications for the implementation of plans. This corresponds to the structure of the previous two-year cycle, in which a call for funding applications was first published for eligible bodies. Experience from the previous two-year cycle shows that several months may pass between such a call and the approval of funding applications.

The call for funding applications for the previous cycle was published in August 2024. Approvals for individual plans were granted in February 2025 (e.g. Municipality of North Corfu, Announcement: Invitation for Expressions of Interest and Applications for the Programme "Housing and Work for the Homeless III", announcement of 6 March 2025, referring to a decision of 21 February 2025, <https://www.mncnorthcorfu.gr/avakoivwsh-προσκληση-ενδιαφεροντο/>). Publicly available information from individual implementing bodies also shows that, even after funding had been approved, further weeks or months could pass before calls for applications for new participants were published (e.g. Municipality of Lamia, Invitation to Homeless Persons / Persons Affected by Precarious Housing to Participate in the "Housing and Work for the Homeless III" Programme of 14 May 2025, <https://www.lamia.gr/roi-eidiseon-prosklisi-ofeloymenon-astegonepifaloy-s-stegasis-gia-symmetohi-sto-programm-a-stegasi>). It is also unclear how many new participants can be admitted in the coming two-year cycle.

the letter describes severe overburdening with responsibilities and tasks that are continuously transferred to the social services by other ministries. According to the letter, under these conditions “the provision of basic social welfare services is impossible, particularly to members of the diverse categories of vulnerable social groups such as migrants, homeless persons, persons with mental illness, long-term unemployed persons, elderly persons, persons living on income below the poverty line, etc.”¹³⁹

A press release by the Association of Social Workers of Greece of 31 March 2026 shows that these problems continue to persist. It draws attention to “the dramatic psychosocial effects” of the understaffing of the social services “on members of the multiple categories of vulnerable social groups in the country’s population.”¹⁴⁰

Under these conditions, it is difficult to imagine that homeless beneficiaries of international protection and returnees would have a realistic prospect of being recorded as homeless by the municipal social services, which would be necessary for them even to fall within the relevant participant group.

This report cannot assess whether women who have been victims of domestic or sexual violence and live in women’s shelters, or persons with addiction problems in treatment programmes, can fall within the programme’s participant group. However, even if a real possibility of access existed, this would concern only two specific and limited target groups and would not remove the structural barriers for the majority of beneficiaries of international protection.

Barriers to Providing the Required Documentation

Even if a beneficiary of international protection in principle falls within the group of participants, this alone does not make actual access to the programme possible, as further documents must be submitted in order to be admitted, and obtaining them is associated with significant practical barriers.

Admission to the programme is made particularly difficult by the need to submit a current tax clearance certificate and a current declaration of assets. Obtaining both documents requires an AFM and Taxisnet login credentials, since according to the available findings, a tax return and a declaration of assets can only be submitted online through the Taxisnet portal. Especially for beneficiaries of international protection who are homeless or living in precarious housing situations, access to the internet or to Taxisnet login credentials may already pose practical difficulties. Another significant barrier is likely to be the preparation of the tax and asset declarations, since this is highly unlikely to be possible without external expert assistance, due to the Greek tax system, which is generally considered complex, and because of language barriers.

The difficulties returnees face in presenting a valid residence permit have already been addressed several times in this report. The same applies to lost documents such as the AFM and Taxisnet login credentials, which are particularly likely to be missing in the case of returnees. For further details on the difficulties in obtaining an AFM, Taxisnet codes and a tax clearance certificate, reference is made to Chapter 1.

¹³⁹ Association of Social Workers of Greece, Request for Action by KEDE Regarding the Continuing Transfer of Social Welfare Responsibilities to Municipalities, Greek-language letter of 3 June 2024, p. 9, https://www.skle.gr/img/enimerosi_files/1349_362024_vpomnimakede.pdf, accessed 19 April 2026.

¹⁴⁰ Association of Social Workers of Greece, World Social Work Day / Protest Rally at the Prime Minister’s Office and Meeting with the Minister of State, Greek-language press release of 31 March 2026, <https://www.skle.gr/skle-news-2422.htm>, accessed 19 April 2026.

Beneficiaries of International Protection in the Programme and Case Examples

According to information from OPEKA, 55 beneficiaries of international protection and 4 asylum seekers are participants in the current programme cycle.¹⁴¹ The findings presented in Chapter 8 suggest that the need significantly exceeds this number. This supports the assessment that, in practice, the programme reaches beneficiaries of international protection only to a limited extent.

The very limited practical information that the organisations interviewed were able to provide, compared with other topics, is a further indication that the programme is difficult for beneficiaries of international protection to access in practice and is therefore of limited relevance to this group.

Some of the organisations interviewed were not aware of the programme's existence. RSA was not able to place any of the cases supported by the organisation in the programme. One social worker interviewed had, in a previous position supporting other, non-migrant target groups, tried to place persons in the programme. However, this did not succeed in a single case. Only Meraki was aware of a few individual cases of women with experiences of violence who were admitted to the programme. The author of this report is also not aware of any case from his many years of work in Greece in which beneficiaries of international protection or asylum seekers obtained access to the programme "Housing and Work for the Homeless".

Conclusion

In the current programme cycle, the programme "Housing and Work for the Homeless" is not available either to homeless beneficiaries of international protection or to other homeless persons, as approvals for participants have already been granted. Moreover, even if places were theoretically available, there are serious doubts as to whether beneficiaries of international protection could actually receive support through the programme. The participant group is defined in such a way that it excludes a large proportion of beneficiaries of international protection.

In addition, the documents required for admission to the programme are difficult to obtain for beneficiaries of international protection who are homeless or living in precarious housing situations. This applies in particular to returnees. The small number of 55 beneficiaries of international protection in the current programme cycle, as well as the few individual cases identified in the course of this research, support the assessment that, in practice, the programme reaches beneficiaries of international protection only to a limited extent.

¹⁴¹ Email from OPEKA to the author of 25 May 2026. The full email in the original and in English translation can be found in Annex 6.

Section VI: Gender-Based Risks

Chapter 17: Sexualised Violence and Exploitation

Introduction

This chapter examines the risk of sexualised violence and exploitation for women who are beneficiaries of international protection and for female returnees. It covers, in particular, sexual harassment, sexual assaults, rape, demands for sexual favours, and the exploitation of dependency relationships.

The chapter first presents cases of sexualised violence and exploitation in connection with accommodation and work situations. Findings on frequency, reporting rates and available support for those affected are then brought together. The final sections identify risk factors and set out situations associated with particular vulnerability.

Unofficial Hostels

The organisations interviewed assess unofficial hostels as extremely unsafe for women. Where women have access to such accommodation at all, sleeping rooms usually cannot be locked, meaning that male co-residents can, in principle, access them.

Cribs reports that around half of the accommodation requests from women concern cases in which a place to sleep already exists, but the current accommodation, such as an unofficial hostel, is perceived as fundamentally unsafe. Cribs recently became aware of the case of a single woman who was accommodated with a total of 15 persons, predominantly men. Out of fear of possible assaults, she was unable to sleep at night.

Sanitary facilities, too, are sometimes not lockable. In a case reported by AFW, the mother of an underage daughter had to stand guard outside the door while her daughter used the shower or toilet in order to protect her from possible assaults by male residents in the accommodation.

The structural conditions described create a significant risk. This arises in particular from the combination of lack of privacy, lack of security in the premises, and the living circumstances of many residents. Cribs points out that many men in these forms of accommodation live in highly unstable and stressful situations. According to Cribs, uncertain future prospects, psychological distress and trauma, combined with alcohol or drug use among male residents, may in individual situations lead to additional disinhibition and unpredictability and further increase the potential danger.

Considerable risks may also arise in individual cases during the search for accommodation. LWB reported, for example, the case of a Syrian beneficiary of international protection who was raped during an apartment viewing.

Homelessness

According to reports by several organisations, a particularly high risk exists in situations of homelessness. AFW, LWB and Cribs point out that homeless female beneficiaries of international protection are particularly vulnerable due to the absence of protection and safe spaces to which they can withdraw.

In this context, Cribs describes sexual harassment as widespread. In addition, both Cribs and AFW report numerous cases of sexualised violence, including rapes in public spaces, for example in parks or on the street. In individual cases, such assaults resulted in pregnancies.

The particular exposure of homeless beneficiaries of international protection and the concrete fear of gender-based violence are also illustrated by an individual case described by LWB. LWB reported the case of a homeless single father who cut the hair of his four-year-old daughter so that she would not be perceived as a girl.

In addition, Choosehumanity and Cribs report cases in which beneficiaries of international protection were pushed into so-called survival prostitution as a result of homelessness. The lack of safe alternatives can force affected women to take considerable risks in order to secure their basic needs or end their homelessness, making them particularly vulnerable to sexual exploitation and other forms of exploitation.

Informal Accommodation with Private Individuals

Informal accommodation with private individuals, often through acquaintances, casual contacts or contacts from the same community, constitutes another high-risk context. It typically arises when beneficiaries of international protection lose their accommodation in a camp after recognition or have no access to accommodation after return. While this may avert homelessness in the short term, it can create significant risks of sexualised violence and exploitation.

Such constellations are often marked by a pronounced dependency relationship and a considerable power imbalance, as the women concerned rely on the accommodation to meet their basic need for shelter. Organisations such as AFW, Cribs and Meraki report numerous cases in which this dependency led to demands for sexual favours in exchange for accommodation. In a case shared by Cribs, a beneficiary of international protection stayed with a friend in order to escape imminent homelessness. After some time, however, she was pressured by the friend's partner, who made her continued stay in the accommodation dependent on her sexual availability. In other cases, rapes occurred in the context of such accommodation situations.

The particular risk situation is also illustrated by individual cases. One interviewee reported that she had to leave the camp after being granted protection status and became homeless. This forced her to find different places to sleep through a meeting point for people from her community. This was associated with substantial difficulties, was degrading, and she was not able to find a place to sleep every night. After several weeks, she met a man who offered to let her stay with him for a longer period. In his apartment, she was raped at knifepoint. The perpetrator deliberately exploited her precarious situation and claimed that the police would not believe her because she had come to him voluntarily. After the assault, she was expelled from the apartment at night. Her phone number was also passed on to other men, who subsequently contacted her and demanded sexual favours, causing further serious psychological distress. The interviewee stated that these experiences were a major reason why she later left Greece.

Organisations also report comparable cases. Cribs documented, for example, the case of a beneficiary of international protection who stayed with a person on the recommendation of relatives in order to avoid imminent homelessness. Only after some time did she realise that she had repeatedly been drugged and raped. These assaults resulted in a pregnancy. Out of fear of reprisals, she refrained from reporting the case.

In addition, Cribs is aware of at least four cases in which women were forced into sex work in connection with accommodation informally provided by private individuals in order to be able to pay for the accommodation.

Employment

In connection with the search for work and employment, several organisations report cases of sexualised violence, sexual exploitation and the exploitation of dependency relationships. Cribs points

out that sexual harassment of women is already widespread in the regular working world in Greece, but that the risk is considerably increased in informal and unregulated employment relationships.

Cribs is aware of numerous cases of sexual harassment, as well as cases of sexual exploitation and exploitation of dependency relationships affecting beneficiaries of international protection, both during the search for work and at the workplace itself. The perpetrators are often employers in the informal economy as well as informal job agencies operating on the margins of legality and placing people in unregulated employment relationships. Cribs reports, for example, the case of a woman who was offered a job by an informal job agency on condition that she had sex with the intermediary. Cribs sees a clear connection between the lack of regulation and oversight of such informal work arrangements and an increased risk of sexual harassment, sexual exploitation and exploitation of dependency relationships. The more informal the context, the greater the dependency and the greater the fear among those affected of taking action against sexual harassment, exploitation or assault.

This assessment is confirmed by other organisations. Meraki reports several cases in childcare and hospitality in which an employment contract or continued employment was made conditional on sexual favours. None of these cases was reported, which points to the high threshold for taking action against exploitation or assaults in such relationships of dependency.

AFW reports serious cases of violence in the context of informal work. Domestic work is particularly affected. Several organisations report sexual assaults in this context, including serious cases. AFW, for example, shared the case of a woman who cared for an elderly woman in her household and whom a relative of the person being cared for attempted to rape. ISS also reported the case of a beneficiary of international protection who worked as a domestic worker without a contract and experienced sexualised violence and exploitation in this context. She was later recognised as a victim of human trafficking.

The available reports show that relationships of dependency and power imbalances, particularly in the unregulated environment of the informal economy, considerably increase the risk of sexualised violence and exploitation.

Findings on Frequency and Scale

The reports of the organisations interviewed show a consistent pattern of recurring cases of sexualised violence and exploitation, particularly in the context of homelessness, dependency relationships in accommodation, and employment relationships in the informal economy.

Although there are no specific surveys on the extent of sexualised violence against beneficiaries of international protection in Greece, several data sources and reports exist that make it possible to contextualise the scale of the issue. These are presented below and provide a basis for drawing conclusions regarding the risk situation, as well as for cautiously assessing the extent of sexualised violence and exploitation against beneficiaries of international protection.

A study by ActionAid from November 2020 examined the frequency of sexual harassment and sexualised violence against women in the Greek workplace in general, and in particular in the tourism and hospitality sector. According to the study, 85% of surveyed women working in the tourism and hospitality sector stated that they had experienced at least one form of sexual harassment at work. In addition, 22% reported rape, attempted rape or sexual coercion. 27% reported sexual blackmail at work.¹⁴²

¹⁴² ActionAid, This Is Not Our Job, Greek-language report, 2020, p. 185, https://notpartofourjob.actionaid.gr/public/ActionAid_Harassment-Report.pdf, accessed 20 April 2026.

The study does not specifically concern beneficiaries of international protection, but women working in Greece more broadly. However, it concerns the tourism and hospitality sector, an area in which, according to the findings in Chapter 12, many female beneficiaries of international protection work. In addition, against the background of the increased vulnerability of beneficiaries of international protection described above, due to their frequent involvement in informal and poorly regulated employment relationships, it can be assumed that the actual extent of sexual harassment, sexualised violence and exploitation affecting beneficiaries of international protection is likely to be higher rather than lower than the level reflected in the study.

Further indications of the scale of gender-based violence in the Greek context can be derived from the annual reports of the organisation Diotima. In its annual reports for 2023 and 2024, it publishes figures on the persons affected by gender-based violence whom it supported. According to these figures, the organisation supported 1,135 affected persons in 2023¹⁴³ and 853 in 2024¹⁴⁴. These figures do not relate exclusively to beneficiaries of international protection, but also include other groups, including Greek nationals. Nevertheless, they provide insight into the scale of gender-based violence in the Greek context overall.

Diotima also expressly refers to the particular impact on women from third countries. In a 2023 report, it states: “Sexual harassment at work and/or in public spaces is spreading further, and particularly vulnerable groups such as women from third countries, women with disabilities, lesbian and bisexual women are much more frequently affected.”¹⁴⁵

In its sixth annual report on violence against women, the General Secretariat for Equality and Human Rights likewise emphasises that certain groups, including female beneficiaries of international protection, are affected by multiple discrimination and should receive targeted special attention within support structures.¹⁴⁶

In a press release of 30 May 2025 concerning the closure of its day care centre for beneficiaries of international protection, asylum seekers and migrants in Athens, Médecins Sans Frontières (MSF) states that over the course of nine years it supported a total of 1,289 survivors of sexual violence.¹⁴⁷ This figure relates to a specific support service and does not allow conclusions to be drawn about overall prevalence. It does, however, illustrate the significant need for support services for survivors of sexual violence in the context of displacement and migration in Greece.

Target-group-specific data from Cribs’ practice also provide further indications. A social worker from the organisation reported that, of 80 women accommodated, at least 25 were identified as survivors of sexual violence. In addition, data on referrals to Cribs over the past five years could be analysed in the course of this research. In 33 of 110 cases, indications of sexualised violence were already present at the time of referral or concrete indications of a substantially increased risk of sexualised violence were mentioned. Although these are not representative samples, these data constitute an important practice-based indication due to their direct connection to the target group. They underline

¹⁴³ Diotima Centre, Annual Report 2023, p. 5, <https://diotima.org.gr/wp-content/uploads/2024/05/Report-2023-Eng-3-1.pdf>, accessed 20 April 2026.

¹⁴⁴ Diotima Centre, Annual Report 2024, p. 5, https://diotima.org.gr/wp-content/uploads/2025/09/Report-2024_Eng-1.pdf, accessed 20 April 2026.

¹⁴⁵ Diotima Centre, Summary and Policy Recommendations for the Prevention of Gender-Based Violence 2023, Greek-language report, 2023, p. 7, author’s own translation, https://diotima.org.gr/wp-content/uploads/2024/01/GBV-PREVENTION-POLICY-BRIEF_2023_final.pdf, accessed 20 April 2026.

¹⁴⁶ Ministry of Social Cohesion and Family, General Secretariat for Equality and Human Rights, Sixth Annual Report on Violence Against Women, Greek-language report, 2026, p. 20, <https://isotita.gr/wp-content/uploads/2026/03/6n-etisia-ekthesi-gia-ti-via-kata-twn-gynaikwn.pdf>, accessed 3 April 2026.

¹⁴⁷ MSF, MSF closes day care centre in Athens after nine years of providing care, <https://www.msf.org/msf-closes-day-care-centre-athens-after-nine-years-providing-care>, accessed 3 April 2026.

that sexualised violence represents a relevant experience or concrete risk for a significant proportion of female beneficiaries of international protection.

The combination of large-scale support figures, target-group-specific case numbers, and several independent sources strongly indicates a structural risk.

