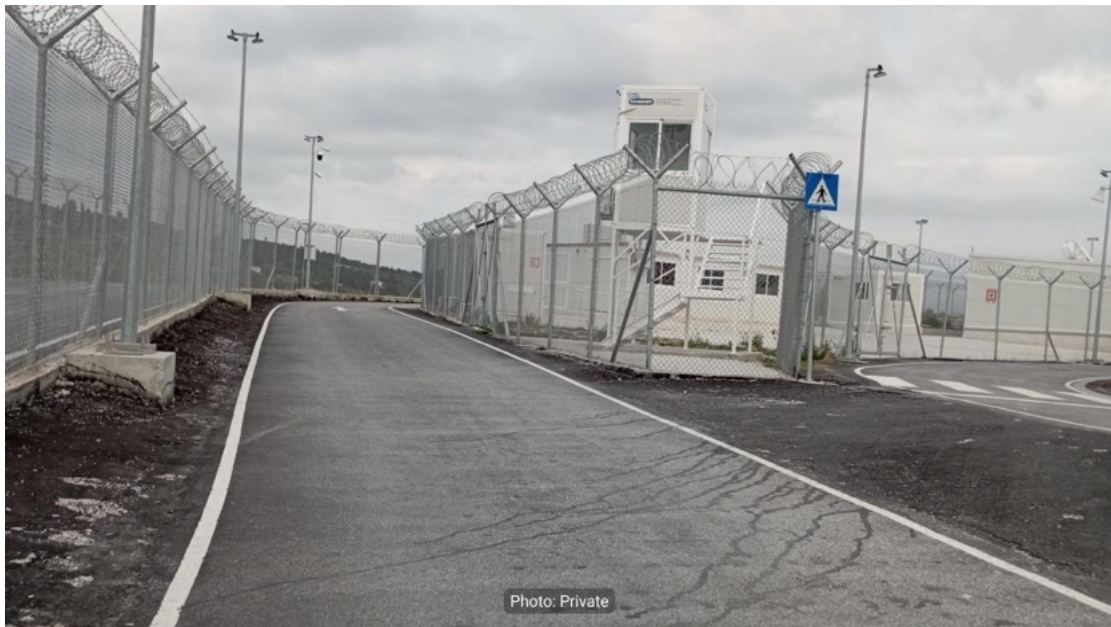


What is happening today in the refugee structures on the Aegean islands

Serious problems in the EU-funded structures



May 2023

Refugee Support Aegean (RSA)

PRO ASYL

<https://rsaagean.org/en/ccac-aegean-islands-greece/>

Greek: <https://rsaagean.org/el/ked-nisia-aigaiou/>

Table of Contents

What is happening today in the refugee structures on the Aegean islands.....	1
Introductory note.....	3
Extensive surveillance and repression measures.....	6
Main problems of residents in the CCAC.....	9
Problems in the CCAC related to reception and asylum procedures.....	12
The European Commission's supervisory role in the new structures on the islands..	14
LESVOS.....	16
Difficult living conditions.....	20
Significant shortages of health and interpreting staff.....	21
Problems with access to lawyers.....	22
The Black Hole of the Controlled Facility for Temporary Accommodation of West Lesvos.....	23
Temporary break for the EU-funded superstructure in Vastria by the Council of State.....	25
CHIOS.....	28
Without a doctor and a social worker.....	30
Shortages of basic goods.....	31
Interpretation and legal support.....	31
Obstacles to the construction of the new superstructure in the Tholos area.....	33
SAMOS.....	34
Isolation and strict guarding conditions.....	36
Shortages of services.....	38
Problems in legal support and medical care.....	39
KOS.....	41
Small amounts of food and problems of living.....	44
Reported strict controls resembling imprisonment.....	45
Deficiencies in medical care and legal support.....	46
LEROS.....	48
Shortages of basic goods.....	50
Body controls out of legality.....	51
Shortcomings in legal assistance.....	51

Introductory note

Seven years after signing the toxic EU-Turkey "agreement", the East Aegean islands remain "black holes" for the fundamental rights of applicants for international protection. According to recent data, arrivals had increased significantly in late 2022 and early 2023¹. At the same time, allegations of deterrence practices and informal forced returns (pushbacks) at maritime borders continue. In the Closed Controlled Access Centres (CCAC) in Samos, Kos and Leros - the construction of which was 100% financed by the European Union - as well as in those in Lesbos and Chios, asylum seekers and their children live in remote areas with [disproportionate](#) security and surveillance measures, facing reported violent behaviour by security authorities and with significant shortcomings in legal assistance, medical care and interpretation. Shortcomings can be observed even in basic necessities due to delays in competitions, the withdrawal of NGOs, but also due to delays in the provision of the monthly financial assistance allowances provided for asylum seekers².

In November 2020, the Commission awarded €121 million for the construction of reception centres on the islands of Samos, Kos and Leros. On 29 March, the Commission awarded a further grant of €155 million to the Greek authorities to build new reception centres on the Greek islands of Lesbos and Chios.

"The European Commission is supporting the Greek authorities to set up new multi-purpose reception and identification centres on five other Greek islands. Construction of the new centres has already finished on Samos, Kos and Leros, while preparation is in full swing for the new centres on Lesbos and Chios.":

Source: <https://bit.ly/sdager2>

¹ Flows in January 2023 increased by 278% compared to the corresponding month of 2022 and in February 2023 increased by 69% compared to the corresponding month of 2022. Residents on the islands were 44% more in January 2023 compared to the same month in 2022 and 46% more in February 2023 compared to the same month in 2022. In January, transfers of applicants from the islands to the mainland increased by 326% compared to the corresponding month of 2022 and in February by 104% compared to the corresponding month of 2022. Ministry of Migration and Asylum, Briefing Notes January 2023 and February 2023, available [here](#) and [here](#). Also, the number of arrivals from the maritime border [increased](#) in 2022 by 195% compared to 2021 due to the departure of more people from Turkey and Lebanon in that year, who were rescued in Greek waters. The Turkish authorities reported that they [rescued](#) or arrested about 3,000 refugees and migrants at sea in January 2023. Greek Prime Minister Kyriakos Mitsotakis [reported](#) in mid-January that approximately 250,000 illegal entries at the land border and almost 45,000 at the sea border were prevented in 2022.

² A monthly allowance of EUR 75 is provided for individuals and EUR 210 for families with four or more members. Ministry of Migration and Asylum, Benefits-Financial Aids, available [here](#).

The Greek government has announced the construction of similar Closed Controlled Access Centres in Lesbos and Chios, but it is currently facing significant legal obstacles and the opposition of a large part of the local community. Housing and security conditions may have improved in the structures on the five islands in relation to the past³, as there are no longer tents and makeshift shelters, but they still do not meet the reception and protection needs of applicants for international protection despite the huge amounts given for their construction⁴.

The situation on the islands' CCAC is difficult to capture as different practices are observed and there seems to be no unified way of managing the issues that arise. With this information note, Refugee Support Aegean (RSA) and PRO ASYL attempt a short description, firstly of the general conditions in all structures, and then, based on the specific conditions and data for each island.

For this note, RSA conducted research between February 15 and March 31, 2023, including field research in Lesbos and Kos and through telephone interviews, and used statistics published until early April. The data mentioned below were collected from cases we have undertaken and our experience in the field, communications with organisations in the field, testimonies from asylum seekers residing in the structures, people working in the structures, volunteers and actors in solidarity living on the islands, as well as official communications with the competent authorities and UNHCR. We would like to thank everyone who provided us with information and spoke with us during this research. We note that, as far as the competent authorities are concerned, we received an official response only from the Special Secretariat for the Protection of Unaccompanied Minors of the Ministry of Migration and Asylum, as set out below. Despite our persistent efforts, we did not receive a response from the Reception & Identification Service (RIC & CCAC), from the Regional Services of the Reception and Identification Service, nor from the National Public Health Organisation, as far as the

³ For the situation in the past, read more in indicative texts of Refugee Support Aegean: [2017, 2019 \(Kos\), 2020, 2020 \(Lesvos\), 2022](#).

⁴ The Greek Council for Refugees (GCR) and Oxfam have [recommended](#) the establishment of a clear and transparent public reporting mechanism on EU funds spent, resources used and for what purposes in these centres, including parts of the premises that are or are not functioning, with written justifications.

medical and support staff in the structures are concerned. The data refer to the situation in the research period, unless otherwise stated. We note that these data are dynamic, due to the frequent changes observed in structures.

In 2015, the EU, in order to deal with refugee flows, introduced the hotspot approach based on which the structures on the islands of Lesbos, Chios, Samos, Kos and Leros operated as Reception and Identification Centers (RIC) for third-country and stateless individuals who enter the country illegally until they undergo procedures of reception and identification and submit an application for international protection (asylum). Successively from late 2021, these structures were transformed into Closed Controlled Access Centres (CCAC). In EU documents, the centres are referred to as "Multi-Purpose Reception and Identification Centres (MPRIC)", while the Greek government has officially chosen the term CCAC. CCAC are regional operation units of the Reception and Identification Service. CCAC may also include a Reception and Identification Centre, a temporary accommodation facility, as well as special accommodation facilities with all the necessary provisions for vulnerable individuals. Unaccompanied minors are hosted in separate areas that operate as "safe areas." There are also provisions for the operation of Pre-Removal Detention Centres within separate areas of the CCAC which are directed by the Greek Police: <https://bit.ly/3pojUk5>.