Reporting Rates for Sexual Harassment and Sexualised Violence

In addition, official statistics provide insight into the officially recorded extent of such offences. According to available police data, a total of 458 cases of rape were recorded in Greece in 2025.¹⁴⁸ However, these data reflect only reported and registered cases and do not allow conclusions to be drawn about the actual extent.

The available data indicate that only a small proportion of sexual harassment, sexual assaults or sexualised violence is reported. The ActionAid study shows that the reporting rate is already low among the general female working population. For example, only 2% of the women surveyed in the tourism sector stated that they had reported incidents to the police, while 1% had contacted the Labour Inspectorate.¹⁴⁹

Against the background of additional structural barriers, the reporting rate among beneficiaries of international protection is likely to be even lower. These barriers include, in particular, language barriers, experiences of discrimination, and low trust in state institutions and the Greek police. This assessment is supported by reports from practice. LWB and Meraki both report that women affected by displacement report such cases only in exceptional cases.

Available Support

In mid-2025, two important support structures for survivors of sexual violence ceased their work.

On 30 May 2025, MSF ended the operation of its day care centre in Athens, where, in addition to medical and psychosocial support for a wider group of beneficiaries, survivors of sexual violence received specific support. In the accompanying press release,¹⁵⁰ against the background of ongoing challenges in the field of support and care, MSF appealed to state authorities and civil society to continue this work.

At the end of June 2025, the organisation Diotima also discontinued a programme funded by UNHCR that specifically targeted beneficiaries of international protection and asylum seekers who had become victims of sexual violence.¹⁵¹ The end of this programme occurred in a context in which UNHCR had to significantly reduce its activities in Greece due to funding difficulties. In an email of 24 March 2026, Diotima confirmed to the author that it currently does not implement any specific programmes to support beneficiaries of international protection who have become victims of sexual violence.

The discontinuation of these support services has led to a significant restriction of specialised support structures for survivors of sexualised violence. According to Meraki, following the closure of the Diotima programme, there has no longer been any specific support programme for beneficiaries of international protection in Greece who are affected by gender-based violence. Cribs also pointed out

¹⁴⁸ Hellenic Police, Statistical Yearbook 2025, Greek-language report, p. 15, <https://www.astynomia.gr/file/2026/02/epetirida2025.pdf>, accessed 20 April 2026.

¹⁴⁹ ActionAid, This Is Not Our Job, p. 195.

¹⁵⁰ MSF, MSF closes day care centre in Athens after nine years of providing care, <https://www.msf.org/msf-closes-day-care-centre-athens-after-nine-years-providing-care>.

¹⁵¹ Communication sent by Diotima to organisations active in Greece in early May 2025, announcing that the programme for beneficiaries of international protection and asylum-seeking survivors of sexual violence would end at the end of June 2025. On file with the author.

that, with the loss of Diotima and MSF, central contact points have ceased to exist, although in the organisation's assessment a substantial extent of sexualised violence must still be assumed. This suggests that affected beneficiaries of international protection have very limited access to adequate support, which greatly increases the risk that the consequences of sexualised violence will not be sufficiently addressed.

Risk Factors and Particularly Vulnerable Groups

The available information allows several conclusions to be drawn regarding factors that significantly increase the risk of sexualised violence and exploitation against beneficiaries of international protection. These are not isolated individual risks, but rather the interaction of interconnected risk situations and risk factors that overlap and reinforce one another.

According to the available findings, this dynamic regularly begins with situations of acute material hardship, as described several times in the course of this report. The inadequate integration and support system in Greece not only contributes to existing emergencies often not being effectively absorbed, but also to their emergence. These risk situations include, in particular, homelessness or the threat of homelessness, as well as the absence of a reliable source of income sufficient to secure a livelihood and realistic access to legal employment.

These emergencies give rise to concrete risk situations. These include, in particular, dependency on third parties for accommodation, for example when staying with private individuals, and for access to income, as well as a far-reaching lack of protection against pressure, exploitation and violence, for example in cases of homelessness or informal work arrangements.

These situations of dependency and lack of protection create a significantly increased risk of sexualised violence and exploitation. They can be exploited by third parties, for example through demands for sexual favours, sexual harassment, or exploitative relationships in the context of accommodation or work.

The acute nature of these emergencies regularly means that those affected, even when they recognise a situation as dangerous, cannot effectively avoid the associated risk because they often lack the necessary means and alternatives. Instead, situations frequently arise in which different risks must be weighed against one another. For example, the question may arise whether it is "safer" to accept an overnight stay offered by a man or to sleep on the street.

The following presents several groups that are at particularly high risk of entering such emergencies and, as a result, being exposed to sexualised violence and exploitation.

Single Women

Female beneficiaries of international protection without a partner or family ties in Greece are regularly exposed to an increased risk of entering situations of acute material hardship and, as a result, being exposed to exploitative relationships or sexual assaults.

Due to the absence of a trusted person, there is an increased risk of becoming dependent on third parties, particularly with regard to accommodation and securing a livelihood. In these areas, single women are more often dependent on informal solutions and are therefore more exposed to situations of pressure. In addition, immediate support is lacking in dangerous situations, which may cause such situations to escalate and make it more difficult to leave them.

Meraki confirms this assessment from practice and reports that single women are particularly vulnerable and at increased risk of being exploited.

Single Mothers

Single mothers are not only themselves affected by an emergency situation, but at the same time bear direct responsibility for a child. This means that a lack of income or insufficient income can more quickly threaten their ability to meet basic needs. The threshold for accepting risky work or exploitative arrangements may therefore be lowered. At the same time, without reliable childcare, access to employment and especially to legal employment that secures a livelihood may be more difficult.

Even short-term income losses or the loss of accommodation can have immediate consequences for the care of the child and leave less room to search for alternative solutions.

Single mothers are also often more dependent on finding any accommodation at all, even if it is unsafe or inappropriate. This can increase the pressure to accept problematic offers, which third parties can deliberately exploit. Demands for sexual favours or the exploitation of dependency may be particularly facilitated in such constellations.

At the same time, it can be considerably more difficult for single mothers to leave dangerous or exploitative situations. Decisions must always be made with regard to the immediate care and safety of the child. If alternative accommodation options or support structures are lacking, this may result in those affected remaining for longer in stressful or risky situations.

Psychological Distress and the Consequences of Trauma

Psychological distress and the consequences of trauma can further increase the risk of entering emergencies or of not being able to escape them effectively. They are not necessarily an independent source of risk, but affect in particular the ability to cope with existing situations of acute distress. The practical significance of this risk factor is also underlined by the fact that Cribs and Meraki assume, based on their work in Greece, that a very large proportion of female beneficiaries of international protection have already experienced sexualised violence.

Severe psychological distress can, for example, impair the ability to recognise risks early or to assess them appropriately. The ability to set boundaries in situations of pressure or to ask for support may also be limited. This can increase the risk, particularly in relationships of dependency, for example in connection with accommodation or informal work, that unsafe or exploitative situations arise or continue.

In addition, it may be more difficult for those affected to react quickly, make decisions or actively leave a dangerous situation. In combination with a lack of alternatives and limited resources, this may result in persons remaining for longer in unsafe or exploitative situations.

Psychological distress can also make it more difficult to build and use social networks and can impair access to stable employment. In this way, it indirectly contributes to existing emergencies persisting or worsening.

Risk of Sexualised Violence and Exploitation for Female Returnees

According to the available findings, female returnees are particularly at risk. The immediate period after return is especially risky, as return often represents a moment of rupture. Emergencies, particularly homelessness and extreme material hardship, can arise quickly and abruptly.

Especially in the first days and weeks after return, the risk of being left without protection and dependency on third parties is particularly high, especially with regard to accommodation, orientation and initial support. Although female returnees formally have protection status, in practice they often have no effective access to state assistance and support. In addition, they usually lack knowledge of where the few available support structures can be found and how they can be accessed. This

situation can be exploited by third parties. In this phase, female returnees are particularly vulnerable to supposed offers of support that may in fact be linked to exploitation or assault.

In the following weeks and months, too, the situation often remains unstable. Female returnees are often affected by several risk factors at the same time, including unsafe accommodation, no or insufficient opportunities to secure an income, lack of viable networks, lack of information, language barriers, and psychological distress or the consequences of trauma.

This concentration of risk factors places female returnees at particular risk of falling into dependency relationships or situations in which they lack protection, and thereby significantly increases the risk of sexualised violence and exploitation.

Conclusion

In summary, female beneficiaries of international protection and female returnees are exposed to a significant risk of sexualised violence and exploitation according to consistent reports by numerous organisations. Although the extent of these incidents cannot be precisely quantified, the available data and practice-based reports clearly indicate that this is a structural phenomenon and not merely a matter of individual cases.

The risk does not arise in isolation, but from the way several factors interact and reinforce one another. The starting point is often acute material hardship, particularly homelessness, unsafe accommodation and employment situations, and material need. These lead to dependency on third parties and lack of protection, creating situations that can be deliberately exploited by third parties, for example through sexual harassment, sexual assaults, demands for sexual favours, or other forms of sexual exploitation.

Single women, single mothers and women with psychological distress or trauma are particularly at risk. At the same time, structural conditions, especially an inadequate integration and support system, favour the emergence and persistence of such situations of dependency, lack of protection and vulnerability to exploitation.

The risk is particularly pronounced for female returnees, as several of these risk factors often coincide in their case. Especially in the period immediately after return, but also beyond it, there is regularly a concentration of dependency, lack of protection and limited access to support, which significantly increases the risk of sexualised violence and exploitation.

Concluding Remarks

Lack of State Safeguards and Limited Support

The starting point for many situations of hardship is the absence or insufficiency of a state safety net for transitional and emergency situations. This becomes particularly apparent after the granting of international protection or after a return to Greece: in such situations, there is no reliable state mechanism that provides accommodation or basic support. According to the available findings, existing support programmes such as HELIOS+ or the programme “Housing and Work for the Homeless” cannot close this gap, as they have only limited capacity, are subject to access requirements, and do not reliably reach beneficiaries of international protection or returnees. Municipal or state-supported homeless shelters also do not provide a reliable alternative, as existing capacities fall far short of need and access is associated with significant practical barriers.

In practice, responsibility for addressing such emergencies is therefore largely shifted to non-state support structures, in particular civil society and church-based organisations. Despite limited resources and considerable strain, these organisations provide essential support in many cases, but are far from able to meet the existing need. As a result, in many cases, those affected are largely left to cope with acute material hardship themselves.

Blocked Access to Regular Housing and Employment

However, the reliable access to the labour and housing market that is necessary to address these problems is, in practice, significantly impeded for beneficiaries of international protection by a range of formal, practical and structural barriers. These include, among others, bureaucratic requirements, inconsistent administrative practice, rising rents and living costs, the behaviour of landlords and employers, language barriers, lack of networks, and gender-specific disadvantages.

In addition, central requirements for accommodation, work and obtaining documents are often interdependent. Without the required documents and forms of proof, legal employment or access to support programmes is extremely difficult to obtain. Without income or proof of employment, renting an apartment is in turn regularly made considerably more difficult. Where stable accommodation is lacking, the basis for further steps towards obtaining documents, finding work and stabilisation is often also absent. Individual obstacles can therefore block several further steps and reinforce existing problems.

Informal Forms of Accommodation and Work as Emergency Strategies

Under the conditions described, beneficiaries of international protection are often left with no option but to resort to informal forms of housing and employment in order to avert homelessness or destitution, at least in the short term. However, these are associated with substantial risks, dependencies and protection gaps.

According to the available findings, unofficial hostels do not constitute a dignified, acceptable or reliable accommodation alternative. They often do not offer any reliable prospect of stay, meaning that those affected may again be at risk of homelessness at short notice. In addition, these forms of accommodation are regularly characterised by overcrowding, lack of hygiene, lack of privacy, safety risks, and relationships marked by dependency and exploitation. Longer stays can place a considerable burden on mental health and further impede stabilisation.

Informal work does not provide a reliable basis for securing a livelihood. In some cases, pay is significantly below the at-risk-of-poverty threshold, and work is often short-term, irregular and not protected under labour law. It is particularly serious that those affected are generally not protected in cases of illness or workplace accidents, which means that income, accommodation and health may be at risk at the same time. The power imbalances that characterise informal work facilitate wage

withholding, excessively long working hours, arbitrary dismissals, intimidation and exploitation, sometimes in particularly serious forms.

Lack of alternatives and the pressure to secure accommodation, food and income in the short term may also lead those affected to accept conditions that they would not accept under other circumstances, and may significantly limit their actual ability to reject or leave such conditions. Informal accommodation and work opportunities therefore cannot simply be understood as realistic ways of securing accommodation or a livelihood. Rather, they are often unstable emergency strategies that protect beneficiaries of international protection and returnees only to a limited extent from homelessness or destitution, while at the same time exposing them to increased risks of undignified living and working conditions, exploitation and assaults.

Entrenchment of Precarious Living Situations

Once beneficiaries of international protection find themselves in such precarious situations, this also reduces the likelihood that they will be able to find viable solutions independently. Homelessness, short-term accommodation with changing third parties, or stays in unstable informal accommodation mean not only a lack of protection and privacy. They also mean that a considerable part of the available time and energy must be spent on meeting immediate basic needs.

Under such conditions, it becomes significantly more difficult to pursue administrative procedures, obtain documents, search for work or access support services. Lack of financial resources often prevents the use of paid support, for example in obtaining documents. At the same time, those affected often have to spend considerable time finding, reaching and waiting at free food distributions and shower or laundry facilities, while also trying to secure short-term overnight options. Lack of rest, inadequate hygiene, psychological pressure and despair can further impair the ability to search for work and stabilise one's living situation.

These practical burdens also explain why informal solutions do not necessarily enable a transition to more stable conditions after a short period. Contrary to the assumption sometimes made that such informal solutions could merely bridge short transitional phases, the available findings show that they often become entrenched over longer periods of time. Those affected frequently move back and forth between homelessness and short-term informal forms of accommodation, as well as between unstable informal work and unemployment. The fact that, under these conditions, they often have no realistic possibility of leaving exploitative or undignified conditions can create a feeling of deep powerlessness and degradation. At the same time, these situations do not provide reliable protection against renewed homelessness or destitution. Rather, they can keep those affected in precisely the living conditions from which it is difficult to escape again due to missing documents, lack of income, lack of stable accommodation and lack of support.

Additional Risks for Returnees

This dynamic affects returnees in a particularly pronounced way. While the deficits in state reception and support structures described above generally apply to beneficiaries of international protection as a whole, returnees are often confronted with these deficits immediately upon arrival and from a particularly unstable initial situation. They frequently return to Greece without viable networks, without orientation in the current support and administrative system, and without any secure prospect of income. After a longer absence, they often lack precisely the contacts and knowledge that would be necessary to find accommodation, work or support at short notice. Returnees therefore face a particularly high risk of falling into homelessness, unstable accommodation situations or other precarious living conditions immediately after return, and of remaining in such situations for a longer period due to the mechanisms described.

In addition, central documents are often expired, lost, no longer accessible or not handed over by the authorities of the returning state upon return. This concerns precisely those documents that are of central importance for further steps, such as residence permits, AFM, AMKA or Taxisnet access. Missing documents often block at an early stage central routes to legal employment, support programmes or healthcare, or make access to them even more difficult. This further increases the risk of remaining in precarious living conditions.

Specific Risks for Female Beneficiaries of International Protection

Female beneficiaries of international protection are not merely affected by the structural problems described above in the same way as men. Rather, certain informal survival strategies that male beneficiaries of international protection can sometimes resort to are available to them to a lesser extent. At the same time, the alternatives that are more likely to be accessible to female beneficiaries of international protection are often unsafe, marked by dependency or associated with specific protection risks.

With regard to access to informal work, the findings show that physically demanding jobs requiring relatively few formal qualifications are significantly less often accessible to female beneficiaries of international protection than to men. Female beneficiaries of international protection are therefore more likely to be limited to sectors such as hospitality, tourism or domestic work. These are, in some cases, more strongly shaped by language or communication requirements. At the same time, repeated reports of exploitation, dependency, poor working conditions, sexual harassment and sexualised violence come precisely from these sectors.

Informal accommodation options are also more limited and riskier for female beneficiaries of international protection. According to the findings of the report, unofficial hostels are significantly less often accessible to them than to men. Where female beneficiaries of international protection can stay there at all, significant protection gaps often exist, in particular a lack of safe spaces to withdraw to, lack of privacy, unsafe sanitary facilities and insufficient control over who has access to the rooms.

Emergencies in which female beneficiaries of international protection depend on third parties also increase the risk of exploitation and sexualised violence. This applies in particular in situations of homelessness or threatened homelessness, accommodation provided by third parties, and informal work. Especially where accommodation, income or protection depend on individual persons, power relationships arise that can be exploited by third parties. In the case of female returnees, these risks can become particularly concentrated because several risk factors often coincide after return.

Precisely where safe and reliable alternatives are lacking, female beneficiaries of international protection are placed in situations in which they must weigh different dangers against one another. Short-term accommodation with third parties may offer protection from homelessness, but at the same time may entail dependency, loss of control or an increased risk of assault. Refusing such accommodation, in turn, may result in homelessness and acute lack of protection.

Overall Assessment

In summary, the available findings show that the precarious situation of many beneficiaries of international protection and returnees in Greece cannot be explained solely by individual, isolated access barriers, but is shaped by the interaction of several structural obstacles. What is decisive in this regard is not whether rights, programmes or informal options exist in the abstract, but whether they are accessible to those affected under the actual conditions and enable realistic stabilisation. Lack of state safeguards, limited support, administrative barriers, missing documents, impeded access to work and accommodation, and the risks associated with informal fallback strategies mutually reinforce one another and can entrench precarious living situations. Informal work, unofficial hostels and accommodation with third parties do not provide a reliable basis for securing accommodation or a livelihood. For returnees, including female returnees, as well as for female beneficiaries of international protection, additional risks and restrictions exist that considerably increase the danger of undignified living and working conditions, as well as violence and exploitation.

For returnees, these structural obstacles, under the conditions identified in the course of this research, amount to a real risk that, after returning to Greece, they will not have effective access to accommodation, means of securing a livelihood, or a basis for stabilisation, but will instead fall into homelessness, destitution or other precarious and degrading living situations and remain in such situations.

Annexes

Annex 1: Overview of the Situation of the Interviewed Returnees

The following overview is based on a total of nine interviews with returnees. The case descriptions have been anonymised and partly generalised in order to protect the privacy of those affected. Information on age, origin, family situation, places of residence, dates and other circumstances has only been included where necessary to contextualise the respective case. Individual details have been blurred or omitted in order to prevent identification of the persons concerned. This does not affect the substantive significance of the cases.

Interviewee 1

Situation After International Protection Was Granted (Before Leaving Greece)

The interviewee is a young adult woman. She was granted refugee status in Greece in mid-2024. On the same day, she was told to leave the camp. She had no accommodation or work and initially continued to hide in the camp for around three weeks. After she was discovered during an inspection, she was removed from the camp by security staff.

She then went to Athens without any financial means. Shortly afterwards, she travelled together with two other persons to an agricultural region in order to work in the orange harvest. The wage was EUR 20 per day. Accommodation was provided in a large warehouse where men and women slept together. There were neither sanitary facilities nor protected areas for women. Because she feared harassment, she was unable to sleep at night. After about one week, she therefore left the job. She received no payment, as the employer stated that she had not worked for a full month. She had previously financed the journey with borrowed money.

Back in Athens, she looked for overnight accommodation in a bar, a meeting point for people from her community. Other women took her to unofficial accommodation where up to ten persons slept in one room, sometimes on mattresses on the floor or in shared beds. The cost for one month was around EUR 140–150, which she could not afford. She was therefore only able to stay there secretly and for one or two nights, after which she had to look for new overnight options.

On many nights, she managed to find a place to sleep at short notice. On other nights, she had to stay in the bar and tried to sleep there on a sofa. She describes great uncertainty and daily worry about where she would be able to spend the next night. She received one meal per day at a community centre and was occasionally able to shower there, but had no possibility to wash her clothes regularly.

The interviewee reports that men deliberately try to exploit women in precarious situations. She describes a specific incident in which a man offered her accommodation and said that she could stay with him for as long as she wanted. During the night, he raped her at knifepoint. He told her that no one would believe her and that she could not go to the police because she had come to him voluntarily. She was then expelled from the accommodation and was again left on the street without a place to sleep.

Afterwards, she continued to be harassed by this man. He had her contact details and passed them on to other men, claiming that she was “available” because of her precarious housing situation. Other men then also contacted and harassed her. According to her, these experiences were a major reason for her departure from Greece.

Return to Greece and Situation Afterwards

After the final rejection of her asylum application in Germany, she returned to Greece in autumn 2025 out of fear of deportation and possible consequences for her Greek documents. At that time, she still had valid Greek documents.

For the first two nights after her arrival, hotel accommodation was paid for through a private contact. She had already organised this from Germany. An organisation then paid for short-term accommodation in a hostel. During this period, she received one meal per day at a community centre and was able to meet her basic hygiene needs there and at the hostel.

From the time of her return, she actively tried to obtain support and contacted many different organisations, including the HELIOS+ project. There, she was merely placed on a waiting list. Despite several follow-ups per week, she received no support. After she later found a job, she was told that she was no longer eligible for support because of her employment, although she still had no accommodation of her own.

After about six weeks, she obtained a place in shared accommodation through an NGO. The accommodation is limited to a few months.

Employment and Economic Situation

After her return, the interviewee searched intensively for work. She approached numerous restaurants in Athens in person and also applied to hotels. She regularly received the response that Greek language skills were required. Since her return, she has tried to gain access to a Greek language course, but had not been able to secure a place by the time of the interview.

Eventually, after two months, she found work in a restaurant. She works there as a dishwasher and cleaner six days per week, around 55 hours in total (9 hours per day during the week and 10 hours at the weekend), and receives a monthly income of EUR 450. She reports that although she has an employment contract, she can be dismissed at any time and has no actual security. She only obtained the documents necessary for legal employment several months after starting work, with the help of a social worker.

In view of rental prices, she is unable to rent accommodation independently. She expresses serious concerns about her future after the temporary accommodation ends.

The interviewee describes her return to Greece as extremely burdensome and emphasises that, under the current conditions, she has to rebuild her life practically from scratch.

Interviewee 2

Situation Before Return to Greece

The interviewee is in his mid-twenties and comes from Syria. He travelled to Germany while his asylum procedure was still pending because he has relatives there and had no family ties in Greece. It was only during the court proceedings in Germany that he learned that he had already been granted international protection in Greece.

Return to Greece and Initial Situation

At the end of 2024, he was deported to Greece by the police. Upon arrival at Athens airport, only his documents were checked. There was no further interview or information about possible support services. In particular, he received no information on where he could obtain accommodation or other assistance. At the time of his return, he also had neither a Greek residence permit nor a travel document.

After leaving the airport, he searched for accommodation until late in the evening, which he describes as very stressful. He eventually found a hotel room, for which he had to pay an excessive price. Due to lack of financial means, he was able to stay there for only one night.

Access to Support and Stay in the Camp

After leaving the hotel, he met other Arabic-speaking persons who told him that he first had to apply for Greek documents and gave him contact details of NGOs. He contacted several organisations, but received only limited support. One organisation eventually helped him apply to the Greek Asylum Service for the issuance of his documents. As a result, he was temporarily accommodated in a refugee camp on the mainland because he did not yet have a residence permit.

He spent around four months there. He describes the living conditions in the camp as extremely poor.

Homelessness and Search for Work

After his Greek residence permit and travel document were issued, he went to a Greek island because he had been told that work opportunities would be better there. At first, he was unable to find accommodation and had to sleep in a park for three days.

He then found a place in an unofficial hostel, where he shared a small room with around ten other persons. The living conditions were precarious: during the summer months, temperatures were high, and there was also a bedbug infestation. Later, there was a scabies infestation in the unofficial hostel, and he himself was diagnosed with scabies by a doctor.

At the same time, securing his livelihood was difficult. He worked in skilled manual work and already had relevant professional experience from his country of origin. However, the work was very irregular. At times, he was able to work only about one day every ten days. During this phase, he contacted an aid organisation and stated that he did not know his rights and was urgently looking for accommodation.

Current Situation

He was recently hired by a business where he had previously worked on a day-by-day basis and has an employment contract, but no health insurance. Because of the stable employment, he was able to rent a one-room apartment with a private bathroom. He received help from his employer in obtaining the documents necessary for employment.

The interviewee stated that he does not want to be reminded of the difficult period in the camp, during homelessness and in the overcrowded accommodation, which indicates that these experiences were a significant psychological burden for him.

Interviewee 3

Situation Before Return to Greece

The interviewee is from Syria and entered Greece in summer 2023. According to his account, he did not want to apply for asylum there, but was forced to give fingerprints under threat of being returned to his country of origin. As he did not consider Greece a suitable place to live and had no family ties there, he travelled onward to Germany only a few weeks later.

There, he applied for asylum, but his application was rejected. During his stay in Germany, he learned that he had already been granted international protection in Greece. After exhausting his legal remedies, he was informed that he had to leave Germany, otherwise he would face forced deportation.

Return to Greece

He returned to Greece in autumn 2025 in order to avoid a possible entry ban, as he wants to remain in contact with his relative living in Germany. Upon arrival, he was not interviewed by the Greek authorities and received no information on where he could find accommodation or support.

Accommodation Situation

The interviewee initially found accommodation in an unofficial hostel, where he slept on the floor together with six other persons. He had found this accommodation through a post on social media. The monthly cost was EUR 200. He felt forced to accept this offer because other accommodation options were not affordable for him.

On the very first night, his mobile phone was stolen; it contained both his contacts and digital copies of his documents. He had to borrow money to finance a new phone and food.

He describes the living conditions in the accommodation as extremely burdensome. He reports a lack of privacy, which meant that he mostly stayed outside the apartment and only went there to sleep or use the bathroom. At times, showering was not possible because there was no hot water. He states that basic activities such as washing, eating and sleeping were significantly impeded. He also describes the landlord as primarily motivated by financial interests and as not caring about the residents' living conditions.

After about one month, he found another place to stay with slightly improved conditions, which was still overcrowded and also cost EUR 200 per month.

Access to Documents and Support

Upon return, he had only an expired asylum seeker card and no other valid Greek documents. In order to obtain the necessary documents, including a residence permit, travel document, AFM, AMKA and a bank account, he contacted various offices and spent a total of around EUR 700 on support from intermediaries and private agencies. For example, it was necessary to provide proof of address, which he could not obtain through regular channels in his precarious housing situation. According to his account, he was therefore dependent on purchasing a forged solemn declaration on the black market in order to prove a registered address.

The interviewee reports that organisations providing support do exist, but that their capacities are clearly insufficient. According to him, it is sometimes necessary to queue at support services in the early morning in order to obtain an appointment.

Employment and Economic Situation

In order to secure his livelihood and cover the costs of obtaining documents, the interviewee began looking for work immediately after his return. He had experience in the hospitality sector and searched in particular for employment in restaurants with Arabic-speaking owners.

After six weeks, he found a job in which he worked nine hours per day and received EUR 40. He later found out that, formally, his contract covered only two hours per day. He reports constant video surveillance at the workplace and unpaid overtime.

After a few weeks, he suffered a serious arm injury at work. Medical care was provided only by an Arabic-speaking pharmacist; he received no support from his employer. After he was unable to come to work for two days because of the injury, he was dismissed without notice.

At the time of the interview, he was unemployed and dependent on financial support from his brother in Germany.

The interviewee describes his mental state upon returning to Greece as very poor. He describes feelings of shock, frustration and fear in view of the living conditions he encountered and states that he has not experienced a single good day since his return.

He describes his living circumstances as marked by exploitation. He perceives Greece as very unsafe. As an example, he refers to visible drug use in the area where he lives. He also reports widespread homelessness, particularly among returnees. In his assessment, access to adequate housing is the greatest problem for beneficiaries of international protection returning to Greece.

Interviewee 4

Situation After Return and Accommodation

The interviewee is around thirty years old and from Afghanistan. After being granted international protection in Greece, he travelled to Germany, where his asylum application was rejected. In order to avoid deportation, he returned voluntarily to Greece. Upon his return at the beginning of 2025, he was not interviewed by the police and received no information about possible support services. He had valid Greek documents. His residence permit was still valid until autumn 2025.

With the remaining financial resources from Germany, he was initially able to spend two nights in a hotel. He was then homeless for two days and slept in a park. According to him, conditions there were unsafe, including due to drug use in the area. He also reports that he and other persons were insulted and physically attacked.

Through another person, he found accommodation in an unofficial hostel. He rented a room for EUR 150 per month, which he shared with eight other persons. The apartment had a kitchen and a bathroom, but no washing machine. There was a serious bedbug infestation, which caused him sleep problems and severe skin irritation.

After about six months, he moved to another accommodation. There, too, eight to ten persons lived in two rooms. He sleeps on a mattress on the floor. The monthly cost remains EUR 150. He is unable to rent an apartment independently because of the high rental prices.

Employment and Economic Situation

The interviewee initially did not have sufficient financial means. His father supported him temporarily from Afghanistan, enabling him to pay the rent. However, this was not enough for food and other expenses. He reports that he often ate only once a day, mostly bread.

He searched intensively for work and, according to his account, approached more than 20 companies. However, because of a lack of language skills and missing documents, he was unable to find work. He has no AFM, AMKA or AMA. He remained without work for around four months.

After four months of unemployment, he found work on construction sites. The work is performed without an employment contract and is irregular. He is only deployed when needed, on average once or twice a week. In the two weeks before the interview, he received no work and therefore no income. A normal working day lasts around 12 hours and he is paid EUR 50. The work is physically very demanding and includes, among other things, carrying construction materials. He also reports degrading behaviour and insults by other workers because of his lack of Greek language skills.

Workplace Accident

In autumn 2025, he suffered a serious workplace accident in which he fell from a building and injured his leg. The leg was severely swollen and caused considerable pain. Due to the absence of an AMKA,

however, he was unable to access medical treatment. He states that he could obtain these documents through a private agency, but cannot afford the amount requested.

Co-residents only provided makeshift care for the injury. For around one and a half months, he was unable to walk, could not leave the apartment and could not work during this period. A co-resident supported him with food. He describes this period as very difficult, as he was in severe pain and could barely sleep because of the bedbug infestation.

At the time of the interview, the swelling had decreased, but he still had pain when walking. He is nevertheless working again despite these symptoms because he sees no alternative.

Documents

A few weeks before the interview, he was stopped by the police on the street and taken to the police station. There, his residence permit and travel document were withheld. Upon his release, only the travel document was returned to him. He was told that the residence permit had been lost. He was not given reasons for this. On the same day, he applied for the issuance of a new residence permit and has since been waiting for an appointment.

He describes his living situation in Greece as degrading and stated in the interview that he had considered returning to his country of origin despite the existing danger to his life. In his view, many returnees are affected by homelessness and unemployment. He also reports that some returnees leave again for other European countries because of the situation or develop mental health problems.

Interviewee 5

Situation After Return and Period of Homelessness

The interviewee is a young man from Iraq who travelled to Germany after being granted international protection. After his asylum application was rejected, he returned to Greece in autumn 2025. At the airport, he was not interviewed by the authorities and received no information about support services. He had valid Greek documents, but his residence permit expired shortly after his arrival. He also had no social contacts in Greece.

Immediately after his arrival, he went to the city centre, where he was homeless for several weeks. He slept outdoors and tried to find places that offered a certain degree of protection or were near police presence in order to feel safer. Weather conditions such as rain made the situation even more difficult. He slept on benches or on the ground and used his clothes and bag as makeshift protection. He had neither a sleeping bag nor a blanket. He had no access to sanitary facilities and could only occasionally shower and wash his clothes. He received food once a day through a community centre.

He made several efforts to end his homelessness. Access to a homeless shelter was not possible because it was full. He was refused support through the HELIOS+ project because more than two years had passed since he had been granted protection. According to him, he was also unable to receive support through the KEM.

After about three to four weeks, he found accommodation through other returnees in an unofficial hostel, where he could sleep in a small room with seven other persons for EUR 10 per night. Showering or washing clothes was not possible there. Because other persons were able to pay higher amounts for overnight stays, he had to leave the accommodation after about ten days and was then homeless again for around ten days.

Because of his homelessness, he was unable to submit an application to renew his residence permit, as he had no registered address. Only after some time was he able to find a person who allowed him to use their address for the application.

Almost two months after his return, he managed to rent a room with the support of a Greek person. The monthly cost was EUR 400. Renting the room was only possible because the supporting person took over communication with the landlord on his behalf. The room has no bed. He sleeps on a makeshift sofa, which significantly worsens his chronic back problems.

The accommodation is financed with borrowed money. At the time of the interview, he had debts of more than EUR 4,000 and had also sold personal belongings. It is unclear whether he will be able to continue financing the accommodation.

Employment and Working Conditions

The interviewee made intensive efforts to find work and attended a job fair around two and a half months after his return. There, he found work in a restaurant as a cleaner and dishwasher. He worked 10 to 12 hours a day and received an hourly wage of EUR 2.50. Under the working conditions, he could be dismissed at any time. In addition, there was no health insurance coverage during the first three months.

The commute to work took about one hour by bus. At times, work did not end until around 1:00 a.m., with work starting again at 8:00 a.m. the next morning, leaving him only four to five hours of rest. After about one month, he had to give up the job because of increasing and severe back pain.

The interviewee reports that, despite many efforts, there are currently no employment opportunities for him. He considers himself significantly disadvantaged because of health limitations, lack of language skills, lack of social networks and structural barriers.

Documents

At the time of his return, the renewal of his residence permit was due. During his homelessness, he was unable to prove the registered address required for this purpose. Only with the support of another person was he able to provide an address and submit the renewal application. At the time of the interview, he had been waiting for a response to his application for around five months.

He describes his current living situation as extremely precarious and burdensome. He reports traumatic flashbacks and diagnosed mental health conditions, but sees no possibility of starting treatment under the current conditions. He expresses the wish to travel again to Germany after approval of the renewal of his residence permit, where he has family ties.

Interviewee 6

Situation Before Return to Greece

The interviewees are two young sisters. After being granted international protection and receiving their residence permits and travel documents in 2024, they travelled onward to a Nordic country where close relatives were living. According to the sisters, they had never intended to remain in Greece, but wanted to live with their family. Their asylum application in that country was rejected, and they were asked to return to Greece. In order to avoid deportation, they returned to Greece in autumn.

Situation After Return and Initial Accommodation

Upon arrival, they were not interviewed by the authorities and received no information about support services. Their residence permits were still valid.

Accommodation for the first two nights was financed by their brother. After this period ended, they tried to obtain support from a women's organisation, but according to their account received no help. In order to avoid homelessness, they then had to finance a hotel stay themselves at short notice.

They were subsequently accommodated for one month through the help of an organisation in a non-state facility. There, they received food and had access to sanitary facilities. It was not possible to extend the stay beyond one month.