For the purposes of this text, the term CCAC will be used everywhere to refer to the structures of the five islands which are the subject of this research.

Extensive surveillance and repression measures



Samos CCAC

The new structures were heralded as open accommodation structures, providing better conditions and security, but are actually more akin to prisons⁵. Asylum applicants residing in the CCAC on the five Aegean islands are living under increased control, surveillance and repression. In all structures there are multiple security measures.



Leros CCAC

In particular, the CCAC in [Samos](#), [Kos](#) and [Leros](#) are surrounded by an external NATO-type double security fence (in Lesbos and Chios the construction of the

⁵ "The facilities will be open reception centres with control of entry and exit for the residents and necessary limitations to ensure full safety and security for all groups of residents, the personnel, and the local population. The residents will be able to come and go at will.": [Source](#).

respective centres is pending). Control systems such as turnstiles, magnetic gates, x-rays, two-factor access control system (identity and fingerprint) have been installed at the entrance of the structures and must be passed by in order for the residents to enter and exit the structure⁶. Also, every time they return they are subjected to bag and body check and pass again by metal detectors. Children residing in Samos and Leros CCAC also undergo a security check even when they return from school.



The Greek Minister of Migration and Asylum in the hall of the Incident Management Centre

In addition, a Closed Monitoring System (CCTV) has been installed throughout the structures, using "smart" software in order to early warn about any incidents, and has the ability to give alerts and image to the Local Event Centre, the Control Centre in Athens and the Control Centres of other stakeholders (e.g. Greek Police). Fencing, as well as turnstiles with card readers, have been placed in the separate sections of the structures. The aim, according to the Ministry of Migration and Asylum, is "to protect the workers there and vulnerable groups, such as unaccompanied children and single parents". In the Samos, Kos and Leros CCAC the establishment of a special detention facility is also **planned** in accordance with Article 31 of the L 3907/2011 (A'

⁶ "Access of both temporary residents and those working in the CCAC is controlled through the YPERION Access Control and Monitoring System and the equipment installed at the central gates [turnstiles, magnetic gates, x-rays, two-factor access control system (identity and footprint)] and ensures the safe and controlled entry and exit from the structure to whoever is entitled to it. Controlled access is carried out through rotating protection bars (turnstiles) which are activated upon confirmation of the presence and identity of the cardholder" Instruction Manual for the Entry-Exit Management of Closed Controlled Access Centres - Ministry of Migration and Asylum, General Secretariat of Reception, Reception and Identification Service, Directorate of Reception and Identification Centres & Closed Controlled Access Centres on the islands, Version 1.2 | | March 2022.

7) which will operate as the Service of the Greek Police, at the level of the Police Station.

The testimonies we have gathered speak of conditions of constant control, monitoring and repression, but also of cases of verbal abuse by the staff of the structures to the residents, with no sanctions. The circumstances created by the intensification of security and the lack of special security staff training, combined with traumatic experiences of refugees entering the border, have significantly aggravated the psychological situation of the residents and violate fundamental rights of those living but also working there, including their rights to freedom of movement and privacy.

Departure of residents from the structure is allowed from 7 a.m. to 9 p.m. Compliance with time of entry and exit from the CCAC, as well as the overnight stay within the structure, are [mandatory](#). Until November 2022, all new arrivals were transferred to temporary structures or quarantine facilities, and in the case of Kos to the Pre-Removal Detention Centre (PROKEKA), for a period of 14 days and since then for at least five days⁷. According to reports, those who are quarantined don't have access to their mobile phone and the rest of the world.

We should note that asylum seekers were, at least until the end of March 2023, the only population group still subject to mandatory COVID-19 quarantine upon arrival in Greece for at least five days.

Newcomers are not allowed to leave the structure or go to another wing of the CCAC until they have received an asylum seeker's card - this is a restriction of liberty granted under the reception and identification procedure before an asylum application is registered under the law. At least in the cases of Lesbos and Kos, mainly due to delays in registrations, this restriction of liberty extends in some cases beyond the 25 days provided for in the legislation as the maximum limitation period for the purpose of completing the reception and identification procedures.

Finally, all structures are located outside urban fabric and/or in remote areas, where access is very difficult, contributing to their further isolation. Apart from the fact that those moving have to pay for a ticket (from EUR 1 to 2.10 per person every time

⁷ Until March 27, 2023, the restriction of movement on the islands' CCAC was based on the Joint Ministerial Decision taken in the midst of the COVID-19 pandemic and which had been renewed since then, despite the fact that for the general population of the country all restrictive movement measures had been lifted from the previous year. Recent D1a/SG.oik.17849/24.3.2023 FEK (FEK B' 1954/26-03-2023) available [here](#).

depending on the island - an important cost given the poor financial situation of applicants), in some cases transport is particularly scarce, and residents, in order to move, have to walk many kilometres, take a taxi - or simply avoid moving.

Aggregated data on distances and travel costs for the Aegean islands' CCAC

CCAC on the islands	Distance from the island's urban center (km)	Transport ticket cost per person per route (euro)	Taxi transport cost (euro)
Lesvos	5	1 €	6,50 €
Chios	8	1,50 €	13 €
Samos	9	1,60 €	14 €
Kos	15	2,10 €	20 €
Leros	6	2 €	13 €



We note that the Controlled Facility for Temporary Accommodation of West Lesvos (Megala Therma or Kastelia) is the only discrete structure that still operates today with almost zero staffing and no first reception conditions. This structure was used for newcomers under the pretext of quarantine, at least until the end of March 2023, and in practice as an informal place of arbitrary detention until the official transfer of newcomers to the Lesvos CCAC.



Controlled Facility for Temporary Accommodation of West Lesvos (Megala Therma or Kastelia)

Main problems of residents in the CCAC

In all the CCAC of the islands there is significant reduction in personnel but also the departure of organisations previously working in the field, with serious consequences

in the provision of necessary services⁸. The departure of organisations is also due, among other things, to the [disproportionately strict conditions](#) for registration in the NGO Registry of the Ministry of Migration and Asylum.

In addition, there are serious shortages of medical staff and psychosocial support, and deficiencies in the provision of interpretation in all islands. Especially after the European Union Agency for Asylum (EUAA) has stopped providing interpretation services, and until METAdrasi's interpretation services are fully developed, the problem has become increasingly acute in all islands.

Also, due to the lack of medical staff in the CCAC, the [already](#) understaffed general hospitals on the islands are being heavily burdened with cases that require primary care and could probably have been treated within the CCAC. Refugee Support Aegean (RSA) has undertaken to meet part of the needs of medicines since June 2021 in cooperation with local pharmacies, for people living in structures in Lesbos, Chios, Samos and Kos and are unable to bear the respective costs.

Lesvos CCAC	Yes
Chios CCAC	No
Samos CCAC	No
Kos CCAC	No
Leros CCAC	Yes

All CCAC also record significant delays in the provision of the monthly financial assistance allowances, which the Administration is required to provide to asylum seekers until the processing of their application has been completed. According to the procedure, the Reception and Identification Service has a list of beneficiaries which is updated every month. From the moment of entry in the list of beneficiaries, a period of at least 15 days is required to "climb up" the system, while in Kos and Lesbos we were told that the acquisition of a Greek mobile number is also necessary.

⁸ The issue is highlighted by the Panhellenic Association of Employees in the Reception and Identification Service of Third Country Nationals, which refers to understaffing and staff shortages in structures, 23 September 2022, available [here](#).

Therefore, the initial reception of the allowance requires at least forty days, without any retroactive payments. A vulnerable woman living on Lesbos, whose case was taken over by Refugee Support Aegean, was deprived of the cash card she was entitled to for several months, by mistake of the system. There are also cases of people who, in the meantime, either received international protection status or had their request rejected, resulting in them never receiving the allowance.

In CCAC, there are also, in certain cases, shortcomings in hot water and baby milk, in baby diapers and bed linen, and poor quality of mattresses. Poor quality and quantity of food are among the most serious problems, and it also seems that there is no provision for a special diet in cases of serious health problems, nor for baby foods. There are also significant maintenance problems in containers.

Within the structures there is a lack of recreational activities. Spaces of creative activities or shop spaces, as intended⁹, have not in most cases been put into operation. This also applies to spaces that are already ready to function, e.g. laundry rooms in Kos. There are not enough shaded areas, making it impossible for residents to stay in open space, especially during the summer months.

⁹ See respectively for [Samos](#), [Kos](#), [Leros](#).

Problems in the CCAC related to reception and asylum procedures



Photo: Private

Kos CCAC

At the start of the reception and identification process in the CCAC a key stage is to establish the vulnerability of asylum seekers (subordinated to one of the categories listed indicatively in the Asylum Code) by the Medical Control and Psychosocial Support Unit, as it is a prerequisite for the provision of specific reception conditions and is directly related to granting specific procedural guarantees. With the current deficiencies of medical and psychosocial personnel as reflected on each island, vulnerability assessment is significantly delayed. In Kos and Chios, for example, vulnerability assessment is performed by National Public Health Organisation missions occasionally coming from other parts of Greece, off the island, with obvious consequences on the timing and effectiveness of registration, but also on the monitoring of vulnerability after registration. As a result, in many cases, the procedure of examining an asylum application is initiated without the necessary registration of vulnerability, and with serious shortcomings in supporting and referring vulnerable cases.