A social worker had referred them to HELIOS+. However, it was necessary for the sisters to first rent accommodation independently in order to obtain rent subsidies from HELIOS+. With the support of the social worker, they tried to find their own accommodation. Around 20 landlords and real estate agencies were contacted. The overwhelming majority refused to rent to them as foreign women. Two offers would have made it possible to rent accommodation, but required upfront payments totalling around EUR 1,200 for rent, deposit and estate agent fees. The sisters were unable to raise this amount. In addition, a bank account would have been necessary in order to rent an apartment. However, banks refused to open a bank account because the sisters had no proof of employment and no fixed address, but only temporary accommodation.

Access to Employment

Attempts to find work were unsuccessful. This was due in particular to the lack of a fixed registered address, a bank account and language skills. Despite support from several organisations, they were unable to access any employment opportunities.

Further Developments

The sisters stated that they had mainly spent their previous lives within the family environment. Separation from their family and life as young women without family support in a foreign country led to a strong feeling of insecurity and emotional distress. Against the background of the lack of prospects in Greece, the threat of homelessness, the absence of a social network and separation from their family, the sisters decided to leave Greece again. One month after their return, they travelled back to the Nordic country to their family, despite the risk of another rejection and possible return.

Interviewee 7

Situation Before Return to Greece

The interviewee is in his mid-twenties and from an African country. After being granted international protection in 2020, he initially remained in the camp because he had no other accommodation options, while at the same time looking for ways to leave Greece. During this period, he worked in agriculture without an employment contract. He describes the working conditions as very poor. He reports exploitative conditions with unpaid overtime and inadequate accommodation. In 2021, he travelled onward to Switzerland. His asylum application there was rejected.

Situation After Return

As he no longer had a right to stay in Switzerland and was facing deportation, he returned to Greece at the beginning of 2024 with the support of an organisation. Upon arrival in Greece, he was not interviewed by the authorities and received no information about support services. An organisation from Switzerland had already organised accommodation for him before his return and provided him with EUR 100 for the journey to the accommodation. The accommodation is a shared apartment provided by an organisation. He emphasises that this support was decisive for him and stresses that the thought of what might have happened to him without this help is very distressing.

Upon return, he had his Greek documents, although his residence permit had already expired. According to his account, he was able to renew his residence permit within a few months.

Employment

The search for work was difficult because of a lack of language skills. It took around three months before he eventually found a job as a dishwasher in a restaurant through personal contacts.

According to the organisation supporting him, the working conditions were very unstable, and he repeatedly had to look for new jobs, none of which lasted longer than six months. In his last job, he worked around eight hours per day in a restaurant and was paid EUR 48 for this. Formally, however, he was declared for only four hours, while the remaining working time was performed informally. A few months before his interview with the author, the employment relationship ended. He was not entitled to unemployment benefits because he had only been partially declared.

Health Situation

The interviewee suffers from ongoing health problems and had undergone surgery in Switzerland shortly before his return to Greece. After his return, despite several attempts, he was unable to obtain medical follow-up care. He reports that even arranging an appointment is associated with considerable difficulties. He had also received psychological support in Switzerland. Access to comparable support in Greece was likewise not possible.

Current Situation

After losing his job, he was forced to use up his savings and additionally borrow money from friends. The search for new employment again proved difficult. He completed training in domestic care and then found part-time employment in this field after two months of searching.

At the time of the interview, he was living in his own apartment, which he had found through a colleague. However, because of his part-time employment, his financial situation is insecure. He expresses serious concerns that he may no longer be able to pay the rent in the future. Since it is unclear whether acquaintances can lend him further money, the loss of the apartment and subsequent homelessness cannot be ruled out.

Interviewee 8

Situation After Being Granted International Protection (Before Departure)

The interviewee comes from an Arabic-speaking country of origin and has a wife and several children, some of whom were still very young. The family received international protection in 2019. The interviewee managed to find employment in Greece and to rent an apartment for his family. In the context of this employment, according to his account, he became involved in a serious conflict with someone from his wider social environment. This was followed by repeated threats and attacks. The interviewee was severely physically assaulted and sustained injuries that required surgical treatment.

Despite the involvement of the police and court proceedings, threats and harassment continued. The interviewee did not consider himself and his family to be sufficiently protected.

First Departure and Return to Greece

Out of fear for his safety, he left Greece with his family and submitted another asylum application in Germany, which was rejected. The family was returned to Greece in 2023.

The threat situation continued after the return. The interviewee tried to hide, but according to his account was found again because of the local network of the person involved in the conflict. Despite administrative and judicial steps, the authorities did not succeed in ensuring effective protection. The interviewee also reports problems concerning police jurisdiction, which made effective investigation of incidents more difficult. The family left Greece again in spring 2024.

Second Return to Greece (2025)

After a further unsuccessful asylum application in another European country, the family was returned to Greece again at the beginning of 2025. Upon arrival, they received no information about support services. The family had valid Greek residence permits and travel documents, as well as an AFM, AMKA, AMA and a Greek bank account.

Accommodation and Economic Situation

The family had only limited financial means. For the first night, the interviewee was able to organise a hotel room at a reduced price in order to avoid homelessness with his family and young children. He then tried to obtain support from various organisations, but without success. For security reasons, he also had to proceed cautiously in searching for accommodation.

The family was temporarily able to stay for about one week in a room with a private individual, for which EUR 100 was paid. He subsequently managed to rent an apartment through a real estate agency. This was possible only because he had language skills and could provide proof of previous employment, and because he was able to indicate possible future income to the landlord. The first rent, deposit and estate agent fee were financed mainly through money borrowed from NGOs.

Attempts to Find Employment

The interviewee made intensive efforts to find work. He contacted numerous organisations and employment agencies and independently searched for employment in a large number of shops, supermarkets and restaurants. He stated that he would have accepted any kind of work and also specifically looked for work in the informal economy, since finding work was necessary in order to keep the apartment and avoid homelessness. However, his efforts remained unsuccessful.

According to a social worker supporting him, the interviewee had above-average qualifications. He spoke several languages, including English and Greek, had relevant work experience and met the formal requirements for legal employment. The social worker considered it remarkable that, despite these prerequisites and an intensive search for work, it was not possible for him to take up employment.

Health Situation

During his stay in Greece, the interviewee had to be hospitalised and was advised to undergo medication-based treatment. He was diagnosed with a chronic illness which, according to medical assessment, may be connected to the continuing stress.

Renewed Threats and Lack of Protection

According to his account, after the renewed return to Greece, the interviewee was again found and threatened by persons connected to the person involved in the earlier conflict. There were incidents in which he was followed and attempts were made to injure him. He was told that he could be found anywhere. His family was also exposed to serious threats.

Against this background, and because of the family's worsening economic situation, he concluded that no effective protection was available to him in Greece. Due to the lack of employment, there was a significant risk of homelessness, which would have made it impossible to protect the family from threats.

Further Developments

In view of the continuing threat situation, the lack of economic prospects and concern for the safety of his family, the interviewee decided to apply for voluntary return to their country of origin. The family left Greece three months after their return.

After returning to the country of origin, the family's situation remains very difficult. The interviewee's medical treatment is associated with high costs and is only accessible to a limited extent. The interviewee reports a deterioration in his health condition. His children are currently unable to attend school and have language difficulties because they largely grew up in Greece. In addition, the interviewee continues to express serious concerns for his own safety and that of his family.

Interviewee 9

Situation After Being Granted International Protection (Before Departure)

The interviewee is in his mid-twenties and comes from Afghanistan. He received international protection in 2018. Six months after being granted protection, he had to leave the refugee camp. He subsequently stayed temporarily with acquaintances, but was also repeatedly homeless and slept in parks. He reports that during this period he received only one meal per day. He was also in a poor mental state and saw no realistic prospect of finding employment. In 2020, he left Greece and travelled onward to Germany.

Situation After Return and Accommodation

After the rejection of his asylum application in Germany, he had to return to Greece in spring 2024. Even before his return, accommodation in a communal housing structure run by a non-state initiative had been organised through private support from Germany. He nevertheless describes the initial period after his return as marked by considerable stress and uncertainty. He had no savings and received no support from family or state authorities.

Documents

His Greek residence permit had already expired at the time of return. With the support of an organisation, he applied for renewal in spring 2024. The decision on the application was not issued until summer 2025, more than one year after the application was submitted. The residence permit was finally issued in autumn 2025, 18 months after the application. At that point, the residence permit was valid for only around six more months. At the time of the interview, the document was about to expire again.

Because of the ongoing renewal procedure, he was unable to take up legal employment for a long period. In addition, he had only an AFM, but no AMKA, no Taxisnet access and no bank account. Despite intensive efforts, including through personal contacts, he was unable to find employment during this period.

Employment and Informal Work

Only a few months before the interview, he managed to take up informal work through personal contacts. He helps with transport and removals. The work is on call and irregular. On average, he works around two days per week. However, it regularly happens that he has no work for several weeks. The agreed wage is around EUR 30 per working day.

The interviewee reports that the employer often does not pay the full wage. Because of his precarious situation and lack of alternatives, however, he feels compelled to continue the work. Despite intensive efforts to find alternative employment, he has so far been unable to do so.

At the time of the interview, around two years after his return, he was still able to remain in the accommodation of the non-state initiative. However, he reported that he would have to leave it in the near future. No alternative accommodation was available. Because of his financial situation and missing prerequisites, he did not consider himself able to rent accommodation independently and was therefore dependent on finding shared accommodation.

Annex 2: Inquiry from the Administrative Court of Hamburg

This annex reproduces the inquiry addressed to NAOMI Thessaloniki by the 12th Chamber of the Administrative Court of Hamburg, which prompted the preparation of this report. The questions submitted by the Court form the starting point for the structure and subject matter of the report.

The inquiry is reproduced in the German original and in English translation prepared by the author. Personal data, in particular names, personal email addresses and telephone numbers, have been redacted where necessary. The footer containing contact details, office hours, transport connections, parking information and the data protection notice has been omitted in the English translation.

Verwaltungsgericht Hamburg
Kammer 12

Verwaltungsgericht Hamburg, Lübeckertordamm 4, 20099 Hamburg

Naomi Thessaloniki
Ökumenische Werkstatt für Flüchtlinge
Ptolemaion 29A
54630 Thessaloniki

Durchwahl
[REDACTED]

Datum
04.12.2025

Sehr geehrte Frau Vakalis,

die Kammer 12 des Verwaltungsgerichts Hamburg ist u.a. zuständig für Klagen gegen Bescheide des Bundesamts für Migration und Flüchtlinge (Bundesamt), in denen das Bundesamt einen Asylantrag nach § 29 Abs. 1 Nr. 2 AsylG als unzulässig abgelehnt hat, weil ein anderer Mitgliedstaat der EU, nämlich Griechenland, bereits internationalen Schutz (Flüchtlingsschutz oder subsidiären Schutz) gewährt hat. Auf den durch Griechenland gewährten internationalen Schutz darf ein Asylantragsteller jedoch nicht verwiesen werden, wenn ihm in Griechenland eine unmenschliche oder erniedrigende Behandlung im Sinne von Art. 4 der Grundrechte-Charta der Europäischen Union (GRCh) droht.

Während das Bundesverwaltungsgericht bereits entschieden hat, dass jungen, gesunden und alleinstehenden Männern, denen in Griechenland internationaler Schutz zuerkannt wurde, bei einer Rückkehr dorthin grundsätzlich keine mit Art. 4 GRCh unvereinbaren Lebensbedingungen drohen (BVerwG, Urt. v. 16.4.2025, 1 C 18.24, juris), war das Bundesverwaltungsgericht mit der Situation von Frauen, denen in Griechenland internationaler Schutz zuerkannt wurde, bislang nicht befasst. Auch daher ist in der erstinstanzlichen Rechtsprechung aktuell umstritten, ob den betroffenen Frauen bei einer Rückkehr nach Griechenland mit Art. 4 GRCh unvereinbare Lebensbedingungen drohen. Die Kammer 12 des Verwaltungsgerichts Hamburg hat in einstweiligen Rechtsschutzverfahren bisher Abschiebemaßnahmen unterbunden und dies damit begründet, dass nicht ohne weiteres davon ausgegangen werden könne, dass bei nach Griechenland zurückkehrenden internationalen Schutzberechtigten mit dem weiblichen Geschlecht keine erhebliche Erhöhung des Risikos von mit Art. 4 GRCh unvereinbaren

Lübeckertordamm 4 - 20099 Hamburg - **Telefon 040 42843 - 7540 - Telefax 040 42843 - 7219**

Internet: www.verwaltungsgericht.hamburg.de

Datenschutzhinweise nach der Verordnung (EU) 2016/679: <http://justiz.hamburg.de/vg-service/>
oder ggf. unter der o.g. Telefonnummer

Sprechzeiten:

Montag bis Freitag 9.00 - 12.00 Uhr
oder nach Vereinbarung

Verkehrsverbindungen:

U-Bahn Lohmühlenstraße
S- u. U-Bahn Berliner Tor

Parkmöglichkeiten:

Tiefgarage Zufahrt Berliner Tor
(neben dem Studentenwohnhaus Nr. 3 -
entgeltpflichtig)

Lebensbedingungen verbunden ist. Insbesondere hat die Kammer die Frage aufgeworfen, ob Frauen auf alle Unterkunfts- und Erwerbsmöglichkeiten verwiesen werden können, auf die Männer verwiesen werden.

Die vorliegende Anfrage dient der weiteren Sachverhaltsaufklärung und bezieht sich ungeachtet des bereits vorliegenden Urteils des Bundesverwaltungsgerichts zur Situation männlicher international Schutzberechtigter in Griechenland auf die Situation von sowohl männlichen als auch weiblichen international Schutzberechtigten in Griechenland. Angesichts der derzeit im Fokus der deutschen verwaltungsgerichtlichen Rechtsprechung stehenden Situation weiblicher internationaler Schutzberechtigter in Griechenland wird jedoch darum gebeten, bei der Beantwortung der Fragen, soweit möglich, zwischen männlichen und weiblichen international Schutzberechtigten zu differenzieren und gegebenenfalls zu erläutern, inwiefern geschlechtsspezifische Umstände eine Rolle spielen.

1. Bitte beschreiben Sie einleitend kurz Ihre Tätigkeit und Expertise sowie diejenige von NAOMI Thessaloniki (im Folgenden nur: NAOMI) im Bereich der Flüchtlingshilfe in Griechenland.

2. Bitte beschreiben Sie, soweit möglich alle Ihnen aus eigener Anschauung bekannten Fälle von in den letzten zwei Jahren aus anderen EU-Ländern nach Griechenland zurückgekehrten oder abgeschobenen international Schutzberechtigten. Die Beschreibung sollte folgende Punkte enthalten:

- Alter, Geschlecht, Familienstand, Nationalität, etwaige Krankheiten oder Behinderungen, Datum der Rückkehr;
- Land, aus dem die betreffende Person zurückgekehrt bzw. abgeschoben worden ist;
- Situation in Griechenland nach Rückkehr, insbesondere im Hinblick auf Unterkunft und Erwerbstätigkeit;
- etwaige besondere Schwierigkeiten oder Probleme, mit denen die betroffene Person konfrontiert war.

3. Wie viele international Schutzberechtigte haben Sie im Jahr 2025 unterstützt, insbesondere (a) mit einer Unterkunft, (b) bei der Suche nach einer Unterkunft bzw. (c) bei der Erlangung der erforderlichen Dokumente, eines Bankkontos etc., um den Zugang zum formellen Wohn- und Arbeitsmarkt zu erleichtern?

Bitte geben Sie Ihre Erfahrungen mit der Unterstützung von international Schutzberechtigten bei der Erlangung der für den Zugang zu legaler Arbeit und legal angemieteten Wohnraum

erforderlichen Dokumente (Steueridentifikationsnummer, Sozialversicherungsnummer, Bankkonto etc.) wieder.

Gibt es Fälle von international Schutzberechtigten, die Sie im Jahr 2025 trotz eines Hilfeersuchens nicht unterstützt haben? Wenn ja, wie viele Fälle waren dies, um welche Form von Hilfe wurde ersucht, und warum konnte diese nicht angeboten werden?

4. Gibt es in Griechenland für aus anderen EU-Ländern zurückkehrende international Schutzberechtigte die Möglichkeit, in die für Asylbewerber vorgesehenen Flüchtlingslager zurückzukehren und dort, ggf. auch informell (geduldet), unterzukommen? Sind Ihnen entsprechende Fälle aus den letzten zwei Jahren bekannt?

Anm.: Dem Gericht ist bekannt, dass Personen, denen internationaler Schutz gewährt wurde, die ihnen während des laufenden Asylverfahrens zugewiesene Unterkunft umgehend verlassen müssen. Allerdings gab es in der Vergangenheit (vereinzelte) Berichte, wonach aus dem Ausland zurückkehrende international Schutzberechtigte in diese Unterkünfte zurückgekehrt sind. Das schweizerische Bundesverwaltungsgericht geht sogar allgemein davon aus, dass international Schutzberechtigte nach ihrer Rückkehr um (außerordentliche) Unterbringung in einer Asylunterkunft ersuchen können (vgl. BVerwG (Schweiz), Urt. v. 11.9.2025, D-2590/2025).

5. Gibt es in Griechenland für international Schutzberechtigte, insbesondere für solche, die aus anderen EU-Ländern zurückgekehrt sind, eine realistische Perspektive, in Obdachlosenunterkünften, die von kommunalen oder anderen staatlichen Trägern betrieben werden, unterzukommen? Sind Ihnen entsprechende Fälle aus den letzten zwei Jahren bekannt? In welchem Umfang werden Schlafplätze in solchen Unterkünften in Griechenland angeboten? Falls es die genannte Perspektive aus Ihrer Sicht nicht gibt, benennen Sie bitte die Gründe hierfür.

Anm.: Das Bundesverwaltungsgericht geht bislang davon aus, dass Schutzberechtigte im Falle einer Rückkehr nach Griechenland dort eine (ggf. temporäre, wechselnde) Unterkunft oder Notschlafstelle mit einem Minimum an erreichbaren sanitären Einrichtungen, die von kommunalen Trägern oder nichtstaatlichen Hilfsorganisationen betrieben werden, finden können (vgl. BVerwG, Urt. v. 16.4.2025, 1 C 18.24, juris Rn. 43). Die Kammer 12 des Verwaltungsgerichts Hamburg hat sich dieser Einschätzung bisher nicht angeschlossen (vgl. VG Hamburg, Urt. v. 21.7.2025, 12 A 4453/25, juris Rn. 46 ff.) und zur Klärung dieser Frage eine Auskunft des Auswärtigen Amtes angefordert (vgl. VG Hamburg, Beschl. v. 26.9.2025, 12 A 7005/25, juris).

6. Gibt es in Griechenland für international Schutzberechtigte, insbesondere für solche, die aus anderen EU-Ländern zurückgekehrt sind, eine realistische Perspektive, in Unterkünften oder

Notschlafstellen die von nichtstaatlichen Stellen (Nichtregierungsorganisationen, karitative und sonstige private oder kirchliche Einrichtungen) betrieben oder zur Verfügung gestellt werden, unterzukommen? Sind Ihnen entsprechende Fälle aus den letzten zwei Jahren bekannt? In welchem Umfang werden solche Unterkünfte und Notschlafstellen in Griechenland angeboten? Bietet NAOMI solche Unterkünfte bzw. Notschlafstellen an? Falls es die genannte Perspektive aus Ihrer Sicht nicht gibt, benennen Sie bitte die Gründe hierfür.

Siehe hierzu bereits die Anm. zu 5. Auf Ihrer Internetseite (<https://naomi.gr/projekte/nothilfe-fur-fluchtlinge/>) schreiben Sie u.a., dass NAOMI schnell und unbürokratisch u.a. mit einer Unterkunft helfen kann und Familien auch mit Zuschüssen für Mieten und Mietnebenkosten unterstützt werden.

7. Gibt es in Griechenland für international Schutzberechtigte, insbesondere auch für solche, die aus anderen EU-Ländern zurückgekehrt sind, eine realistische Perspektive, legal eine Wohnung anzumieten? Sind Ihnen entsprechende Fälle aus den letzten zwei Jahren bekannt? Falls es die genannte Perspektive aus Ihrer Sicht nicht gibt, benennen Sie bitte die Gründe hierfür.

8. Wo und auf welche Weise finden international Schutzberechtigte, die weder in Flüchtlings- noch in Obdachlosenunterkünften unterkommen und auch legal keine Wohnung anmieten können, eine Unterkunft oder zumindest eine Schlafmöglichkeit? Um welche Art von Unterkunft bzw. Schlafmöglichkeit handelt es sich? Welche Erkenntnisse haben Sie zu den Lebensverhältnissen in solchen Unterkünften (insbesondere zur Größe der Unterkunft, zu der Zahl der Untergebrachten, zur Verfügbarkeit von sanitären Einrichtungen in der Unterkunft oder anderweitiger Erreichbarkeit von Waschmöglichkeiten, zu den allgemeinen hygienischen Verhältnissen sowie zu Rückzugsmöglichkeiten für Frauen)? Stehen diese Unterkünfte und Schlafmöglichkeiten Männern und Frauen in gleichem Maße zur Verfügung? Falls dies nicht der Fall sein sollte, benennen Sie bitte die Gründe hierfür.

Anm.: Die Kammer 12 des Verwaltungsgerichts geht aktuell davon aus, dass jedenfalls nichtvulnerable männliche internationale Schutzberechtigte – insbesondere über Migrantennetzwerke und nichtstaatliche Akteure – Schlafmöglichkeiten finden (können), z.B. in informell (unter-)vermieteten Wohnungen, behelfsmäßigen Unterkünften, staatlich geduldeten informellen Siedlungen oder sonstigen einfachsten Camps, z.B. in der Nähe landwirtschaftlicher Betriebe (vgl. VG Hamburg, Urt. v. 21.7.2025, 12 A 4453/25, juris Rn. 57 f., 93). Das Verwaltungsgericht Cottbus hat jüngst entschieden, dass diese Schlafmöglichkeiten grundsätzlich auch Frauen zumutbar sind und es insbesondere keine hinreichenden Belege dafür gibt, dass Frauen dort mit beachtlicher Wahrscheinlichkeit sexuelle Übergriffe drohen (vgl. VG Cottbus, Beschl. v. 20.11.2025, 5 L 599/25.A, juris Rn. 30).

9. Sind Ihnen Fälle aus den letzten zwei Jahren bekannt, in denen international Schutzberechtigte, insbesondere auch solche, die aus anderen EU-Ländern zurückgekehrt sind, in dem Sinne obdachlos waren, dass sie gezwungen waren, im Freien, beispielsweise auf der Straße oder auf einer Parkbank, zu schlafen? Falls ja: Für welche Zeiträume dauerte dieser Zustand (jeweils) an? Handelte es sich hierbei Ihrer Einschätzung nach um Einzelfälle oder ist dies ein häufiger auftretendes Phänomen? Bitte benennen Sie die Gründe für Ihre Einschätzung.

Anm.: Der Kammer 12 des Verwaltungsgerichts liegen aktuell keine verlässlichen Statistiken über den prozentualen Anteil und die absolute Zahl von international Schutzberechtigten, die obdachlos sind, vor. Auf Ihrer Internetseite (<https://naomi.gr/projekte/nothilfe-fur-fluchtlinge/>) schreiben Sie u.a., dass NAOMI immer wieder Flüchtlingen auf der Straße, in Bauruinen, unter Brücken und in Parks hausend Sachleistungen gegeben hat.

10. Gibt es in Griechenland für international Schutzberechtigte, insbesondere für solche, die aus anderen EU-Ländern zurückgekehrt sind, eine realistische Perspektive, eine legale Erwerbstätigkeit (d.h. unter grundsätzlicher Einhaltung arbeits-, sozial- und steuerrechtlicher Vorschriften) aufzunehmen? Sind Ihnen entsprechende Fälle aus den letzten zwei Jahren bekannt? Falls es die genannte Perspektive aus Ihrer Sicht nicht gibt, benennen Sie bitte die Gründe hierfür.

11. Gibt es in Griechenland für international Schutzberechtigte, insbesondere auch für solche, die aus anderen EU-Ländern zurückgekehrt sind, eine realistische Perspektive, eine irreguläre Erwerbstätigkeit („Schwarzarbeit“, „Schattenwirtschaft“) aufzunehmen? Sind Ihnen entsprechende Fälle aus den letzten zwei Jahren bekannt? Falls es die genannte Perspektive aus Ihrer Sicht nicht gibt, benennen Sie bitte die Gründe hierfür.

Anm.: In der deutschen Rechtsprechung werden zurückkehrende international Schutzberechtigte regelmäßig auf Erwerbstätigkeiten in der Schattenwirtschaft, insbesondere in der Bauwirtschaft, in der Landwirtschaft sowie im Tourismus und in der Gastronomie verwiesen. Auch die Kammer 12 des Verwaltungsgerichts Hamburg geht aktuell davon aus, dass jedenfalls männliche internationale Schutzberechtigte eine Erwerbstätigkeit in der Schattenwirtschaft finden und aufnehmen können.

In welchen Bereichen gibt es die Möglichkeit, eine Erwerbstätigkeit ohne oder nur mit ganz rudimentären Kenntnissen der griechischen Sprache auszuüben? Sind hierfür, soweit es diese Möglichkeit gibt, wenigstens rudimentäre Kenntnisse der englischen oder einer bestimmten anderen Sprache erforderlich? Bestehen solche Möglichkeiten in der Bauwirtschaft, in der Landwirtschaft oder im Tourismus und der Gastronomie (z.B. Reinigungskraft oder

Tellerwäscher, ggf. unter Supervision von Landsleuten, die Griechisch oder eine bestimmte andere Sprache sprechen)?

Anm.: Die Kammer 12 des Verwaltungsgerichts Hamburg geht davon aus, dass es eine Reihe von Tätigkeiten gibt, insbesondere in der Bau- und Landwirtschaft, die auch mit (nur) rudimentären Kenntnissen der griechischen oder wenigstens der englischen Sprache ausgeübt werden können. In welchem Umfang in anderen Bereichen, insbesondere im Tourismus und in der Gastronomie oder im gewerblichen Bereich (z.B. als Näher oder Schneider) Sprachkenntnisse erforderlich sind, entzieht sich aktuell der genauen Kenntnis der Kammer.

Inwieweit unterscheiden sich die Möglichkeiten für Frauen und Männer, eine Erwerbstätigkeit aufzunehmen? Bestehen für Frauen besondere Nachteile?

Anm.: Die Kammer 12 des Verwaltungsgerichts Hamburg hat in Eilverfahren die Frage aufgeworfen, ob die Erwerbsmöglichkeiten in der Schattenwirtschaft, insbesondere in der Bau- und der Landwirtschaft, Frauen tatsächlich in gleichem Maße offenstehen wie Männer (vgl. VG Hamburg, Beschl. v. 5.3.2025, 12 AE 1165/25, juris Rn. 7). Andere Gerichte sehen hingegen keine Gründe, warum die Erwerbsmöglichkeiten in der Schattenwirtschaft – mit Ausnahme der Erwerbsmöglichkeiten in der Bauwirtschaft – Frauen nicht in gleichem Maße offenstehen sollten wie Männern (vgl. VG Cottbus, Beschl. v. 20.11.2025, 5 L 599/25.A, juris Rn. 23 ff.).

12. Bitte beschreiben Sie, falls Ihnen bekannt und wenn möglich anhand Ihnen bekannter konkreter (Einzel-)Fälle, die Arbeitsbedingungen in der Schattenwirtschaft, insbesondere im Hinblick auf die folgenden Aspekte:

- Spannbreite der Vergütung
- Arbeitszeiten
- Stellung einer Unterkunft im Rahmen der Arbeitstätigkeit (z.B. als Erntehelfer in einem landwirtschaftlichen Betrieb)
- Saisonalität / Schwankungen in der Verfügbarkeit von Arbeitsmöglichkeiten.

Bitte beschreiben Sie insoweit auch, mit welchen Schwierigkeiten international Schutzberechtigte, die in der Schattenwirtschaft arbeiten, am häufigsten bzw. am stärksten konfrontiert sind. Stehen Frauen dabei vor besonderen Herausforderungen?

Anm.: Die Kammer 12 des Verwaltungsgericht Hamburg geht in Einklang mit der Rechtsprechung des Bundesverwaltungsgerichts davon aus, dass der bloße Umstand, dass eine Erwerbstätigkeit in der Schattenwirtschaft stattfindet, noch keine unmenschliche oder erniedrigende Behandlung im Sinne von Art. 4 GRCh darstellt, sofern diese Erwerbstätigkeit für den Schutzberechtigten als Arbeitnehmer nicht sanktionsbewehrt sind oder Sanktionen gegen ihn jedenfalls tatsächlich nicht verhängt werden (vgl. BVerwG, Urt. v. 16.4.2025, 1 C 18.24, juris Rn. 45). Eine unmenschliche oder erniedrigende Behandlung dürfte danach allenfalls aufgrund der Arbeitsbedingungen in der Schattenwirtschaft in Betracht kommen.

13. Bitte teilen Sie mit, in welchem Umfang international Schutzberechtigte, insbesondere auch solche, die aus anderen EU-Ländern zurückkehren, tatsächlich erwarten können, bei der Erlangung einer Unterkunft und einer Erwerbstätigkeit durch das Projekt HELIOS+ unterstützt zu werden. Sind Ihnen entsprechende Fälle bekannt? Bitte benennen Sie die Gründe für Ihre Einschätzung.

Anm.: Das Bundesverwaltungsgericht verweist zurückkehrende internationale Schutzberechtigte, deren Schutzuerkennung bei der Rückkehr nach Griechenland nicht länger als 20 Monate zurückliegt, auch auf das Programm HELIOS+ (vgl. BVerwG, Urt. v. 16.4.2025, 1 C 18.24, juris Rn. 29). Die Kammer 12 des Verwaltungsgerichts Hamburg geht hingegen bisher davon aus, dass es unwahrscheinlich ist, dass zurückkehrende internationale Schutzberechtigte die Leistungen von HELIOS+ in Anspruch nehmen können (vgl. VG Hamburg, Urt. v. 21.7.2025, 12 A 4453/25, juris Rn. 43).

14. Bitte teilen Sie mit, in welchem Umfang international Schutzberechtigte, insbesondere auch solche, die aus anderen EU-Ländern zurückkehren, tatsächlich erwarten können, bei der Erlangung einer Unterkunft und einer Erwerbstätigkeit durch das Programm „Wohnen und Arbeiten für Obdachlose“ unterstützt zu werden. Sind Ihnen entsprechende Fälle aus den letzten zwei Jahren bekannt? Bitte benennen Sie die Gründe für Ihre Einschätzung.

Anm.: Das Bundesverwaltungsgericht verweist zurückkehrende internationale Schutzberechtigte auch auf das Programm „Wohnen und Arbeiten für Obdachlose“, das u.a. Miet- und Beschäftigungszuschüsse vorsehen soll (vgl. BVerwG, Urt. v. 16.4.2025, 1 C 18.24, juris Rn. 41). Die Kammer 12 des Verwaltungsgerichts Hamburg hat die Frage aufgeworfen, ob dieses Programm zurückkehrenden international Schutzberechtigten tatsächlich (realistischerweise) zur Verfügung steht und hat diesbezüglich eine Auskunft beim Auswärtigen Amt angefordert (siehe Nr. 17).

15. Ist es nach den Erfahrungen aus Ihrer Beratungspraxis möglich, aus zunächst informellen Verhältnissen (ohne registrierten Wohnsitz und legale Arbeit) die erforderlichen Dokumente für

den Zugang zum legalen Wohn- und Arbeitsmarkt zu erlangen, gegebenenfalls auch erst nach einem längeren Zeitraum von mehreren Monaten oder sogar Jahren? Falls dies nicht der Fall sein sollte, benennen Sie bitte anhand Ihnen bekannter (repräsentativer) Fälle die Gründe hierfür.

16. Sind Ihnen Fälle von sexueller Ausbeutung und/oder Übergriffen (sexualisiert, gewalttätig o.ä.) auf internationale Schutzberechtigte in Griechenland bekannt, insbesondere im Zusammenhang mit der Unterkunfts- und Arbeitssituation? Wenn ja: Können Sie Angaben zur Häufigkeit solcher Umstände machen? Können Angaben dazu gemacht werden, ob und ggf. welche Frauen besonders gefährdet sind?

17. Der Vorsitzende weist im Übrigen darauf hin, dass das Gericht mit Beschluss vom 26. September 2025 eine amtliche Auskunft beim Auswärtigen Amt angefordert hat hinsichtlich der Fragen, (1) ob und ggf. in welchem Umfang in Griechenland für international Schutzberechtigte Unterkünfte oder Notschlafstellen, die von kommunalen Trägern oder nichtstaatlichen Hilfsorganisationen betrieben werden, verfügbar sind, sowie (2) ob international Schutzberechtigte (realistischerweise) das Programm „Wohnen und Arbeiten für Obdachlose“ in Anspruch nehmen können. Der diesbezügliche Beweisbeschluss ist diesem Schreiben beigelegt. Sollten Sie sich in der Lage sehen, zu den darin gestellten Fragen ebenfalls, ggf. auch nur teilweise, Stellung zu nehmen, wird angeregt, dies zu tun.

18. Selbstverständlich können Sie sich bei der Beantwortung der Fragen durch andere Stellen und Nichtregierungsorganisationen unterstützen lassen. Eine Einbeziehung anderer Stellen und Nichtregierungsorganisationen, die qualifizierten Auskünfte geben können, liegt im hiesigen Interesse, um eine möglichst aussagekräftige Beantwortung der Fragen zu erhalten. Es sollte insoweit jedoch stets ersichtlich sein, von wem welche Auskunft stammt.

Aufgrund der teilweisen Überschneidung der einzelnen Fragen steht es Ihnen selbstverständlich auch frei, mehrere Fragen zusammenfassend zu beantworten oder bei der Beantwortung einzelner Fragen auf die Beantwortung anderer Fragen zu verweisen.

19. Ein ähnlicher Fragenkatalog wird an [REDACTED] gesandt. Es steht Ihnen frei, auch eine gemeinsame Stellungnahme zu verfassen oder sich miteinander abzustimmen.

Für Ihre Bereitschaft, Auskunft zu geben, wird ausdrücklich gedankt!

Vorsorglich wird darauf hingewiesen, dass Ihre Auskunft in einem gerichtlichen Verfahren nur verwertet werden kann, wenn sie den Verfahrensbeteiligten zur Verfügung gestellt wird. Zudem müssen Sie damit rechnen, dass Ihre Auskunft allgemein veröffentlicht wird, da sie nur so von allen Verwaltungsgerichten in Deutschland genutzt werden kann. Es wird von Ihrem Einverständnis ausgegangen.

Mit freundlichen Grüßen

A solid black rectangular box used to redact the signature of the presiding judge.

Vorsitzender Richter am Verwaltungsgericht

English translation:

Administrative Court of Hamburg
12th Chamber

Administrative Court of Hamburg, Lübeckertordamm 4, 20099 Hamburg

Naomi Thessaloniki
Ecumenical Workshop for Refugees
Ptolemaion 29A
54630 Thessaloniki

Extension

Date

4 December 2025

Dear Ms Vakalis,

The 12th Chamber of the Administrative Court of Hamburg is, among other things, responsible for actions challenging decisions of the Federal Office for Migration and Refugees (Federal Office) in which the Federal Office has rejected an asylum application as inadmissible pursuant to Section 29(1) no. 2 of the Asylum Act, because another EU Member State, namely Greece, has already granted international protection (refugee protection or subsidiary protection). However, an asylum applicant cannot be required to rely on the international protection granted by Greece if he or she faces inhuman or degrading treatment in Greece within the meaning of Article 4 of the Charter of Fundamental Rights of the European Union (CFR).