The entrance of Kos CCAC

Furthermore, asylum procedures on the islands are often carried out at an extremely rapid pace and with extremely short deadlines, obviously at the expense of the quality of the procedure. This is actually an application of the border procedure, which should not be applied at all¹⁰. There is no provision of legal information and assistance to all newcomers, which is exacerbated by the significant lack of interpreters, while there are delays and rescheduling of interviews without timely information/summons of applicants. There are also serious shortcomings in legal support on all islands, as a result of the reduction of organisations operating in the field and the discontinuation and resumption of relevant programmes¹¹.

It emerges from the nationalities of the residents that there is often a large number of asylum seekers, particularly from Afghanistan and Somalia, whose claims are dealt

¹⁰ For more on the border procedure, read [here](#).

¹¹ Applicants for international protection in Greece are also provided free legal assistance at the second degree of the asylum procedure, by a lawyer included in the *Register of Lawyers of the Asylum Service* for the purposes of applying the legal remedy provided by para. 5 of Article 7 of L 4375/2016 before the Appeals Authority referred to in Article 4 of the same Law, in accordance with the specific terms and conditions of this Decision.

with under the Joint Ministerial Decision (KYA) which defines Turkey as a “safe third country” and are therefore rejected as unacceptable without any consideration in substance, exposing residents to a precarious situation in an limbo state. These people are cut off from reception conditions while they are currently allowed to stay in the CCAC.

The European Commission's supervisory role in the new structures on the islands

Following the fire that completely destroyed the RIC in Moria in September 2020, the European Commission announced the provision of funding the Greek authorities for the new structures and - for the first time in the annals of European asylum policy - co-managing a new structure in Lesvos. At the same time, it created the Task Force Migration Management as a mechanism to facilitate the coordination between the EU institutions and the Greek authorities, agencies and bodies involved in migration management. The Task Force is also aimed at supervising and ensuring compliance with European standards in structures on the islands, but the precise role of the Task Force and the distinction between the operational support towards the authorities and the enforcement of European rules remains [unclear](#). At the same time, it remains doubtful whether the establishment of the Task Force has actually contributed to the fulfilment of the objectives for which it was created, as the majority of the measures agreed in a Memorandum of Cooperation with the Greek authorities in December 2020 [have not been delivered to date](#).

Based on the reality in the CCAC in the Aegean islands, as shown by this RSA research, in particular the serious deficiencies in medical and psychosocial personnel and the regime of incarceration and excessive policing, the obvious need is to strengthen the reception system, investing in decentralised forms of reception in small open structures within the urban fabric throughout the Greek territory. For as long as the structures on the islands function as hotspots, with newcomers staying semi-permanently in them until the completion of their asylum procedure, the conditions in them will continue to be incompatible with the legal obligations of the country towards asylum seekers and with European standards.


The only way to fulfil the country's obligations and respect the fundamental rights of refugees is to radically change the European migration and asylum policy. The EU-funded structures on the islands are precisely an expression of failure of this

European policy, aiming to - unlawfully- prevent arrivals to the EU, through the externalisation of borders and generalised militarisation.

Aggregated data for the Aegean islands' CCAC

Island:	Lesvos	Chios	Samos	Kos	Leros
Arrivals January 1 to April 2	1531	244	620	493	162
Nominal capacity	8000	1014	2040	2356	1780
Residents on March 31, 2023	2152	411	876	443	258
Men (%)	48%	56%	68%	59%	59%
Women(%)	26%	29%	18%	19%	19%
Children(%)	26%	15%	14%	22%	22%
"Safe area" for children - nominal capacity	100	72	320	170	100
Unaccompanied minors	95	39	50	53	20
Children residing in the "safe area"	55	39	44	34	18

Ministry of Migration and Asylum, March 2023, Special Secretariat for the Protection of Unaccompanied Minors in Greece, March 2023, UNHCR (+weekly snapshot 2/4/2023) • Demographic data for the Dodecanese are undivided



We proceed by analysing the conditions in the five Aegean islands where there are relevant structures (Lesvos, Chios, Samos, Kos and Leros).

LESVOS



Lesvos CCAC, Kara Tepes, Mavrovouni

27% of the total number of arrivals in 2022 [entered](#) Lesvos. According to UNHCR [data](#), from January to April 2, 2023 a total of 1,531 people arrived on the island. The structure is located in the Mavrovouni location, about 5 km away from the centre of Mytilene. It began its operation as a Temporary Accommodation Structure for Asylum Seekers after the [destruction](#) of the Reception and Identification Centre in Moria from a fire in September 2020, and has since functioned as the Reception and Identification Centre of Mytilini (RIC Lesvos). In November 2022, the structure was transformed from a Reception and Identification Centre (RIC) to a Closed Controlled Access Centre (CCAC). It is located in a former shooting range and is very close to the sea, exposed to the weather conditions, especially to the north wind and dust, which makes living there really difficult.



LESVOS CCAC	
Arrivals January 1 to April 2	1531
Nominal capacity	8000
Residents on March 31, 2023	2152
Men (%)	48%
Women (%)	26%
Children (%)	26%
Afghanistan	42%
Soudan	11%
Eritrea	10%
Yemen	8%
Somalia	8%
other	21%
"Safe area" for children - nominal capacity	100
Unaccompanied minors	95
Children residing in the "safe area"	55

UNHCR (+weekly snapshot 2/4/2023), Ministry of Migration and Asylum, March 2023, Special Secretariat for the Protection of Unaccompanied Minors in Greece, March 2023

Lesvos CCAC	
Distance from the island's urban center (km)	5
Transport ticket cost per person per route (euro)	1€
Taxi transport cost (euro)	6,5€

We note that the structure has reached the upper limit of its actual capacity
 (Lesvos Inter-agency coordination meeting, 27 March 2023)

In the structure, the nominal capacity amounts to 8,000 people. On March 31, 2023, 2,152 people lived there. 48% of them were men, 26% were women and 26% were children, and their nationalities were from Afghanistan (42%), Sudan (11%), Eritrea (10%), Yemen (8%), Somalia (8%) and others (21%). We note that the structure has reached the upper limit of its actual capacity, according to the Lesvos Inter-agency coordination meeting of March 27, 2023. According to the Special Secretariat for the Protection of Unaccompanied Minors of the Ministry of Migration and Asylum¹², there were 95 unaccompanied minors on March 9 in Lesvos CCAC, 55 of whom lived in the "safe area" with a nominal capacity of 100 children.

There are worrying reports that unaccompanied minors, including unaccompanied girls, remain after arrival in the CCAC, often for an unspecified period of time, at periods when accommodation facilities for unaccompanied minors are full. RSA also points out that survivors of shipwrecks, belonging to a vulnerable group due to the state of danger they have experienced and because they often have lost family members, are driven to the CCAC immediately after their rescue, without receiving special reception conditions.

Regarding alternative forms of housing on the island, according to the UNHCR¹³, the local NGO Iliaktida provides a structure for unaccompanied minors and IOM operates the "safe area" for unaccompanied minors. In addition, Diotima operates a programme for emergency housing for gender violence survivors, while the local NGO Solidarity Lesvos operates a housing programme for single women or/and with very young children. Finally, there are more than 220 people who have found housing on their own.

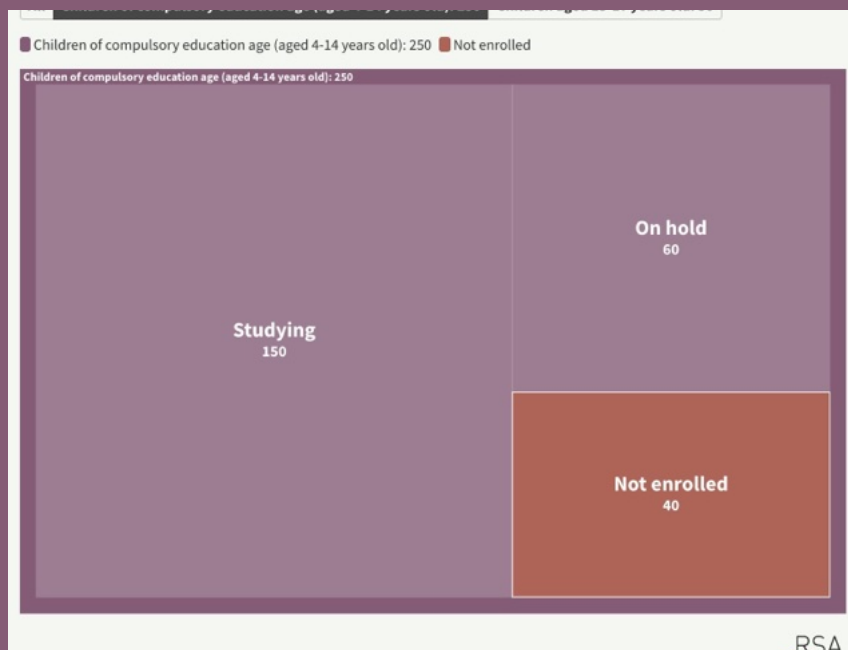
¹² Written response to RSA on March 16, 2023, with the clarification that in Lesvos, along with the safe area within the structure, there is a place of unaccompanied minors accommodation. This 40-person capacity space operates under the Ministry of Migration and Asylum with the cooperation of the IOM. 40 unaccompanied minors are currently housed there. The discrepancy between all unaccompanied minors and those living in a safe area refers to minors separated by a temporary custody act.

¹³ Information from the UNHCR written response to RSA on March 16, 2023.

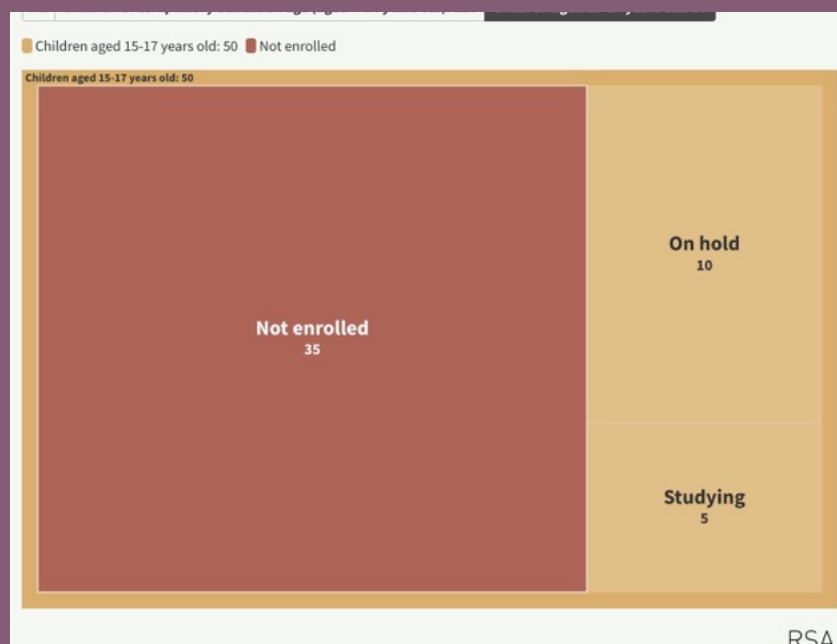
Participation of refugee children residing in CCAC in formal education

There is an improvement over 2022 with regard to the participation of refugee children residing in CCAC in formal education, while at the same time, there are constant transfers of the children, since a significant number of the residents are transferred to structures in the mainland.

In mid-March, out of 250 children at the age of compulsory education (4-14), 210 were enrolled in public schools, 150 were actually studying and 60 were on hold.



Out of the 50 children in the 15-17 age group, 15 were enrolled and only 5 attended courses.



Within the CCAC, METAdrasi NGO provides non-formal education courses for minors and adults, while a few students attend evening schools. There is, however, an improvement over 2022 with regard to the participation of refugee children residing in CCAC in formal education, while at the same time, there are constant transfers of the children, since a significant number of the residents are transferred to structures in the mainland. In mid-March, out of 250 children at the age of compulsory education (4-14), 210 were enrolled in public schools, 150 were actually studying and 60 were on hold. Out of the 50 children in the 15-17 age group, 15 were enrolled and only 5 attended courses.

Difficult living conditions

The newcomers to Lesbos, before their official registration, resided quarantined in rubhalls¹⁴ in the CCAC at least until the end of March 2023, with the exception of those who are transferred to the Controlled Facility for Temporary Accommodation of West Lesbos. According to testimonies from cases legally handled by RSA, there were cases in the previous period when newcomers had to sleep on mattress-free palettes and at particularly low temperatures.

There are shortages in hot water, children's milk and bed linen, poor quality of mattresses, as well as complaints about the quality of food. Residents and people working in the structure speak of very frequent power cuts in addition to general problems. They also refer to economic hardship due to inability to find a job. Sabira*, an Afghan woman who has been living with her husband and three children for 5 months in a container, tells to RSA¹⁵: *"We have no help. We used to be given shampoos and dish detergent, but now we receive nothing. There's no organisation to help us here. (...) We have received the financial assistance allowance only for 2 months. We used it to buy shampoo and internet access. Money is not enough. (...) My children need to take something to school for food, and we have nothing to give them. Not enough water is given to us, they only give us one bottle a day for each person."* Significant deficiencies are observed in adult empowerment and reception

¹⁴ Particularly large, shifting structure like a tent, often used in emergency situations.

¹⁵ Interview by telephone, March 7, 2023.

activities within the structure, aggravating the mental state of the residents. *"One day spends like a year,"* the woman adds.

On Lesbos, as in all CCAC, there are conditions of constant control, surveillance and repression, while a worker in the psychosocial sector reported to us an increase in cases of violence and domestic violence. The mental state of many residents is especially burdened: *"There are people who once they arrive on the island they are being chased by hooded people [in the context of informal forced return operations¹⁶]. They're very traumatised. They constantly live in fear and insecurity"* an employee emphasises to RSA.

Significant shortages of health and interpreting staff

Despite the relative improvement of housing conditions in relation to the notorious structure in Moria, the situation within the CCAC of Lesbos is particularly worrying, mainly due to the lack of medical staff, psychologists and interpreters. At the end of March there were only two National Public Health Organisation doctors inside the CCAC and the procedure for identifying vulnerability was very problematic. There is also reference to huge gaps in interpretation and shortages of personnel at the Reception and Identification Service.

"There are people who have been granted refugee status and they have the document in their hand, and they don't know what it writes and that they have been granted asylum," a person working in an organisation tells us. We should also note that the National Public Health Organisation stated that from January 11, 2023 and until further notice, its Psychosocial Unit would not accept requests for psychological support due to lack of interpreters. By the end of March the provision of interpretation to the Unit had not been fully restored, resulting in significant gaps. The problems are exacerbated by the significant burden, due to the lack of staff, of the [already](#) understaffed general hospital of the island, causing reactions by the residents. In addition to this structure, Médecins Sans Frontières provides medical services and so does INTERSOS organisation with mental health and psychosocial support programmes. Regarding the effects of the security and surveillance regime within the CCAC on the physical and mental health of residents, Apostolos Veizis, doctor and

¹⁶ According to reports, apart from cases of informal forced returns during sea operations, in Lesbos there have been recorded informal forced returns even of people who had already arrived in Lesbos and stayed in the quarantine area in West Lesbos. See [here](#) and [here](#) (p. 21-22).

general director of INTERSOS HELLAS, says to RSA: *"Uncertainty, lack of health services, general lack of support services for these people, have serious consequences. We have seen in people who have had traumas, those traumas growing, and we have seen people who were healthy, then ailing, physically and mentally, under those circumstances. After the sessions in our centre these people have to go back to the CCAC, to the same place where the pain is 'produced'."*

Problems with access to lawyers

Since the summer of 2022 and until the end of the year, there were significant problems in the access of lawyers within the structure. As RSA has [pointed out](#) in a joint submission along with the organisation HIAS to the European Ombudsman, lawyers wishing to enter the structure, had to submit a "request of entry" for each one beneficiary they wished to visit, at least one day in advance, in order to receive the "necessary approval" from the Administration of the CCAC. Beneficiaries also had to have given to the lawyers a signed authorisation in order for them to get an admission of entry - even for their first contact with them. These problems seem to have been solved for the time being after the reaction of the organisations in the field and the invocation of the opinion of the Athens Bar Association towards the Ministry of Migration and Asylum. At the present stage, for lawyers to enter, they must only show their lawyers' identity.

According to the UNHCR¹⁷, free legal services within the CCAC were provided in mid-March in the UNHCR Protection Centre on a daily basis, starting 10 a.m. by 5 pm, and alternately by the Greek Council for Refugees (GCR) with a Greek lawyer, METAdrasi with two Greek lawyers and the European Lawyers in Lesvos (ELIL) with two Greek lawyers. Furthermore, as the UNHCR points out, apart from the ordinary presence of the aforementioned institutions, all legal assistance organisations in Lesvos have agreed to share their contact details in a "leaflet of legal assistance organisations", which is available in eight languages and distributed by the UNHCR to all newcomers on the island, before registration by the Greek authorities, and at any other time that the residents in the CCAC request information for legal assistance by the UNHCR. Refugee Support Aegean (RSA) is among the organisations that offer free legal assistance to CCAC residents on a permanent basis.

¹⁷ Ibid. 16.

The Black Hole of the Controlled Facility for Temporary Accommodation of West Lesvos



Controlled Facility for Temporary Accommodation of West Lesvos (Megala Therma or Kastelia)

The Controlled Facility for Temporary Accommodation of West Lesvos (Megala Therma or Kastelia) is complementary to the CCAC of Lesvos (Mavrovouni)¹⁸. The newcomers arriving within the Municipality of West Lesvos are transferred there. Although it is now officially under the jurisdiction and responsibility of the Reception and Identification Service of the Ministry of Migration and Asylum¹⁹, this structure does not abide by the prescribed registration and identification procedure and the identification of vulnerable cases, nor does it provide for appropriate reception conditions, with residents remaining in isolation from the outside world. The structure is located in a rented space in a remote area and receives people who have just arrived on the island. A deputy commander has recently been appointed there, but there is no administrative staff of the Reception and Identification Service on a 24-hour basis²⁰. At the end of 2022, two posts of specialised security personnel were provided for 24/7, as well as one post for general cleaning and disinfection duties, for 14 hours a day²¹. The duration of these services was set on January 1, 2023 and ended on March 31, 2023. For the remaining hours and at a distance from the site, there is

¹⁸ Founded by Article 34 para. 1 case c' PD 106/2020.