While the Federal Administrative Court has already held that young, healthy and single men who have been granted international protection in Greece do not, in principle, face living conditions incompatible with Article 4 CFR upon return to Greece (Federal Administrative Court, judgment of 16 April 2025, 1 C 18.24, juris), the Federal Administrative Court has not yet addressed the situation of women who have been granted international protection in Greece. For this reason, first-instance case law is currently divided as to whether the women in question face living conditions incompatible with Article 4 CFR upon return to Greece. In proceedings for interim relief, the 12th Chamber of the Administrative Court of Hamburg has so far prevented removal measures and justified this on the ground that it cannot simply be assumed that, for beneficiaries of international protection returning to Greece, female gender is not associated with a significant increase in the risk of living conditions incompatible with Article 4 CFR. In particular, the Chamber has raised the question whether women can be referred to the same accommodation and employment opportunities as men.

The present inquiry serves the further clarification of the facts and, notwithstanding the Federal Administrative Court's existing judgment on the situation of male beneficiaries of international protection in Greece, concerns the situation of both male and female beneficiaries of international protection in Greece. In view of the fact that the situation of female beneficiaries of international protection in Greece is currently a focus of German administrative court case law, it is requested, however, that the answers to the questions distinguish, as far as possible, between male and female beneficiaries of international protection and, where appropriate, explain to what extent gender-specific circumstances play a role.

1. Please begin by briefly describing your work and expertise, as well as that of NAOMI Thessaloniki (hereinafter: NAOMI), in the field of support for refugees in Greece.

2. Please describe, if possible, all cases known to you from your own direct experience of beneficiaries of international protection who have returned or been deported to Greece from other EU countries in the last two years. The description should include the following points:

- age, gender, marital status, nationality, any illnesses or disabilities, date of return;
- the country from which the person concerned returned or was deported;
- the situation in Greece after return, particularly with regard to accommodation and employment;
- any particular difficulties or problems with which the person concerned was confronted.

3. How many beneficiaries of international protection did you support in 2025, in particular (a) with accommodation, (b) in searching for accommodation, or (c) in obtaining the documents, bank account, etc. required to facilitate access to the formal housing and labour market?

Please describe your experience in supporting beneficiaries of international protection in obtaining the documents required for access to legal work and legally rented accommodation (tax identification number, social security number, bank account, etc.).

Are there cases of beneficiaries of international protection whom you did not support in 2025 despite a request for assistance? If so, how many cases were there, what form of assistance was requested, and why could it not be provided?

4. Is there a possibility in Greece for beneficiaries of international protection returning from other EU countries to return to the reception facilities intended for asylum seekers and to be accommodated there, if necessary also informally (on a tolerated basis)? Are you aware of any such cases from the last two years?

Note: The Court is aware that persons who have been granted international protection must immediately leave the accommodation assigned to them during the pending asylum procedure. However, there have in the past been (isolated) reports that beneficiaries of international protection returning from abroad have returned to such accommodation. The Swiss Federal Administrative Court even proceeds on the general assumption that beneficiaries of international protection can request (extraordinary) accommodation in accommodation for asylum seekers after their return (cf. Swiss Federal Administrative Court, judgment of 11 September 2025, D-2590/2025).

5. Is there a realistic prospect in Greece for beneficiaries of international protection, in particular those who have returned from other EU countries, of being accommodated in homeless shelters operated by municipal or other state bodies? Are you aware of any such cases from the last two years? To what extent are places available in such shelters in Greece? If, in your view, such a prospect does not exist, please state the reasons for this.

Note: The Federal Administrative Court has so far assumed that, in the event of return to Greece, beneficiaries of international protection can find accommodation or emergency overnight accommodation operated by municipal bodies or non-governmental aid organisations (even if only temporarily or in changing locations), with a minimum level of accessible sanitary facilities (cf. Federal Administrative Court, judgment of 16 April 2025, 1 C 18.24, juris para. 43). The 12th Chamber of the Administrative Court of Hamburg has not yet adopted this assessment (cf. Administrative Court of Hamburg, judgment of 21 July 2025, 12 A 4453/25, juris paras. 46 et seq.) and has requested information from the Federal Foreign Office on this issue in order to clarify this question (cf. Administrative Court of Hamburg, order of 26 September 2025, 12 A 7005/25, juris).

6. Is there a realistic prospect in Greece for beneficiaries of international protection, in particular those who have returned from other EU countries, of being accommodated in shelters or emergency accommodation operated or provided by non-state actors (non-governmental organisations, charitable and other private or church-based institutions)? Are you aware of any such cases from the last two years? To what extent are such shelters and emergency accommodation available in Greece? Does NAOMI offer such shelters or emergency accommodation? If, in your view, such a prospect does not exist, please state the reasons for this.

Please also see the note to question 5 in this regard. On your website (<https://naomi.gr/projekte/nothilfe-fur-fluchtlinge/>), you state, among other things, that NAOMI can provide rapid and unbureaucratic assistance, including with accommodation, and that families are also supported with subsidies for rent and ancillary rental costs.

7. Is there a realistic prospect in Greece for beneficiaries of international protection, including in particular those who have returned from other EU countries, of legally renting an apartment? Are you aware of any such cases from the last two years? If, in your view, such a prospect does not exist, please state the reasons for this.

8. Where and in what way do beneficiaries of international protection who cannot be accommodated either in accommodation for asylum seekers or in homeless shelters, and who also cannot legally rent an apartment, find accommodation or at least a place to sleep? What type of accommodation or sleeping place is involved? What findings do you have regarding the living conditions in such accommodation (in particular regarding the size of the accommodation, the number of persons accommodated, the availability of sanitary facilities in the accommodation or other accessible washing facilities, the general hygienic conditions, and possibilities for women to withdraw to a safe or private space)? Are these forms of accommodation and places to sleep available to men and women to the same extent? If this is not the case, please state the reasons for this.

Note: The 12th Chamber of the Administrative Court currently assumes that, in any event, non-vulnerable male beneficiaries of international protection (can) find places to sleep - in particular through migrant networks and non-state actors - e.g. in informally (sub)let apartments, makeshift accommodation, state-tolerated informal settlements or other very basic makeshift camps, e.g. near agricultural businesses (cf. Administrative Court of Hamburg, judgment of 21 July 2025, 12 A 4453/25, juris paras. 57 et seq., 93). The Administrative Court of Cottbus recently held that such places to sleep can, in principle, also reasonably be expected of women and that, in particular, there is no sufficient evidence that women there face a considerable risk of sexual assaults (cf. Administrative Court of Cottbus, order of 20 November 2025, 5 L 599/25.A, juris para. 30).

9. Are you aware of cases from the last two years in which beneficiaries of international protection, including in particular those who have returned from other EU countries, were homeless, meaning that they were forced to sleep outdoors, for example on the street or on a park bench? If so, how long did this situation last (in each case)? In your assessment, were these isolated cases or is this a more frequently occurring phenomenon? Please state the reasons for your assessment.

Note: The 12th Chamber of the Administrative Court currently has no reliable statistics on the proportion and absolute number of beneficiaries of international protection who are homeless. On your website (<https://naomi.gr/projekte/nothilfe-fur-fluchtlinge/>), you state, among other things, that NAOMI has repeatedly provided material assistance to refugees living on the street, in unfinished buildings, under bridges and in parks.

10. Is there a realistic prospect in Greece for beneficiaries of international protection, in particular those who have returned from other EU countries, of taking up legal employment (meaning employment in which labour, social security and tax law provisions are in principle complied with)? Are you aware of any such cases from the last two years? If, in your view, such a prospect does not exist, please state the reasons for this.

11. Is there a realistic prospect in Greece for beneficiaries of international protection, including in particular those who have returned from other EU countries, of taking up irregular employment (“undeclared work”, “informal economy”)? Are you aware of any such cases from the last two years? If, in your view, such a prospect does not exist, please state the reasons for this.

Note: In German case law, returning beneficiaries of international protection are regularly referred to employment in the informal economy, particularly in construction, agriculture, tourism and hospitality. The 12th Chamber of the Administrative Court of Hamburg also currently assumes that, in any event, male beneficiaries of international protection can find and take up employment in the informal economy.

In which sectors is it possible to perform work without, or with only very rudimentary, knowledge of the Greek language? Where such a possibility exists, are at least rudimentary knowledge of English or of another specific language required? Do such possibilities exist in construction, agriculture, tourism and hospitality (e.g. as a cleaner or dishwasher, possibly under the supervision of persons from the same country of origin who speak Greek or another specific language)?

Note: The 12th Chamber of the Administrative Court of Hamburg assumes that there are a number of jobs, particularly in construction and agriculture, that can also be performed with (only) rudimentary knowledge of Greek or at least of English. The Chamber currently has no precise knowledge of the extent to which language skills are required in other sectors, particularly tourism and hospitality or in the commercial sector (e.g. as a sewing worker or tailor).

To what extent do the opportunities for women and men to take up employment differ? Are there particular disadvantages for women?

Note: In interim relief proceedings, the 12th Chamber of the Administrative Court of Hamburg raised the question whether employment opportunities in the informal economy, particularly in construction and agriculture, are in fact available to women to the same extent as to men (cf. Administrative Court of Hamburg, order of 5 March 2025, 12 AE 1165/25, juris para. 7). Other courts, by contrast, see no reason why employment opportunities in the informal economy - with the exception of employment opportunities in construction - should not be available to women to the same extent as to men (cf. Administrative Court of Cottbus, order of 20 November 2025, 5 L 599/25.A, juris paras. 23 et seq.).

12. Please describe, if known to you and, where possible, on the basis of specific (individual) cases known to you, the working conditions in the informal economy, in particular with regard to the following aspects:

- range of remuneration
- working hours
- provision of accommodation in the context of work (e.g. as a harvest worker on an agricultural farm)
- seasonality / fluctuations in the availability of work opportunities.

In this regard, please also describe the difficulties with which beneficiaries of international protection working in the informal economy are most frequently or most severely confronted. Do women face particular challenges in this respect?

Note: In line with the case law of the Federal Administrative Court, the 12th Chamber of the Administrative Court of Hamburg assumes that the mere fact that employment takes place in the informal economy does not in itself constitute inhuman or degrading treatment within the meaning of Article 4 CFR, provided that this employment is not subject to sanctions for the beneficiary of international protection as an employee, or that sanctions are in any event not actually imposed on them (cf. Federal Administrative Court, judgment of 16 April 2025, 1 C 18.24, juris para. 45). Accordingly, inhuman or degrading treatment would appear conceivable only, if at all, on the basis of the working conditions in the informal economy.

13. Please state to what extent beneficiaries of international protection, including in particular those returning from other EU countries, can realistically expect to receive support from the HELIOS+ project in obtaining accommodation and employment. Are you aware of any such cases? Please state the reasons for your assessment.

Note: The Federal Administrative Court also refers returning beneficiaries of international protection who were granted protection no more than 20 months before their return to Greece to the HELIOS+ programme (cf. Federal Administrative Court, judgment of 16 April 2025, 1 C 18.24, juris para. 29). The 12th Chamber of the Administrative Court of Hamburg, by contrast, has so far assumed that it is unlikely that returning beneficiaries of international protection can make use of HELIOS+ services (cf. Administrative Court of Hamburg, judgment of 21 July 2025, 12 A 4453/25, juris para. 43).

14. Please state to what extent beneficiaries of international protection, including in particular those returning from other EU countries, can realistically expect to receive support from the programme "Housing and Work for the Homeless" in obtaining accommodation and employment. Are you aware of any such cases from the last two years? Please state the reasons for your assessment.

Note: The Federal Administrative Court also refers returning beneficiaries of international protection to the programme "Housing and Work for the Homeless", which is intended to provide, among other things, rent and employment subsidies (cf. Federal Administrative Court, judgment of 16 April 2025, 1 C 18.24, juris para. 41). The 12th Chamber of the Administrative Court of Hamburg has raised the question whether this programme is actually (realistically) available to returning beneficiaries of international protection and has requested information from the Federal Foreign Office in this regard (see no. 17).

15. Based on your experience from your counselling practice, is it possible, starting from initially informal living and working conditions (without a registered address and legal employment), to obtain the documents required for access to legally rented accommodation and legal employment, even if only after a longer period of several months or even years? If this is not the case, please state the reasons for this on the basis of (representative) cases known to you.

16. Are you aware of cases of sexual exploitation and/or assaults (sexualised, violent or otherwise) against beneficiaries of international protection in Greece, in particular in connection with their accommodation and employment situation? If so, can you provide information on the frequency of such cases? Can you provide information on whether women are particularly at risk and, if so, which groups of women?

17. The Presiding Judge also notes that, by order of 26 September 2025, the Court requested official information from the Federal Foreign Office concerning the questions (1) whether, and if so to what extent, accommodation or emergency accommodation operated by municipal bodies or non-governmental aid organisations are available in Greece for beneficiaries of international protection, and (2) whether beneficiaries of international protection can (realistically) make use of the programme “Housing and Work for the Homeless”. The corresponding order for the taking of evidence is attached to this letter. Should you consider yourself able to comment on the questions raised therein as well, even if only in part, you are encouraged to do so.

18. Of course, you may seek support from other institutions and non-governmental organisations in answering the questions. The involvement of other institutions and non-governmental organisations that can provide qualified information is in the interest of the Court, in order to obtain answers to the questions that are as informative as possible. In this respect, however, it should always be clear from whom each item of information originates.

Due to the partial overlap between the individual questions, you are of course also free to answer several questions together or, when answering individual questions, to refer to the answers to other questions.

19. A similar catalogue of questions will be sent to [REDACTED] ([REDACTED]). You are free also to prepare a joint statement or to coordinate with one another.

We expressly thank you for your willingness to provide information.

As a precaution, it is pointed out that your information can only be used in court proceedings if it is made available to the parties to the proceedings. In addition, you should expect that your information may be made publicly available, as this is the only way it can be used by all administrative courts in Germany. Your consent is assumed.

Yours sincerely,

[REDACTED]

Presiding Judge at the Administrative Court

Annex 3: Overview of the Organisations Involved in the Research

The following provides a brief overview of each organisation that was interviewed in the course of the research or provided data and statistical information, and describes its relevance to the research.

Action for Women (AFW): AFW is a women's rights organisation based in Athens with an all-female team that supports asylum-seeking women and female beneficiaries of international protection, particularly with stabilisation and reintegration. A focus of its work is on women in vulnerable situations, especially supporting survivors of gender-based violence.

Choosehumanity: Choosehumanity operates an apartment in Athens for particularly vulnerable persons affected by displacement and supports homeless or otherwise particularly vulnerable beneficiaries of international protection with concrete assistance.

CRIBS International (Cribs): Cribs operates a housing project in Athens for women in advanced pregnancy and mothers with newborn children who have fled conflict or exploitation. In addition to providing accommodation, the support includes monthly financial assistance and comprehensive case management. Before they move out of the housing project, the organisation also supports the mothers in gaining access to independent housing and the labour market.

Pope John XXIII Community in Athens: The Pope John XXIII Community is active in Greece as a religious community. In Athens, it operates the "Casa Famiglia" facility in the Neos Kosmos district, which is aimed at particularly vulnerable persons, including people affected by displacement. In addition to accommodation, the facility also provides basic support services, such as legal, health, educational and food assistance.

International Social Service - Switzerland (ISS): ISS works through a network of partners in 120 countries to promote the rights of children, families and persons affected by displacement, and supports them in transnational contexts through social, legal and specialist assistance. In the Athens area, ISS provides support for returnees from Switzerland and therefore has practical insights into the situation of this group after return to Greece.

Love without Borders (LWB): LWB previously operated several larger housing projects, which currently cannot be continued due to a lack of funding. However, the organisation remains well connected and supports, in particular, homeless beneficiaries of international protection or those threatened with homelessness in their search for accommodation.

Mazi Housing (Mazi): Mazi is a housing project in Athens for young, single men affected by displacement. In addition to food and hygiene products, residents receive support in accessing education, finding employment and building social networks.

Medical Solidarity International (MSI): Medical Solidarity International is a medical organisation that supports people affected by displacement in Greece and has extensive experience regarding access to the public healthcare system. Through its work, MSI has detailed insights into the actual conditions of access to medical care, particularly for beneficiaries of international protection and asylum seekers.

Meraki Humanitarian Support (Meraki): Meraki operates a social support and orientation service in Greece for people affected by displacement and persons in vulnerable situations. The organisation provides support, among other things, with bureaucratic procedures, the search for safe housing, and access to psychological, medical and legal support. At the same time, it accompanies people in precarious living situations in navigating the Greek system. In the course of its work, Meraki supported

numerous returnees over the past year and therefore has particularly concrete insights into their living conditions and everyday challenges.

Mobile Info Team: Mobile Info Team supports people affected by displacement in Greece in navigating complex legal procedures. The organisation provides accessible information through digital helplines and offers individual legal support and case-related counselling. On the basis of its practical work, Mobile Info Team also advocates for structural improvements in the Greek and European asylum and migration system.

NAOMI – Ecumenical Workshop for Refugees in Thessaloniki (NAOMI): NAOMI provides humanitarian assistance to people affected by displacement and supports their social and professional participation, including through social work, a safe space for girls and women, and textile-sector programmes. Through its social service, NAOMI increasingly supports beneficiaries of international protection in precarious living conditions and returnees.