¹⁹ Article 12 PD. 77/17.11.2022 (FEK A '212/2022), that amended Article 34 PD. 106/2020.

²⁰ Decision under protocol number 747752/12.12.2022 of the Secretary-General for the reception of asylum seekers is relevant, available [here](#).

²¹ See the decision under protocol number 750660 of the Secretary-General for Migration Policy.

Greek Police staff, who cannot, however, de facto, respond to any urgent medical needs.

In this structure there is no medical or nursing staff, despite the fact that it is located more than 50 km from the Lesvos General Hospital "Vostanio" and about 30 km from the Kalloni Health Centre. The National Public Health Organisation Unit visits the structure in order to perform tests for Covid-19 and the Médecins Sans Frontières mobile unit visits the residents twice a week.

This structure was originally intended for a short stay of people. Even today, the necessary material living conditions are not provided, since it is located in a fenced open-air area, within walking distance from the sea and exposed to weather conditions. The individual parts within the structure are separated by barbed wire and people cannot move even within the structure, as the residents do not have the option of exiting the fenced area designated for them. Within each distinct fenced section, there have been placed plastic huts (RHUs/Refugee Housing Units) without beds, where residents reside in overcrowded conditions and without meeting the minimum standards of safe accommodation. There are makeshift faucets/showers/toilets inside the area, while there is insufficient access to basic sanitation. Access to hot water is also extremely limited given the often large number of people living there. Electricity is provided by a generator for a few hours a day, with no provision for heating or cooling.

Newcomers are in fact kept in the structure arbitrarily without any information provided to them, without any relevant decision and without respecting the strict guarantees of legislation on imposing administrative detention or at least the restriction of liberty within the structure applicable during the reception and identification procedure, without initiating reception and identification procedures and without being notified of documents for them to know their legal status. Since November 2022, this informal detention usually takes five days and at least until a Covid-19 test is carried out. The actual time spent there, however, is unspecified and extended when no places are available in the CCAC, a phenomenon which was observed at the end of March in cases supported by RSA. The result is that people are arbitrarily detained without a formal reason, without a legal procedure, for a period which is not counted, albeit should, in the maximum number of 25 days of their 'restriction of liberty', as provided for in the Asylum Code.

Temporary break for the EU-funded superstructure in Vastria by the Council of State



The under construction new CCAC in the Vastria region

The Greek government aimed to [inaugurate](#) the new CCAC in the Vastria region and close the structure in Mavrovouni before Easter 2023. The new structure, despite the strong [reactions](#) of the local society, was located on an area of about 240 acres in a remote district in Northern Lesbos next to the landfill, and has a budget of EUR 76 million plus VAT. It is [adjacent](#) to a protected NATURA area and is 100% [funded](#) directly by the European Union through the Emergency Support Mechanism. The workings for its construction [were](#) conducted at an intensive pace in the previous autumn, despite the fact that a request for suspension had been submitted by the Northern Aegean Region and the neighbouring communities of Komi and N. Kydonia in the Council of State, while the issuance of the necessary Environmental Impact Assessment and the approval of the fire protection study were also pending. The Mytilene City Council in early February [issued](#) a unanimous negative opinion on the delayed Environmental Impact Assessment for Vastria and [recommended](#) the Region to reject it on grounds of public interest. The reactions from local factors are also strong, [accusing](#) the Minister of Migration and Asylum of lying.

The Council of State, in its interim [decision](#) (199/19.12.2022), upheld the application on the part examined related to the route of access to the Vastria structure, prohibiting its construction until the final judgement of the court on the application for annulment. The court upheld that the construction of the road would lead to irreversible destruction of the forest wealth and rare avifauna of the protected area.

At the beginning of February, the Minister of Migration and Asylum Notis Mitarakis [stated](#) that the project had reached 50% of its technical completion and is in the phase of full completion within 2023. At the end of March, and despite legal impediments, the construction continued on even non-working days.

Capturing the change of the natural landscape due to the construction of the new Lesvos CCAC in Vastria through satellite imagery.



21/11/2021



26/03/2023

The structure is designed to have a nominal force of 3,000 people, with the prospect of infrastructure being increased to nominal capacity of 5,000 or more people, while, within the same area, a Pre-Removal Detention Centre (PROKEKA) is also planned, that will have an initial nominal [capacity](#) of 2,000 people, which can also reach 5,000. As a result, the total nominal capacity of the two structures can easily reach or even

exceed 10,000 people. There are [serious concerns](#) that, due to the remote location, there will be no information and control on what will happen there, and of course there will be no potential for social pre-inclusion of refugees. There are also serious concerns regarding safety and forest fires. *"We are opposed to this construction in the heart of the biggest pine forest of the Aegean, since the risk of fire in these structures is very high, as we all know, and if, in the summer, a fire starts from there, it will burn thousands of acres of virgin forest and risk people's lives, as escape routes for so many thousands of people are problematic"* Michalis Bakas, environmentalist and coordinator of the Ecologist Greens in Lesvos, points out in RSA.

CHIOS



Vial, Chios CCAC

In Chios, there was also an increase of arrivals in the last months of 2022 compared to 2021. According to UNHCR [data](#), between January and April 2, 2023 a total of 244 people arrived on the island. Vial's former Reception and Identification Centre (RIC), which has been operating since 2016, was renamed in November 2022 to Chios' Closed Controlled Access Centre (CCAC). It is located 8 km from the city of Chios, bordering the village of Halkios. The structure was built in an older, abandoned aluminium plant, where half of the factory has been [used](#) in recent years as a waste separation and recovery centre, resulting in severe stench during the summer months. It has a nominal capacity of 1,014 people. Until November 2022, the newcomers were transferred to the quarantine structure in the Lefkonía area for a period of 14 days, as part of the protective measures for non-spreading Covid-19. The quarantine structure in Lefkonía was finally [closed](#) on 31 December 2022.



Recently, the number of residents has decreased substantially.

CHIOS CCAC	
Arrivals January 1 to April 2	244
Nominal capacity	1014
Residents on March 31, 2023	411
Men (%)	56%
Women (%)	29%
Children (%)	15%
Somalia	30%
Palestine	18%
Sierra Leone	14%
Democratic Republic of Congo	8%
Soudan	7%
other	23%
"Safe area" for children - nominal capacity	72
Unaccompanied minors	39
Children residing in the "safe area"	39

UNHCR (+weekly snapshot 2/4/2023), Ministry of Migration and Asylum, March 2023, Special Secretariat for the Protection of Unaccompanied Minors in Greece, March 2023

Chios CCAC	
Distance from the island's urban center (km)	8
Transport ticket cost per person per route (euro)	1,5€
Taxi transport cost (euro)	13€

Based on UNHCR [data](#), on March 31, 411 people lived there. 56% of them were men, 29% were women and 15% were children, and their nationalities were from Somalia (30%), Palestine (18%), Sierra Leone (14%), DRC (8%), Sudan (7%) and others (23%)²².

²² According to the UNHCR weekly snapshot for Chios, as of April 2, 2023.

According to the Special Secretariat for the Protection of Unaccompanied Minors of the Ministry of Migration and Asylum²³, on March 9, 39 unaccompanied minors were in Chios CCAC, all of whom lived in the "safe area" with a nominal capacity of 72 children. In mid-March, there was no longer a Commissioner for unaccompanied minors on the island, as the contract of the lawyer with that duty expired. At the same time, the Governor of the CCAC, whose term officially expires at the end of April, has stated his resignation. In Chios, the number of organisations active in the field has also decreased, with significant impacts on the provision of basic services and goods.

Alternative forms of housing for vulnerable adults and families no longer exist on the island. According to the UNHCR²⁴, METAdrasi operates a transitional accommodation structure for unaccompanied minors, the Ark of the World has a shelter for children whose parental care has been removed upon a prosecutorial order, while there are also some persons who have found housing with their own resources (self-accommodated).

Non-formal education courses for minors and adults residing in the CCAC are provided by METAdrasi.

Without a doctor and a social worker

The main problem in Chios during the RSA research period was the lack of a doctor within the structure as well as the deficiencies in psychosocial support, even for unaccompanied minors. Since April 2021 there has been no stable presence of a doctor within the structure. Also, there has been no social worker for a year, so, when an incident must be looked into, normally carried out only by a social worker, psychologists conduct the procedure. The vulnerability evaluation procedure seems to be inadequate, as in an attempt to find a solution to the serious shortage of medical staff, nursing staff is called upon to fill the gap, by asking asylum seekers questions. Then, the relevant documents are signed by a doctor who visits the structure from Chios' hospital or from a National Public Health Organisation Unit. This procedure excludes from medical examination those who are considered not meeting the vulnerability criteria, since they are provided for with a medical examination appointment and a medical card only in case of doubt.

²³ Ibid. footnote 12.

²⁴ Ibid. footnote 13.

In mid-February, Salvamento Maritimo Humanitario (SmH), which covered serious deficiencies in medical care within the CCAC, and was registered in the previous Registry of the Administration, had to cease its operation due to non-registration in the NGO Registry of the Ministry of Migration and Asylum. SmH had been on the island since 2015 with doctors and nurses, also providing ultrasound for the residents. Due to the withdrawal of SmH, which was cooperating together with the German organisation Offene Arme for the transport of emergency incidents to the hospital by taxi, and for supporting scheduled appointments, there was a large gap created, which has not been filled until now. The emergencies that arise in the structure must be served by the single National Emergency Centre (EKAV) vehicle on the island, which cannot already serve the existing needs of the local population, thus losing human lives. After the departure of SmH, residents - even pregnant women - must also address private doctors or the hospital (with significant delays) to make an ultrasound.

Shortages of basic goods

There is a significant improvement in the sense of security compared to the past. However, people who work inside the structure talk about containers in very poor condition, which need extensive maintenance to be habitable, and in most of which air conditioning does not operate, resulting in winter residents buying halogen stoves to warm up. Also, disinfestations are carried out, because of the many cockroaches in the spaces. The food is of low quality, and there are reports of food poisonings.

There are also serious problems with the schedules for transporting students from Vial to the public school. Clothes and shoes are provided by very few organisations outside the structure, such as Offene Arme. Employees report that there are shortages of basic goods at times, even for unaccompanied minors living in the structure.

Interpretation and legal support

In mid-March, the structure had three Arabic speakers, a French-speaking and a Somali interpreter, who were called to meet needs in other services as well, as at that time no other service had interpreters. The General Hospital of Chios "Skylitsios" no longer has interpreters, which makes it often extremely difficult for patients to

communicate with staff. When an emergency arises, interpreters by telephone are provided by the CCAC.

According to the UNHCR²⁵, legal assistance is provided within the CCAC by METAdrasi, with a full-time lawyer, as well as by PRAKSIS for legal proceedings of children in families, with a part-time lawyer. The organisations Equal Rights Beyond Borders, A.Ss.i.S.T. and RSA also provide legal support, but have no presence within the CCAC.



²⁵ Ibid. footnote 13.

Obstacles to the construction of the new superstructure in the Tholos area



The Ministry's goal was to open the new closed structure in April 2023, but a new deadline has been given for September 2023. Satellite Imagery: 9/7/2021

Despite the fact that the local society has expressed in various ways and [repeatedly](#) its total [opposition](#) to the construction of any superstructure in Chios and in particular in the Tholos area, the Ministry of Migration and Asylum insists on its construction. The Ministry's [goal](#) was to open the new closed structure in April 2023, but a new deadline has been [given](#) for September 2023. The construction of the 100% [financed](#) directly by the European Union closed structure in the Tholos area proceeds neither with the acceptance of the local society nor lawfully, with the Ministry's request for access of the machinery to the disputed area being challenged in four consecutive court [decisions](#). Last December, Chios' single-member Court of First Instance, which discussed the Ministry's request for interim measures in order to secure access to the Tholos area in question, refused issuing an interim order for the fourth time. The rediscussion of the interim measures is expected to take place on July 5, 2023, before the Chios' single-member Court of First Instance. The Minister of Migration and Asylum has [extended](#) by amendment the possession of Vial (of municipal property) until December 31, 2023 for its use as a Reception and Identification Centre²⁶.

²⁶ L 5003/2022 FEK 230/A'/14.12.2022, Article 136.

SAMOS



Samos CCAC

There were increased flows of people recorded in Samos in the last months of 2022, as [were](#) in the first months of 2023. According to UNHCR [data](#), between January and April 2, 2023 a total of 620 people arrived on the island.

The Closed Controlled Access Centre (CCAC) of Samos was inaugurated in September 2021 after the [closure](#) of the Reception and Identification Centre (RIC) in Vathi and despite the [reactions](#) of local actors and civil society. It is located in the "Zervou" location of the Municipality of Eastern Samos, in a mountainous spot, in the area of the old slaughterhouses, about 9 km from Vathy (the capital of the island). Within the structure, office infrastructure has been [created](#) for around 400 jobs, to meet the needs of the Ministry of Migration and Asylum, the Greek Police and other stakeholders. Based on UNHCR [data](#), on March 31 876 people resided there, with a nominal capacity of 2,040. 66% of them were men, 20% were women and 14% were children, and their nationalities were from Palestine (30%), Sierra Leone (27%), DRC (14%), Afghanistan (6%), Sudan (3%) and others (20%)²⁷. According to the Special Secretariat for the Protection of Unaccompanied Minors of the Ministry for Migration

²⁷ According to the UNHCR weekly snapshot for Samos, as of April 2, 2023.

and Asylum²⁸, on March 9, 50 unaccompanied minors resided in the CCAC of Samos, 44 of them inside the "safe area", which has a nominal capacity of 320 children.



SAMOS CCAC	
Arrivals January 1 to April 2	620
Nominal capacity	2040
Residents on March 31, 2023	876
Men (%)	68%
Women (%)	18%
Children (%)	14%
Palestine	30%
Sierra Leone	27%
Democratic Republic of Congo	14%
Afghanistan	6%
Soudan	3%
other	20%
"Safe area" for children - nominal capacity	320
Unaccompanied minors	50
Children residing in the "safe area"	44

UNHCR (+weekly snapshot 2/4/2023), Ministry of Migration and Asylum, March 2023, Special Secretariat for the Protection of Unaccompanied Minors in Greece, March 2023

Samos CCAC	
Distance from the island's urban center (km)	8
Transport ticket cost per person per route (euro)	1,6€
Taxi transport cost (euro)	14€

²⁸ Ibid. footnote 12.

NGOs operating on the island provide accommodation outside the structure to a very limited number of people. According to the UNHCR²⁹, as regards alternative forms of housing, there is only the transitional accommodation structure for unaccompanied minors by METAdrasi and a limited number of self-accommodated people, supported by the NGO Space Eye for renting apartments in an urban environment.

METAdrasi offers non-formal education courses for adults within the CCAC, while outside the CCAC, Greek courses are provided by volunteers. According to the RSA research, in mid-March a significant proportion of the children residing within the CCAC attended the public schools. However, there is a shortage of space in the halls of the Gymnasium and Lyceum's reception classes, due to the lack of rooms. The Centre for Homework and Creative Activities by ARSIS operates in Samos, providing evening tutoring services for refugee children attending the public schools of the island, teaching Greek and English language and mathematics for unaccompanied minors, as well as providing life skills courses for all children³⁰. At the end of March a total of 98 children attended.

Isolation and strict guarding conditions

The structure is guarded by the Greek Police and by a private security company 24 hours a day, with at least 50 uniformed people present on each shift. As refugees and lawyers told us, some of the main problems facing residents are isolation from the local community, [disproportionately](#) strict guarding, and even the use of force by the authorities. In a [publication](#) earlier this year, refugees complained that police officers — border guards had ferociously and unfairly beaten them, after taking them to a darkened part of the structure. The North Aegean Police Directorate has announced the launch of a Sworn Administrative Examination (EDE) on the incidents. Regarding the severe guard and surveillance conditions, employees were complaining about the violation of privacy experienced by residents and themselves as early as the beginning of 2022³¹. According to publications, even children are forced to [undergo](#) strict controls every day, i.e. in their school backpacks.

²⁹ Ibid. footnote 13.

³⁰ The Centre for Homework and Creative Activities operates under the programme "All Children in Education", which is an initiative of UNICEF co-financed by the European Union and implemented by a number of partners, including ARSIS - Association for the Social Support of Youth.

³¹ See [here](#) and [here](#).



Samos' CCAC was the first structure in which such strict control and surveillance measures were applied. The Greek Council for Refugees (GCR) had [warned](#) as early as 2021 that this regime "violates the right of residents to private individual and family life" and that "the imposition of all manifestations of these people's lives within a closed structure, within strict planning and control, implies the absence of private life, the destruction of their identity and dignity". Médecins Sans Frontières have [described](#) the new structure as a "dystopian nightmare that will contribute to isolation and further re-injury" and have [noted](#) that the high-security infrastructures affect people's mental health.

By talking to residents, it emerges that some people feel a sense of security in the presence of security and surveillance measures; others, however, feel that these are excessive and do not make sense: "They are strict and we do not feel their effectiveness, since there are still property losses, damages and quarrels" says Mohamed*, a Palestinian asylum seeker³². It is also doubtful whether data collected from the cameras can also be used when the residents themselves need it, for example for legal reasons. "As lawyers of the organisation HRLP, we have received dozens of complaints regarding police violence within the CCAC of Samos and we have also filed a complaint for one of our principals. To the best of our knowledge, no CCTV cameras have been yet used to investigate the complaints. We also know from principals convicted by the Samos' Criminal Court for their alleged involvement in

³² Interview by telephone on March 17, 2023.

incidents within the structure, that they were asking both the police authorities and the Court to use the video footage of the CCTV cameras in order to prove their innocence, which however never happened. Having now undertaken their defence, we will request the reception of the material for the Court of Appeal" as lawyers Ioanna Beghazi and Dimitris Choulis from the organisation Human Rights Legal Project (HRLP), point out to RSA.

It should be noted that in Samos there has been [recorded](#) a case of illegal and arbitrary detention of eight asylum seekers of Palestinian origin in a police station on the island for a month, when they entered voluntarily to register their asylum request. Among them was a 20-year-old woman who, for 26 days, was held in a cell enclosed by bars — akin to a cage — inside the cell where the seven men were kept.