Refugee Support Aegean (RSA): RSA is a non-profit organisation focusing on strategic litigation in support of people affected by displacement and on the documentation of human rights violations. The organisation has monitored the situation of beneficiaries of international protection and returnees in Greece for several years and has extensive experience regarding the legal and practical conditions and obstacles to integration.

Wave: Wave is a community centre in Thessaloniki and offers a safe space, food and basic services such as laundry facilities for marginalised people. A large proportion of the persons supported are beneficiaries of international protection. Wave has also had contact with several returnees from other European countries, but primarily has insights into the living situation of beneficiaries of international protection living under precarious conditions.

Annex 4: Information Provided by the Department Responsible for Camp Allocations on the Accommodation of Returnees

The following information from the department of the Reception and Identification Service responsible for allocations to reception and accommodation structures was obtained in connection with Chapter 4.

The authority's response relevant to the question is reproduced in the Greek original and in English translation prepared by the author. Personal data, in particular names, personal email addresses and telephone numbers, have been redacted. Functional email addresses of authorities or departments have been retained where they are relevant for contextualising the information provided. Graphic design elements of the original email have not been reproduced.

Greek Original

From: Τμήμα Μετακινήσεων, Επιδόσεων & Εξόδου (Υπηρεσία Υποδοχής & Ταυτοποίησης)
<ris.dpt.tne@migration.gov.gr>

To: Michael Kientzle <[REDACTED]>

Cc: Τμήμα Μετακινήσεων, Επιδόσεων & Εξόδου (Υπηρεσία Υποδοχής & Ταυτοποίησης)
<ris.dpt.tne@migration.gov.gr>

Date: 11.03.2026, 10:14

Subject: Απ: Πρόσβαση σε δομές φιλοξενίας για άτομα που έχουν επιστραφεί στην Ελλάδα μετά τη χορήγηση διεθνούς προστασίας

Αξιότιμε κ. Kientzle,

στις Ελεγχόμενες Δομές Προσωρινής Φιλοξενίας Αιτούντων Άσυλο της Υπηρεσίας Υποδοχής και Ταυτοποίησης **δεν** στεγάζονται πολίτες τρίτων χωρών που έχουν λάβει διεθνή προστασία.

Όσοι πολίτες τρίτων χωρών διαμένουν ήδη στις δομές αυτές και λάβουν διεθνή προστασία, αποχωρούν από αυτές στον καθορισμένο από τον νόμο χρονικό διάστημα.

Παραμένουμε στη διάθεσή σας για περαιτέρω διευκρινίσεις.

Με εκτίμηση,

[REDACTED]
Υπηρεσία Υποδοχής και Ταυτοποίησης
Διεύθυνση Υποστήριξης
Τμήμα Μετακινήσεων, Επιδόσεων και Εξόδου

Υπουργείο Μετανάστευσης και Ασύλου
Λ. Θηβών 196 - 198, Νίκαια – Αγ. Ιωάννης Ρέντης, 18233
Τηλ.: 213 162 [REDACTED]
Email: ris.dpt.tne@migration.gov.gr

English Translation:

From: Department of Transfers, Notifications and Exit (Reception and Identification Service)
<ris.dpt.tne@migration.gov.gr>
To: Michael Kientzle <[REDACTED]>
Cc: Department of Transfers, Notifications and Exit (Reception and Identification Service)
<ris.dpt.tne@migration.gov.gr>

Date: 11.03.2026, 10:14

Subject: Re: Access to accommodation structures for persons returned to Greece after being granted international protection

Dear Mr Kientzle,

Third-country nationals who have been granted international protection are not accommodated in the Controlled Temporary Accommodation Facilities for Asylum Seekers of the Reception and Identification Service.

Third-country nationals who are already residing in these facilities and are granted international protection are required to leave them within the period prescribed by law.

We remain at your disposal for any further clarifications.

Yours sincerely,

[REDACTED]
Reception and Identification Service
Support Directorate
Department of Transfers, Notifications and Exit

Ministry of Migration and Asylum
Leoforos Thivon 196–198, Nikaia–Agios Ioannis Rentis, 18233
Phone: 213 162 [REDACTED]
Email: ris.dpt.tne@migration.gov.gr

Annex 5: Information Provided by the BAMF on the Bridging Programme

This annex reproduces the responses of the Federal Office for Migration and Refugees (BAMF) to a request submitted by the author under the Freedom of Information Act (IFG). They concern the bridging programme for returnees from Germany, which is discussed in more detail in Chapter 15.

The authority's responses relevant to the question are reproduced in the German original and in English translation prepared by the author. Parts of the correspondence that are not relevant have been omitted. Personal data, in particular names, personal email addresses and telephone numbers, have been redacted. Functional email addresses of authorities or departments have been retained where they are relevant for contextualising the information provided. Graphic design elements of the original email have not been reproduced.

German Original:

From: [REDACTED] 11E DUS <[REDACTED]@bamf.bund.de>
To: Michael Kientzle <[REDACTED]>

Date: 27.03.2026, 15:46

Subject: Aw: Re: IFG Antrag Überbrückungsprogramm Rückkehrer Griechenland / Ihre Anfrage nach dem Informationsfreiheitsgesetz vom 11.02.2026 (IFG-1421)

Sehr geehrter Herr Kientzle,

auf Ihren geänderten Antrag vom 11.03.2026 hin erhalten Sie die nachfolgenden Informationen:

Teil 1:

- Zum Unterstützungsprogramm für Rückkehrende mit Schutzstatus in Griechenland (Überbrückungsprojekt im Kontext von HELIOS+) für den Zeitraum seit Beginn des Programms (nach Kenntnisstand: Januar 2025) bis zum heutigen Datum:
 - 1.) Angaben zum Beginn und zur Laufzeit des Unterstützungsprogramm: Bitte teilen Sie mit: das offizielle Startdatum, die vorgesehene Laufzeit, ob und ggf. auf welcher Grundlage das Programm verlängert wurde oder wird.
Antwort BAMF: Das Überbrückungsprojekt (ÜBP) wird seit dem 01.02.2025 umgesetzt und hat aktuell eine Laufzeit von 18 Monaten. Zu einer möglichen Verlängerung durch die Europäische Kommission (EU-KOM) und Griechenland (GRC) oder eine eigenständige Weiterführung durch GRC gibt es derzeit noch keine Festlegung.
 - 2.) Falls relevant: Informationen oder Mitteilungen, die dem BAMF zur eigenständigen Weiterführung des Programms durch Griechenland nach Ablauf der ersten Projektphase vorliegen.
Antwort BAMF: Hierzu liegen dem BAMF aktuell keine Informationen vor.
- Zum Vorgehen des BAMF in Asylfällen von Schutzberechtigten mit Schutzanerkennung durch Griechenland:
 - 3.) Ich bitte Sie um sämtliche Dokumente (insbesondere Rundschreiben, Dienstanweisungen etc.) zum Vorgehen in Asylfällen von Schutzberechtigten mit Schutzanerkennung durch Griechenland seit dem 24.09.2025.
Antwort BAMF: Vgl. Anlage in dieser E-Mail.

Teil 2:

- Zum Unterstützungsprogramm für Rückkehrende mit Schutzstatus in Griechenland (Überbrückungsprojekt im Kontext von HELIOS+) für den Zeitraum seit Beginn des Programms (nach Kenntnisstand: Januar 2025) bis zum heutigen Datum:
 - 1.) Anzahl der Personen, die seit Programmstart Leistungen erhalten haben
Antwort BAMF: Bis zum 26.03.2026 wurden 54 Personen in das Überbrückungsprogramm (im Nachfolgenden: ÜBP) aufgenommen und haben die vorgesehene Grundversorgung erhalten bzw. nehmen derzeit am Projekt teil und erhalten die vorgesehene Versorgung.

Anzahl der Personen, die im Anschluss an das Unterstützungsprogramm in HELIOS+ aufgenommen wurden

Falls Personen nach Teilnahme am Überbrückungsprogramm nicht in Helios+ aufgenommen wurden, dokumentierten Gründe, aus denen eine Aufnahme in HELIOS+ nicht erfolgte.

Antwort BAMF: Nach Kenntnis des Bundesamts wurden hiervon 18 Personen anschließend in das GRC Integrationsprogramm HELIOS+ aufgenommen (Stand: 26.03.2026). 31 Personen nehmen derzeit noch Leistungen des ÜBP in Anspruch und werden im Anschluss voraussichtlich in HELIOS+ aufgenommen (Stand: 26.03.2026). Während der Teilnahme am Überbrückungsprogramm werden seitens der Internationalen Organisation für Migration (IOM) Vorbereitungen getroffen, um eine möglichst rasche Aufnahme in das HELIOS+-Programm in die Wege zu leiten. Nach Kenntnis des Bundesamts erfolgt lediglich dann keine Aufnahme in HELIOS+, wenn die betreffende Person dies nicht wünscht.

2.) Alle wesentlichen Vereinbarungen, Verwaltungsabsprachen, Memoranden oder sonstige schriftliche Absprachen zwischen dem BAMF bzw. dem BMI und dem griechischen Ministerium für Migration und Asyl sowie/oder der IOM im Zusammenhang mit dem Unterstützungsprogramm.

Antwort BAMF: Die Umsetzung des ÜBP beruht auf einem im April 2025 geschlossenen Vertrag zwischen der EU-KOM und GRC. Dem Bundesamt liegt dieser Vertrag nicht vor. Dem Bundesamt liegt der Entwurf eines Dokuments vor, in dem die Struktur und die operativen Prozesse bezüglich des ÜBP festgelegt werden, sog. „Standard Operational Procedures“ (SOPs). Die SOPs werden derzeit zwischen der GRC Seite und der EU-KOM abgestimmt. Es ist noch nicht absehbar, wann die finalisierte Fassung vorliegen wird.

3.) Soweit vorhanden: Evaluierungen, Monitoringberichte oder interne Lageeinschätzungen zur Umsetzung und Wirksamkeit des Unterstützungsprogramms.

Antwort BAMF: Evaluierungen, Monitoringberichte oder interne Lageeinschätzungen zur Umsetzung des Projekts liegen dem Bundesamt nicht vor.

Mit freundlichen Grüßen,

██████████

Referentin

Referat 11E - Justizariat
Bundesamt Für Migration und Flüchtlinge
Frankenstr. 210, 90461 Nürnberg
Dienstort: Erkrather Str. 377, 40231 Düsseldorf
Tel. 0911-943-██████████
E-Mail: ██████████@bamf.bund.de
Internet: www.bamf.bund.de

English Translation:

From: [REDACTED] 11E DUS <[REDACTED]@bamf.bund.de>
To: Michael Kientzle <[REDACTED]>

Date: 27.03.2026, 15:46

Subject: Aw: Re: IFG Request Bridging Programme for Returnees to Greece / Your Request under the Freedom of Information Act of 11 February 2026 (IFG-1421)

Dear Mr Kientzle,

in response to your amended request of 11 March 2026, you are receiving the following information:

Part 1:

- Regarding the support programme for returnees with protection status in Greece (bridging project in the context of HELIOS+) for the period since the beginning of the programme (to our knowledge: January 2025) up to today's date:
 - 1.) Information on the start and duration of the support programme: Please provide the official start date, the planned duration, and whether and, if so, on what basis the programme has been or will be extended.
BAMF response: The bridging project (ÜBP) has been implemented since 1 February 2025 and currently has a duration of 18 months. No decision has yet been made regarding a possible extension by the European Commission (EU COM) and Greece (GRC) or an independent continuation by Greece.
 - 2.) If relevant: information or communications available to the BAMF regarding an independent continuation of the programme by Greece after the end of the first project phase.
BAMF response: The BAMF currently has no information on this.
- Regarding the BAMF's handling of asylum cases of beneficiaries of international protection recognised in Greece:
 - 3.) I request all documents, in particular circulars, service instructions, etc., concerning the handling of asylum cases of beneficiaries of international protection recognised in Greece since 24 September 2025.
BAMF response: See attachment to this email.¹⁵²

Part 2:

- Regarding the support programme for returnees with protection status in Greece (bridging project in the context of HELIOS+) for the period since the beginning of the programme (to our knowledge: January 2025) up to today's date:
 - 1.) Number of persons who have received support since the start of the programme
BAMF response: As of 26 March 2026, 54 persons had been admitted to the bridging programme (hereinafter: ÜBP) and had either received the basic support provided or were, at that time, still participating in the project and receiving the support provided.

Number of persons who were admitted to HELIOS+ following the support programme
If persons were not admitted to HELIOS+ after participation in the bridging programme,

¹⁵² Attached to the email was the BAMF circular of 24 September 2025, "Resumption of decision-making in cases of persons with international protection status in Greece".

documented reasons why admission to HELIOS+ did not take place.

BAMF response: According to the Federal Office's information, 18 of these persons were subsequently admitted to the Greek integration programme HELIOS+ (as of 26 March 2026). 31 persons are currently still receiving support under the ÜBP and are expected to be admitted to HELIOS+ afterwards (as of 26 March 2026). During participation in the bridging programme, the International Organization for Migration (IOM) makes preparations to initiate admission to the HELIOS+ programme as quickly as possible. According to the Federal Office's information, the only reason why persons are not admitted to HELIOS+ is that they do not wish to be admitted.

2.) All essential agreements, administrative arrangements, memoranda or other written arrangements between the BAMF or the Federal Ministry of the Interior and the Greek Ministry of Migration and Asylum and/or IOM in connection with the support programme.

BAMF response: Implementation of the ÜBP is based on a contract concluded in April 2025 between the European Commission and Greece. The Federal Office does not have this contract. The BAMF has a draft document setting out the structure and operational processes regarding the ÜBP, so-called "Standard Operational Procedures" (SOPs). The SOPs are currently being coordinated between the Greek side and the European Commission. It is not yet foreseeable when the finalised version will be available.

3.) Where available: evaluations, monitoring reports or internal situation assessments on the implementation and effectiveness of the support programme.

BAMF response: The Federal Office does not have any evaluations, monitoring reports or internal situation assessments on the implementation of the project.

Yours sincerely,

████████████████████

Policy Officer

Division 11E - Legal Affairs
Federal Office for Migration and Refugees
Frankenstr. 210, 90461 Nuremberg
Office location: Erkrather Str. 377, 40231 Düsseldorf
Tel. 0911-943-██████████
Email: ██████████@bamf.bund.de
Website: www.bamf.bund.de

German Original:

From: [REDACTED] 11E DUS <[REDACTED]@bamf.bund.de>
To: Michael Kientzle <[REDACTED]>

Date: 13.04.2026, 09:18

Subject: Aw: Re: Re: IFG Antrag Überbrückungsprogramm Rückkehrer Griechenland / Ihre Anfrage nach dem Informationsfreiheitsgesetz vom 11.02.2026 (IFG-1421)

Sehr geehrter Herr Kientzle,

auf Ihre Nachfragen hin, kann ich Ihnen folgende Informationen übermitteln:

1. Liegen dem BAMF Informationen darüber vor, warum das SOP 14 Monate nach Beginn des Programms und vier Monate vor dessen Abschluss noch nicht fertiggestellt wurde und zudem kein Termin für die Fertigstellung benannt werden kann?

Antwort: Die Erarbeitung der SOPs beruht auf komplexen Abstimmungsprozessen zwischen der Internationalen Organisation für Migration in Griechenland (IOM GRC), dem GRC Ministerium für Migration und Asyl (MoMA), der Europäischen Kommission (EU-KOM), dem Bundesministerium des Innern (BMI) und dem Bundesamt für Migration und Flüchtlinge (BAMF). Zum aktuellen Zeitpunkt liegt die Zustimmung seitens GRC zur Freigabe der finalisierten Fassung der SOPs noch nicht vor.

2. Liegen dem BAMF Informationen darüber vor, bis wann Anspruchsberechtigte einen Antrag auf Aufnahme in das Überbrückungsprogramm stellen können? Ist dies bis zum Projektende (18 Monate nach dem 01.02.2025, also wahrscheinlich am 31.07.2026) möglich, oder ist hierfür ein früherer Stichtag vorgesehen?

Antwort: Anspruchsberechtigte Personen können bis auf Weiteres in das Überbrückungsprojekt aufgenommen werden. Da dem BAMF zu einer möglichen Verlängerung des Projektes durch die EU-KOM und GRC oder einer eigenständigen Weiterführung durch GRC derzeit noch keine näheren Informationen bekannt sind, ist es noch nicht möglich, hierfür einen konkreten Stichtag festzulegen.

Mit freundlichen Grüßen,

[REDACTED]

Referentin

Referat 11E - Justizariat
Bundesamt Für Migration und Flüchtlinge
Frankenstr. 210, 90461 Nürnberg
Dienstort: Erkrather Str. 377, 40231 Düsseldorf
Tel. 0911-943-[REDACTED]
E-Mail: [REDACTED]@bamf.bund.de
Internet: www.bamf.bund.de

English Translation:

From: [REDACTED] 11E DUS <[REDACTED]@bamf.bund.de>
To: Michael Kientzle <[REDACTED]>

Date: 13.04.2026, 09:18

Subject: Aw: Re: Re: IFG Request Bridging Programme for Returnees to Greece / Your Request under the Freedom of Information Act of 11 February 2026 (IFG-1421)

Dear Mr Kientzle,

In response to your follow-up questions, I can provide you with the following information:

1. Does the BAMF have information on why the SOPs have not yet been finalised 14 months after the start of the programme and four months before its conclusion, and why no date can be given for their finalisation?

Response: The preparation of the SOPs is based on complex coordination processes between the International Organization for Migration in Greece (IOM Greece), the Greek Ministry of Migration and Asylum (MoMA), the European Commission (EU COM), the Federal Ministry of the Interior (BMI) and the Federal Office for Migration and Refugees (BAMF). At present, approval by Greece for the release of the finalised version of the SOPs has not yet been given.