Shortages of services

RSA spoke with refugees that reported significant shortages of basic goods. *"There is a lack of shoes and soap. Previously, there were volunteers who gave us such items. Now volunteers in Vathy give us these items, but again they are not enough"* points out Samuel* from Sierra Leone, who has been living in the CCAC for several months and is waiting for an answer to his subsequent asylum application³³. *"The decision is ready (...) but they don't tell me anything. The lawyer won't let me know either. I'm very stressed. I don't know what will happen"* he adds.

Of particular concern is the [information](#) of planning to limit the availability of Wi-Fi access to the structure only to persons with a valid International Protection Applicant Card, from the beginning of the year. This would practically mean that access to the internet would not be given to other groups of persons, including those subject to reception and identification procedures, applicants awaiting a preliminary assessment of a subsequent application and those rejected. This measure has not yet been implemented, but if so it would bring an even greater isolation for these groups of residents in the CCAC. *"This is essentially a plan for [mental] exhaustion of these people"* as a member of a group of people who act in solidarity with the refugees characteristically told us.

³³ Interview by telephone on March 17, 2023.

Problems in legal support and medical care

Problems in the access of lawyers within the structure had been observed since the summer and until recently in Samos too, similar to those in Lesbos. Lawyers of the Avocats Sans Frontières, HRLP and I Have Rights organisations who do not work within the CCAC signed a report to the Ombudsman on the problems they face with access to the structure. As lawyers Ioanna Begiazi and Dimitris Choulis from HRLP told RSA, lawyers of these organisations must ask for permission and state the reasons why they want to enter the structure and with whom they want to speak, and they must also have an authorisation from this person. Upon entering the CCAC they have their (political) identities kept, while until recently their lawyers' identities were enough - which should normally allow them to enter any public service³⁴. Further, they are accompanied everywhere by a private security officer (G4S), from November 2022 until today.

According to the UNHCR³⁵, legal support within the structure is provided by METAdrasi with a lawyer, and by PRAKSIS for unaccompanied minors with a part-time lawyer. In addition, there are other legal assistance providers that provide legal assistance without a constant physical presence in the CCAC, namely Avocats Sans Frontières, HRLP and I Have Rights.

In the CCAC of Samos there was no doctor of the National Public Health Organisation in mid-March. A mobile infirmary by Médecins Sans Frontières is located outside the structure. The hospital on the island has no interpreters. An Arabic-language interpreter of the National Public Health Organisation from the CCAC and interpreters from organisations assist the hospital when necessary. Also, according to reports, donated medical devices have not been put into service. As publications report, National Public Health Organisation employees have come to the point of giving money from their own pockets in order to buy medicines for residents who needed them.

³⁴ Article 34 L 4914/2013, FEK A' 208/27.09.2013.

³⁵ Ibid. footnote 13.



Significant shortages of human resources and equipment are also observed in the Samos hospital, with all that this implies for the inhabitants of the island and the residents of the CCAC. There are organisations that were active within the structure, but due to non-registration to the Ministry's Registry, they no longer have access, and offer their services in places outside the CCAC, providing, inter alia, food and clothing.

KOS



Kos CCAC

On the island of Kos arrivals were increased since the end of the year compared to 2021³⁶. According to UNHCR [data](#), between January and April 2, 2023 a total of 493 people arrived on the island. The Closed Controlled Access Centre (CCAC) of Kos is located in an area of about 90 acres, at the site of the former camp "Makrygianni", on a hill in the village of Pyli, 15 kilometres from the city of Kos. The CCAC was inaugurated in November 2021 [despite](#) opposition from local residents and stakeholders against the expansion of the existing structure. It is [designed](#) to run an office infrastructure for around 270 jobs.

³⁶ During 2022, 30% of total arrivals [arrived](#) in the Dodecanese. This is the largest percentage compared to the other islands.



KOS CCAC	
Arrivals January 1 to April 2	620
Nominal capacity	2040
Residents on March 31, 2023	876
Men (%)	59%
Women(%)	19%
Children(%)	22%
Palestine	52%
Democratic Republic of Congo	9%
Cameroon	9%
Somalia	7%
Syria	6%
other	18%
"Safe area" for children - nominal capacity	320
Unaccompanied minors	50
Children residing in the "safe area"	44
Pre-Removal Detention Centre (PROKEKA) - nominal capacity	440
People held on 31/3/2023	37

UNHCR (+weekly snapshot 2/4/2023), Ministry of Migration and Asylum, March 2023, Special Secretariat for the Protection of Unaccompanied Minors in Greece, March 2023 • Demographic data for the Dodecanese are undivided

Kos CCAC	
Distance from the island's urban center (km)	15
Transport ticket cost per person per route (euro)	2,1€
Taxi transport cost (euro)	20€

Based on UNHCR [data](#), on March 31, 2023 there were 443 people living in the CCAC, with a nominal capacity of 2,356. The nationalities of the residents (in Kos and Leros) were from Palestine (52%), the Democratic Republic of Congo (9%), Cameroon (9%), Somalia (7%), Syria (6%) and others (18%), while 59% of them were men, 19% were

women, and 22% were children³⁷. According to the General Secretariat for Asylum Seekers of the Ministry of Migration and Asylum³⁸, on March 9 in the CCAC of Kos there were 53 unaccompanied minors, 34 of whom lived within the "safe area", which has a nominal capacity of 170 children.

According to a recent [publication](#) by Equal Rights Beyond Borders and Terre des Hommes, conditions in the "safe area" for unaccompanied minors are miserable and extremely inadequate, as unaccompanied minors have limited access to schools, recreational or child-friendly activities and are guarded by the security staff at all times. Even very young children and babies separated from their mothers have been brought into the safe area. According to the publication, unaccompanied minors are not allowed to leave the safe area and remain restricted there for the whole duration of their legal procedure, which may take several months. Although there is a basketball court and a net, children sometimes cannot even use it, as the organisations report. *"I was inside the safe area for two months along with other unaccompanied minors. We weren't allowed out of there. There were no activities and the food was of bad quality; we felt like we were in a prison"* says Khaled*, 17 years old, who is living in an space for adults along with his adult cousin who is in charge of his guardianship³⁹.

According to the UNHCR⁴⁰, there is no alternative accommodation other than self-housing in an urban environment on the island.

Volunteers provide Greek courses in places outside the structure. Volunteers also provide clothing and other essentials and try to help with medicines when needed.

As regards the non-formal education of children, based on the ARSIS data⁴¹, in mid-March 70 children, of ages 4-17, attended the Centre for Homework and Creative Activities - KEDU, in Kos, which is part of the programme "All Children in Education". Courses in Greek, English, natural sciences, art, as well as social skills development workshops are provided. According to the UNHCR⁴², based on the most recent data available at the end of March (there may be deviations), approximately

³⁷ According to the UNHCR weekly snapshot for the Dodecanese, as of April 2, 2023.

³⁸ Ibid. footnote 12.

³⁹ Interview in Kos on March 21, 2023.

⁴⁰ Ibid. footnote 13.

⁴¹ Written answer of ARSIS to RSA on March 15, 2023. The programme All Children in Education – ACE is an initiative of UNICEF, co-funded by the European Union, and is implemented by a series of partners, among which is ARSIS – Association for the Social Support of Youth.

⁴² Written answer to RSA on March 23, 2023.

40 children participated in the DYEP classes (Reception Facilities for Refugee Education - in kindergarten, primary and secondary school). Enrollment procedures have been normalised, while the number of children attending DYEP classes has increased.

Small amounts of food and problems of living

Refugees report poor food quality and very small amounts of food and also drinking water⁴³. *“We were given food once a day, and sometimes we received only one orange in the morning. We had reached the point where we were starving,”* says Karim*, a 21-year-old Palestinian who is granted asylum status⁴⁴. According to information provided by organisations working on the island, the catering company provides the three meals of the day (lunch, dinner and next morning's breakfast) in one delivery every day at noon. There are also major shortages in the provision of essential food for children. *“Previously, they were giving us a litre of milk a day for each child, now they give us only a glass of milk for each child; we have not received our monthly allowance and we have no money to buy food”* emphasises Mahmoud* from Palestine, father of a small child⁴⁵.



Communal dining room, which while ready, has not been commissioned

Also, according to residents and organisations' testimonies with whom RSA spoke, the washing machines and communal kitchens, while their construction is completed, are not put into service. There are also reports of shortages in clothes and shoes. *“I arrived in September, and I'm still wearing the same clothes that I arrived with. When we*

⁴³ The information about the small amount of food and water is confirmed by reports that the UNHCR has received from residents of Kos CCAC.

⁴⁴ Interview in Kos on March 22, 2023.

⁴⁵ Interview in Kos on March 22, 2023.

arrived they only gave us soap and a sleeping bag" Ahmed*, a young Palestinian man, told us.

Finally, as is clear from refugees and solidarity groups' testimonies, an extremely urgent housing problem arises for those who are granted international protection status and are forced to immediately leave the structure. They are mostly single men who are actually homeless, trying to either find an emergency solution by living together with several people in the hard-to-find apartments of Kos and looking for a job, or move to another Greek city with the same purpose. *"Most people manage to find a job in the hotels when the [tourist] season starts in late April/early May, in poor working conditions (same as for local workers), mainly because of the exhausting working hours. Until then, they find themselves in a very bad state and even in conditions of homelessness, if they do not manage to find a solution through friends and acquaintances"* a volunteer on the island points out to us.

Reported strict controls resembling imprisonment

Increased surveillance measures are prevalent also in Kos. In particular, the turnstiles with card readers placed in the separate sections of the structure result in certain categories of residents (such as those not registered or those whose asylum request is rejected) having their liberty restricted even within the CCAC, as we were told. There are also bad and dismissive behaviours towards residents and a severe shortage in interpreters, which significantly impedes communication between employees and residents and leads to tensions. Because of the exhaustive controls, many residents avoid leaving the structure at all. Residents told RSA that they had undergone intra-body controls upon their return in the evening to the structure, in search of drugs. In fact, we were told that this control has been implemented to female residents as well, with female police presence. *"We do not have the money to buy food, would we buy drugs?"* says Karim*⁴⁶. We met him in the centre of Kos while he was waiting for his family from Gaza to send him money, in order to buy a ferry ticket and move to the mainland. The presence of the police is particularly intense around the CCAC and also in the city of Kos.

⁴⁶ Interview in Kos on March 22, 2023.



Further, there is tension in the area where the structure is located, with part of the residents and official representatives developing aggressive reflexes. In late March, the president of the Municipality of Pyli, [declared](#) in a publication that the anger of the residents for the whole situation is so great that they tell him that, unless something changes soon, they will take the guns and the law into their own hands.

Next to the CCAC is the Pre-Removal Detention Centre (PROKEKA) with a nominal capacity of 440 people. On March 31, 37 people [were held](#) there. This is the only PROKEKA that operates on the islands of the Eastern Aegean, while transfers are made there from Kos and Leros CCAC. According to the testimonies we collected, the authorities ask newcomers to [destroy the cameras](#) on their mobile phones upon their arrival at the CCAC in order to prevent filming inside the PROKEKA.

Deficiencies in medical care and legal support

At the end of March there was neither a doctor nor a psychologist within the structure. Palestinian refugees told RSA that there are women even in late pregnancy who have not received the necessary medical help. *"My wife is pregnant. (...) We went to the hospital and she had a blood test; when she asked for an ultrasound she was told to go to a private doctor. All we want is for a gynaecologist to see her (...) I don't want her to give birth here (...) Since she hasn't conducted an ultrasound, we don't know exactly what month she is in, we count on ourselves"* a resident in the structure told us⁴⁷.

⁴⁷ Interview in Kos on March 22, 2023.

Staff shortages in the hospital of the island are significant, with all that this entails for the local population and refugees in need of medical care. The fact that Kos' hospital does not have an interpreter makes communication with patients significantly more difficult. Interpretation is extremely inadequate as it is conducted either by a compatriot accompanying the patient, or by another emergency solution. Due to the lack of a psychiatrist in the hospital of Kos, psychiatric cases involving those administratively detained are transferred, with the escort of police and even handcuffed, to the Leros Mental Hospital. In addition, there have been cases where severe psychiatric cases in the reception procedures in the CCAC, instead of being referred, have their "geographical restriction" lifted and are obliged to seek medical care elsewhere on their own.

According to the UNHCR⁴⁸, the organisations METAdrasi, Greek Council for Refugees (GCR) and PRAKSIS provide legal assistance within the CCAC: METAdrasi with two lawyers (one position is currently vacant), GCR with one lawyer and PRAKSIS (providing legal assistance to unaccompanied minors in the "safe area") with another. In addition, Equal Rights Beyond Borders operates in the CCAC with four members.

⁴⁸ Ibid., footnote 16.

LEROS



Leros CCAC

The Closed Controlled Access Centre (CCAC) in Leros is located on an area of about 60 acres in a remote area on a mountainside, about 6 kilometres away from Agia Marina, the capital of the island. The structure was inaugurated in November 2021 despite strong [reactions](#) to its construction from local authorities. For its operation, it is [designed](#) to provide office infrastructure for approximately 300 jobs.

Aside from the direct arrivals, there are also transfers from other islands (Rhodes and Symi), exclusively to Leros.



LEROS CCAC	
Arrivals January 1 to April 2	162
Nominal capacity	1780
Residents on March 31, 2023	258
Men (%)	59%
Women (%)	19%
Children (%)	22%
Palestine	52%
Democratic Republic of Congo	9%
Cameroon	9%
Somalia	7%
Syria	6%
other	18%
"Safe area" for children - nominal capacity	100
Unaccompanied minors	20
Children residing in the "safe area"	18

UNHCR (+weekly snapshot 2/4/2023), Ministry of Migration and Asylum, March 2023, Special Secretariat for the Protection of Unaccompanied Minors in Greece, March 2023 - Demographic data for the Dodecanese are undivided

Leros CCAC	
Distance from the island's urban center (km)	6
Transport ticket cost per person per route (euro)	2€
Taxi transport cost (euro)	13€

According to UNHCR [data](#), from January to April 2, 2023 a total of 162 people arrived on the island. Based on Ministry's of Migration and Asylum [data](#), on March 31, 2023 there were 258 people living in the CCAC, with a nominal capacity of 1,780. The nationalities of the residents (in Kos and Leros) were from Palestine (52%), the Democratic Republic of Congo (9%), Cameroon (9%), Somalia (7%), Syria (6%) and others (18%), while 59% of them were men, 19% were women, and 22% were children⁴⁹. According to the Special Secretariat for the Protection of Unaccompanied Minors of the Ministry for Migration and Asylum⁵⁰, on March 9, 19 unaccompanied minors were in the Leros CCAC, 18 of whom lived within the "safe area", which has a nominal capacity of 100 children.

According to the UNHCR⁵¹, there is no alternative accommodation other than self-housing in an urban environment on the island. Employees in organisations report that those who are granted asylum are called upon by the authorities within a few days to leave the CCAC without an alternative or support mechanism, with the result that, at times, there are even cases of homeless families on the streets of the island.

⁴⁹ According to the UNHCR weekly snapshot for the Dodecanese, as of April 2, 2023.

⁵⁰ Ibid., footnote 15.

⁵¹ Ibid., footnote 16.

Within the CCAC, non-formal education courses for adults are provided by METAdrasi and educational activities for children and parents by ARSIS. ARSIS also runs the Educational Intervention Mobile Unit in Platanos area, LEDU, which provides Greek and English language courses, creative activities and school support to refugee and migrant children of 4-17 years old⁵². In addition, social skills workshops, external activities and psychosocial support are provided to both pupils and parents/guardians. At the beginning of March, 48 children residing in the Leros CCAC were attending courses in LEDU.

According to the UNHCR⁵³, at the end of March, two children attended DYEP classes (Reception Facilities for Refugee Education) in Leros, as the local Refugee Education Coordinator has only recently taken office.

Shortages of basic goods

In Leros there are also serious shortages of basic necessities and delays in the payment of monthly allowances. In the mixed sector, the public laundry and communal kitchens operate, but the shops don't, as employees report. The food is also of poor quality and small quantity, while the catering company provides all three meals of the day once a day. There is a general lack of recreational activities, while unaccompanied minors remain restricted within the safe area without any recreational activities and with substandard psychological support. Food is not allowed to be consumed in the containers and is consumed only in public areas, while there are not enough shading areas for residents. The Citizens' Collectivity still provides clothes, shoes and children's items (nappies, clothes).

According to the UNHCR, at the end of March there were two doctors and a psychologist inside the CCAC. At the local hospital, staff shortages, which make the medical care of all patients problematic, have been repeatedly [denounced](#). The hospital does not have an interpreter. Where necessary, the hospital cooperates with the CCAC to find an interpreter who will perform the interpretation either remotely or in person.

⁵² Written answer of ARSIS to RSA on March 9, 2023. The programme All Children in Education – ACE is an initiative of UNICEF, co-funded by the European Union, and is implemented by a series of partners, among which is ARSIS – Association for the Social Support of Youth.

⁵³ Written answer to RSA on March 23, 2023.

Body controls out of legality

The control and surveillance systems are the same as those in the CCAC of Samos and Leros. In early April, the Union of Employees in the National Public Health Organisation [reported](#) in a statement that employees are being asked to work in different environments than those for which they were hired, and called on them not to accept these conditions either for themselves or for the refugees. The Panhellenic Association of Employees in the Reception and Identification Service also [issued](#) a statement in early April, reporting, inter alia, that the security company's guards carry out a body control on the employees because they refuse to undergo daily radiation fearing the effects on their health; a body control that crosses the line. As employees complain, there is a check even under the underwear, thus violating the dignity of women and men. In their statement, they refer to grotesque situations, as they say that employees are forced to pass through the X-ray control system even food items such as yoghourts, water, etc.; they are then told that they can consume them after an hour, in order to avoid a risk to their health.

Even children are forced to undergo strict controls mainly on entry, such as checks in their school backpacks, while inappropriate behaviour is observed by certain people of the staff in the structure towards the residents.



The entrance of Leros CCAC

Shortcomings in legal assistance

In recent months in Leros, legal assistance is insufficient, as the number of available lawyers is not enough to serve the needs. At the same time, according to information from employees, in some cases there is not even sufficient information about the provision of legal support. According to the UNHCR⁵⁴, METAdrasi started providing legal assistance within the CCAC with one lawyer in February 2023. A UNHCR team from Kos visits Leros three days a week, for providing information to newcomers and residents and on issues related to integration.

****Names have been changed for privacy and security reasons.***

⁵⁴ Ibid., footnote 16.