2. Does the BAMF have information on the date by which eligible persons can apply for admission to the bridging programme? Is this possible until the end of the project (18 months after 1 February 2025, therefore presumably on 31 July 2026), or is an earlier cut-off date envisaged?

Response: Eligible persons can continue to be admitted to the bridging project until further notice. Since the BAMF currently has no further information on a possible extension of the project by the European Commission and Greece or on an independent continuation by Greece, it is not yet possible to set a specific cut-off date for this.

Yours sincerely,

[REDACTED]

Policy Officer

Division 11E - Legal Affairs
Federal Office for Migration and Refugees
Frankenstr. 210, 90461 Nuremberg
Office location: Erkrather Str. 377, 40231 Düsseldorf
Tel. 0911-943-[REDACTED]
Email: [REDACTED]@bamf.bund.de
Website: www.bamf.bund.de

Annex 6: Information Provided by OPEKA on the “Housing and Work for the Homeless” Programme

In the course of the research on the programme “Housing and Work for the Homeless”, which is discussed in Chapter 16, the following information was obtained from OPEKA. The authority’s responses relevant to this report are reproduced in the Greek original and in English translation prepared by the author.

Personal data, in particular names, personal email addresses and telephone numbers, have been redacted. Functional email addresses of authorities or departments have been retained where they are relevant for contextualising the information provided.

Greek Original:

From: [REDACTED] <[REDACTED]@da-opeka.gr>
To: Michael Kientzle <[REDACTED]>
Cc: [REDACTED] <[REDACTED]@da-opeka.gr>

Date: 03.04.2026, 16:39

Subject: RE: Αίτημα παροχής πληροφοριών για το πρόγραμμα «Στέγαση και Εργασία για αστέγους III»

Αγαπητέ κ. Kientzle

Οι όροι και προϋποθέσεις του προγράμματος ορίζονται με την υπ’ αριθ. 1301/12-8-2024 ΚΥΑ «Καθορισμός των όρων και των προϋποθέσεων υλοποίησης του προγράμματος με τίτλο “Στέγαση και Εργασία για τους αστέγους”» (ΦΕΚ τ. Β’ 4766/20.08.2024), όπως τροποποιήθηκε με την υπ’ αριθ. 8181/24-12-2024 ΚΥΑ «Τροποποίηση της υπ’ αριθ. 1301/12-8-2024 κοινής υπουργικής απόφασης με θέμα «Καθορισμός των όρων και των προϋποθέσεων υλοποίησης του προγράμματος με τίτλο «Στέγαση και Εργασία για τους αστέγους» (Β’ 4766)» (ΦΕΚ τ. Β’ 118/27.12.2024).

Στο άρθρ. 3. της ανωτέρω ΚΥΑ ωφελούμενοι του προγράμματος ορίζονται οι ακόλουθες κατηγορίες:

- α. Οικογένειες και άτομα που φιλοξενούνται σε Ξενώνες Μεταβατικής Φιλοξενίας Αστέγων και Υπνωτήρια.
- β. Οικογένειες και άτομα που έχουν καταγραφεί από τις Κοινωνικές Υπηρεσίες των Δήμων ως άστεγοι που διαβιούν στο δρόμο ή σε ακατάλληλα καταλύματα ή σε επισφαλείς συνθήκες στέγασης. Επισφαλείς συνθήκες στέγασης για τους σκοπούς της παρούσας, συνιστούν ιδίως, η διαμονή υπό απειλή έξωσης, η διαμονή σε καθεστώς παράτυπης ενοικίασης ή παραχώρησης, η διαμονή στην οικογενειακή εστία υπό την απειλή βίας ή αναγκαστικής απομάκρυνσης, η προσωρινή διαμονή σε συγγενείς ή φίλους από ανάγκη ευάλωτων οικογενειών και ατόμων, σύμφωνα με την Ευρωπαϊκή Τυπολογία για την έλλειψη στέγης και τον αποκλεισμό από την κατοικία (ETHOS).
- γ. Γυναίκες που φιλοξενούνται σε Ξενώνες Γυναικών θυμάτων βίας και δεν έχουν πρόσβαση σε κατοικία.
- δ. Άτομα που φιλοξενούνται σε Ξενώνες Προσωρινής Φιλοξενίας Μονάδων Κοινωνικής Επανάταξης Πιστοποιημένων Θεραπευτικών Προγραμμάτων Εξαρτημένων Ατόμων Φορέων του ν. 4139/2013 (Α’ 74) και δεν έχουν πρόσβαση σε κατοικία.
- ε. Οικογένειες και άτομα που διαβιούν σε δωρεάν παραχωρημένη οικία από φορέα Γενικής Κυβέρνησης, όπως αυτή ορίζεται στην περ. β’ της παρ. 1 του άρθρου 14 του ν. 4270/2014 (Α’ 143).

2. Για την ένταξη ωφελουμένων της περ. δ της παρ. 1 του παρόντος, καθώς και ωφελούμενων αστέγων των υπόλοιπων κατηγοριών, οι οποίοι έχουν ήδη ενταχθεί σε θεραπευτικά προγράμματα και βρίσκονται σε στάδιο κοινωνικής επανένταξης, σε σχέδια που υποβάλλουν φορείς των περ. α και β της παρ. 2 του άρθρου 2, απαιτείται η προηγούμενη σύναψη συμφωνητικού συνεργασίας μεταξύ του Δικαιούχου Φορέα, του Διαχειριστή Φορέα και του υπεύθυνου για την υλοποίηση των θεραπευτικών προγραμμάτων φορέα, με το οποίο καθορίζεται ιδίως η κατανομή των αρμοδιοτήτων αναφορικά με τις διαδικασίες ένταξης ωφελούμενων στο πρόγραμμα και παροχής υπηρεσιών ψυχοκοινωνικής στήριξης.

Σας ενημερώνουμε επίσης, ότι οι αιτούντες διεθνή προστασία είναι επιλέξιμοι μόνο αν ανήκουν σε κάποια από τις κατηγορίες του άρθρου 3 της ΚΥΑ όπως αυτές αναφέρονται ανωτέρω.

Στο πρόγραμμα που ήδη υλοποιείται οι εγκρίσεις ωφελουμένων έχουν ήδη λάβει χώρα και ο αριθμός είναι συγκεκριμένος, ανά σχέδιο υλοποίησης, συναρτήσει του διαθέσιμου προϋπολογισμού. Συνολικά ανέρχεται σε 1604 ωφελούμενους.

Για την επερχόμενη 2ετία θα ανοίξει νέος κύκλος αλλά δεν γνωρίζουμε τι προϋπολογισμός θα διατεθεί για τη στήριξη της ευάλωτης αυτής κοινωνικής ομάδας και ποιος θα είναι ο αριθμός των ωφελουμένων που θα υποστηριχθεί.

Με εκτίμηση,

████████████████████

Προϊσταμένη Μονάδας Β'- Διαχείριση και Παρακολούθηση Πράξεων
Αναπληρώτρια Προϊσταμένη Μονάδας Γ' – Επιτόπιες Επαληθεύσεις
Διεύθυνση Διαχείρισης Συγχρηματοδοτούμενων και Εθνικών Προγραμμάτων (Διαχειριστική Αρχή)
Οργανισμός Προνοιακών Επιδομάτων & Κοινωνικής Αλληλεγγύης
Κωστή Παλαμά 6-8, 11141 Αθήνα
Τηλ. : 210 212 ██████████
W: <https://opeka.gr/> E: ██████████@da-opeka.gr

English Translation:

From: ██████████ <██████████@da-opeka.gr>
To: Michael Kientzle <██████████>
Cc: ██████████ <██████████@da-opeka.gr>

Date: 03.04.2026, 16:39

Subject: RE: Request for Information on the Programme "Housing and Work for the Homeless III"

Dear Mr Kientzle,

The terms and conditions of the programme are laid down in Joint Ministerial Decision No. 1301/12-8-2024, "Determination of the terms and conditions for the implementation of the programme entitled 'Housing and Work for the Homeless'" (Government Gazette, Series B, No. 4766/20.08.2024), as amended by Joint Ministerial Decision No. 8181/24-12-2024, "Amendment of Joint Ministerial Decision No. 1301/12-8-2024 on 'Determination of the terms and conditions for the implementation of the programme entitled "Housing and Work for the Homeless" (B' 4766)" (Government Gazette, Series B, No. 118/27.12.2024).

Article 3 of the above Joint Ministerial Decision defines the following categories as beneficiaries of the programme:

- a. Families and individuals accommodated in Transitional Accommodation Shelters for Homeless Persons and Night Shelters.
- b. Families and individuals who have been recorded by the Social Services of the Municipalities as homeless persons living on the street, in unsuitable accommodation or in precarious housing conditions. For the purposes of the present decision, precarious housing conditions include, in particular, living under threat of eviction, living under irregular rental or concession arrangements, living in the family home under threat of violence or forced removal, and temporary accommodation with relatives or friends out of necessity by vulnerable families and individuals, in accordance with the European Typology of Homelessness and Housing Exclusion (ETHOS).
- c. Women accommodated in Shelters for Women Victims of Violence who have no access to housing.
- d. Persons accommodated in Temporary Accommodation Shelters of Social Reintegration Units of Certified Treatment Programmes for Persons with Addiction Problems of bodies under Law 4139/2013 (A' 74) who have no access to housing.
- e. Families and individuals living in housing provided free of charge by a public-sector body falling within the General Government, as defined in point b of paragraph 1 of Article 14 of Law 4270/2014 (A' 143).

2. For the inclusion of beneficiaries under point d of paragraph 1 of this Article, as well as homeless beneficiaries of the other categories who have already been included in treatment programmes and are at the stage of social reintegration, in plans submitted by bodies under points a and b of paragraph 2 of Article 2, the prior conclusion of a cooperation agreement is required between the Beneficiary Body, the Managing Body and the body responsible for implementing the treatment programmes. This agreement determines, in particular, the allocation of responsibilities regarding the procedures for including beneficiaries in the programme and providing psychosocial support services.

We also inform you that applicants for international protection are eligible only if they belong to one of the categories of Article 3 of the Joint Ministerial Decision, as set out above.

In the programme currently being implemented, the approval of beneficiaries has already been completed and the number has been fixed for each implementation plan, depending on the available budget. In total, this amounts to 1,604 beneficiaries.

For the forthcoming two-year period, a new cycle will be launched, but we do not know what budget will be made available to support this vulnerable social group or what number of beneficiaries will be supported.

Yours sincerely,

██████████

Head of Unit B – Management and Monitoring of Operations

Deputy Head of Unit C – On-the-Spot Verifications

Directorate for the Management of Co-Funded and National Programmes (Managing Authority)

Organisation for Welfare Benefits and Social Solidarity

6–8 Kosti Palama Street, 11141 Athens

Tel.: 210 212 ██████████

W: <https://opeka.gr/>

E: ██████████@da-opeka.gr

Greek Original:

From: [REDACTED] <[REDACTED]@da-opeka.gr>
To: Michael Kientzle <[REDACTED]>
Cc: [REDACTED] <[REDACTED]@da-opeka.gr>

Date: 25.05.2026, 17:45

Subject: RE: Αίτημα παροχής πληροφοριών για το πρόγραμμα «Στέγαση και Εργασία για αστέγους III»

Αγαπητέ κ. Kientzle,

Σας ενημερώνουμε για τα εξής:

- Στον τρέχοντα κύκλο του Προγράμματος «Στέγαση και Εργασία για τους αστέγους III» οι ωφελούμενοι έχουν ήδη επιλεγεί και μόνο σε περίπτωση αποχώρησης κάποιου, μπορεί να γίνει αντικατάσταση από ήδη υπάρχουσες, στους Φορείς υλοποίησης, λίστες αναμονής.
- Πράγματι, μπορεί ο αριθμός των ωφελούμενων να διαφέρει ανά χρονική περίοδο και ανά κριτήριο υπολογισμού, διότι το Πρόγραμμα είναι δυναμικό και μπορεί ο αριθμός των ωφελούμενων να διαφοροποιείται ανάλογα με τις αποχωρήσεις, απεντάξεις, αντικαταστάσεις κλπ. Π.χ. Ο αριθμός των εγκεκριμένων ωφελούμενων σύμφωνα με την «Απόφαση Έγκρισης σχεδίου» είναι 1.560, ενώ σύμφωνα με την «Έγκριση συμμετοχής ωφελούμενων» είναι 1.630...
- Σύμφωνα με τα μέχρι τώρα στοιχεία, αναφέρονται: 4 Αιτούντες Άσυλο και 55 Πρόσφυγες ή σε Επικουρική προστασία

Με εκτίμηση,

[REDACTED]
Head of Unit B – Management and Monitoring
Deputy Head of Unit A – Programming and Evaluation
Managing Authority of EL/FEAD - Intermediate Management Body of ESF+ S.O. m
Co-financed and National Programs Management Directorate
Organisation for Welfare Benefits and Social Solidarity (OPEKA)
6-8 Kosti Palama str., 11141 Athens, Greece
Tel.: +30 210 212 [REDACTED]
W: <https://opeka.gr/> E: [REDACTED]@da-opeka.gr

English Translation:

From: [REDACTED] <[REDACTED]@da-opeka.gr>
To: Michael Kientzle <[REDACTED]>
Cc: [REDACTED] <[REDACTED]@da-opeka.gr>

Date: 25.05.2026, 17:45

Subject: RE: Request for Information on the Programme "Housing and Work for the Homeless III"

Dear Mr Kientzle,

We inform you of the following:

- In the current cycle of the programme “Housing and Work for the Homeless III”, the beneficiaries have already been selected and a replacement can be made only if one of them leaves the programme, using already existing waiting lists held by the implementing bodies.
- Indeed, the number of beneficiaries may differ depending on the time period and the method of calculation, because the programme is dynamic and the number of beneficiaries may vary depending on departures, removals from the programme, replacements, etc. For example, the number of approved beneficiaries according to the “Plan Approval Decision” is 1,560, while according to the “Approval of Beneficiary Participation” it is 1,630.
- According to the data available to date, the following figures are reported: 4 asylum seekers and 55 persons with refugee status or subsidiary protection.¹⁵³

Yours sincerely,

██████████

Head of Unit B – Management and Monitoring
Deputy Head of Unit A – Programming and Evaluation
Managing Authority of EL/FEAD - Intermediate Management Body of ESF+ S.O. m
Co-financed and National Programs Management Directorate
Organisation for Welfare Benefits and Social Solidarity (OPEKA)
6-8 Kosti Palama str., 11141 Athens, Greece
Tel.: +30 210 212 ██████████
W: <https://opeka.gr/> E: ██████████@da-opeka.gr

Greek Original:

From: ██████████ <██████████@da-opeka.gr>
To: Michael Kientzle <██████████>
Cc: ██████████ <██████████@da-opeka.gr>

Date: 26.05.2026, 12:30

Subject: RE: Αίτημα παροχής πληροφοριών για το πρόγραμμα «Στέγαση και Εργασία για αστέγους III»

Αξιότιμε κε Kientzle

Εκτίμησή μας είναι ότι η Πρόσκληση για την υποβολή αιτήσεων των Δικαιούχων Φορέων (των Φορέων δηλ. που έχουν τη δυνατότητα να υποβάλουν αιτήσεις χρηματοδότησης υλοποίησης σχεδίων), θα δημοσιευτεί αρχές Φθινοπώρου.

Την αποκλειστική αρμοδιότητα για την ένταξη των ωφελούμενων στο πρόγραμμα διατηρεί ο Δικαιούχος Φορέας με την υποβολή όλων των απαραίτητων δικαιολογητικών και εκθέσεων.

██████████

Head of Unit B – Management and Monitoring
Deputy Head of Unit A – Programming and Evaluation
Managing Authority of EL/FEAD - Intermediate Management Body of ESF+ S.O. m

¹⁵³ The information was provided in response to the author's question as to how many of the programme participants a) have refugee status or subsidiary protection and b) are asylum seekers.

Co-financed and National Programs Management Directorate
Organisation for Welfare Benefits and Social Solidarity (OPEKA)
6-8 Kosti Palama str., 11141 Athens, Greece
Tel.: +30 210 212 [REDACTED]
W: <https://opeka.gr/> E: [REDACTED]@da-opeka.gr

English Translation:

From: [REDACTED] <[REDACTED]@da-opeka.gr>
To: Michael Kientzle <[REDACTED]>
Cc: [REDACTED] <[REDACTED]@da-opeka.gr>

Date: 26.05.2026, 12:30

Subject: RE: Request for Information on the Programme “Housing and Work for the Homeless III”

Dear Mr Kientzle,

We estimate that the call for Beneficiary Bodies to submit applications, that is, the bodies that are able to submit funding applications for the implementation of plans, will be published in early autumn.

The Beneficiary Body has exclusive responsibility for the inclusion of beneficiaries in the programme through the submission of all necessary supporting documents and reports.¹⁵⁴

[REDACTED]
Head of Unit B – Management and Monitoring
Deputy Head of Unit A – Programming and Evaluation
Managing Authority of EL/FEAD - Intermediate Management Body of ESF+ S.O. m
Co-financed and National Programs Management Directorate
Organisation for Welfare Benefits and Social Solidarity (OPEKA)
6-8 Kosti Palama str., 11141 Athens, Greece
Tel.: +30 210 212 [REDACTED]
W: <https://opeka.gr/> E: [REDACTED]@da-opeka.gr

¹⁵⁴ The information was provided in response to the author’s question as to when the next programme cycle is expected to begin and from when new persons can be included in the programme.