



New asylum seeker registration procedure begins today and is already at capacity:

People will be forced to remain undocumented for 14 months as they wait for an appointment in Diavata or Malakasa

1st September 2022

The [new online platform](#) for the registration of asylum seekers in Greece was published just six weeks ago with appointments commencing today in Diavata and Malakasa. Yet, Mobile Info Team reports that people are already experiencing significant delays, with appointments being assigned up to 14 months later, or increasingly, not at all due to a 'lack of availability'. We express our serious concern that these delays, combined with the lack of official documentation provided to applicants as they wait, will result in people being forced to live in poor conditions, at risk of pushbacks and without access to essential services.

New electronic platform for first time applicants

On 13 July 2022, the Ministry of Migration and Asylum published a new online platform for the electronic registration of asylum seekers in Greece. The procedure applies for all third country nationals arriving in Greece and wishing to claim asylum, as well as for those already residing in Greece and who have not been through reception and identification procedures.

The platform is available in nine languages (Albanian, Arabic, Bengal, Dari, English, Farsi, Pashto, Turkish and Urdu), with the impending addition of Lingala and Kurmanji, and possibility with further expansion of other languages in the future. The lack of French translation has already proved a barrier for many of Mobile Info Team's community, particularly regarding applicants from the Democratic Republic of the Congo and Cameroon. The platform indicates that applicants should fill in a short electronic form, detailing personal information, including if the applicant already has a police note or passport, though these are not mandatory requirements.

After applicants have provided personal information, they are asked to choose one of two registration facilities; Diavata (Thessaloniki) or Malakasa (Attica). Once the application is finalised, a registration appointment will be assigned to the applicant and communicated via email, with appointments beginning on the 1 September 2022. The appointment process mandates an up to 25-day detention period in order for the procedure to be completed.

Other than a public social media announcement on Twitter and on the Facebook page of the Ministry for Migration and Asylum, the new electronic registration form has been poorly communicated among applicants and actors in Greece. It is telling that the creation of the

platform has not been announced on the Ministry's English Facebook account where information for people-on-the-move in Greece is normally provided. Mobile Info Team has already received requests for support from individuals who have experienced the exploitation of this lack of official information, whereby lawyers charged up to 150 euros to help people to navigate the platform and fill in the application form, which can be completed in 5 to 10 minutes.

One week prior to appointments in Diavata and Malakasa commencing, Mobile Info Team contacted the Reception and Identification Service for clarification on the process, yet received a response indicating that no information could be provided until the Ministry of Migration and Asylum released further guidelines.

Concerns

In our last report, [Blocked from the System](#), we highlighted the major policy changes announced in November 2021 which terminated the Skype pre-registration system on mainland Greece, and analysed the subsequent impacts of extremely limited routes into the asylum system. This resulted in a severe lack of safe and efficient access to international protection, forcing people to remain undocumented for extensive periods of time, without basic medical care, accommodation or essential services.

Whilst we are relieved that a step has been taken to change the eight month long information void and near impossible access to the asylum procedure on mainland Greece, Mobile Info Team expresses a number of concerns regarding the delays and ambiguities that remain unclarified in the new process.

1. Extensive delays in appointments

Mobile Info Team's caseworkers, who are supporting individuals with their application forms, have already witnessed the irregular distribution and extensive delay of appointment dates, with several appointments being assigned as late as November 2023. Mobile Info Team's caseworkers additionally found that some individuals are unable to find any appointments at all, reporting that they were instead presented with a notification stating that there '*are no dates available for this location*'. This raises serious concerns over the utter lack of capacity of the facilities, and without official documentation or legal status, people will already be forced to remain undocumented for over a year. As a result, the issues that existed under the [Skype pre-registration system](#) - and since the policy changes in [November 2021](#) - persist, where people are forced into legal limbo and remain unsupported by appropriate structures to provide for their essential needs.

2. Lack of documentation following electronic registration

Despite third country nationals being considered as 'applicants for international protection' or 'asylum seekers' from the moment that they declare

orally or in writing to any Greek authority that they seek asylum or subsidiary protection (Article 1, 4939/2022), there is no officially recognised documentation that individuals can carry to prove their expression of willingness or registration appointment, if requested to show documentation by the Greek authorities. This puts people at high risk of police apprehension and subsequent detention, or of pushbacks. Mobile Info Team has received many requests from individuals expressing fear of the authorities, specifically asking if the confirmation email from the application form will 'protect them from the police'. In addition, due to such lack of official documentation, the question remains as to whether people will be forced to live without access to material reception conditions whilst they await their appointments, risking homelessness, destitution and physical and mental ill-health.

3. *De facto detention*

Whilst a maximum detention period of 25 days has been a part of reception and identification procedures prior to the publication of the new electronic platform, this continued mandatory detention period reinforces the *de facto* status of detention in asylum procedures in Greece. According to the EU Reception Conditions Directive (RCD), Member States "shall not hold a person in detention for the sole reason that he or she is an applicant for international protection" (Article 8). Article 8 (3) proceeds by stating six reasons under which Member States may detain asylum seekers, including for the verification of their identity, yet a state must still establish that there are 'less coercive measures' available. The new platform utilises detention as the status quo for the registration of an asylum application, violating the RCD's conditions of exceptional implementation. We are extremely concerned that the normalisation of detention in Greek asylum policy diverges considerably from European legislation and fundamental rights of asylum seekers.

4. *Lack of vulnerability screening*

Despite the benefit of the new application form being relatively easy to use and understand, there are concerns that its oversimplified format removes the possibility for specific and complex cases to be examined or fast-tracked. In particular, there is no possibility to attach evidence of an applicant's vulnerabilities, resulting in their applications being examined with delay, likely worsening their situation. As no prioritisation of vulnerable applicants is currently possible and waiting times for an appointment can be more than one year, Mobile Info Team is highly concerned that vulnerable individuals will risk being forced to live in poor conditions, posing direct threats to their mental and physical health. Additionally no screening for Dublin cases is embedded in the platform, which

can result in third country nationals losing their opportunity to go through family reunification procedures under the Dublin regulation.

5. Transport costs

It is the applicant's responsibility to make their way to the assigned Reception and Identification Centre - Malakasa or Diavata - including the financial costs. This, in spite of the Greek Ministry of Infrastructure and Transport [announcing](#) that Ukrainian nationals were entitled to a free KTEL bus ticket to get to and from the Regional Asylum Office earlier in 2022. The [dual treatment](#) of applicants reminds us of the exclusive and hierarchical asylum system in Greece, resulting in an increased risk for certain individuals to miss their registration appointments and consequently their access to international protection.

As registration appointments begin, Mobile Info Team will remain vigilant to the actions of the Greek authorities, particularly focusing on the lack of access to the asylum system and the resultant conditions that individuals are forced to live in. We will continue to monitor the situation as it develops to ensure that fundamental rights are upheld.

We recommend that Greece acts urgently to ensure fair and efficient access to the asylum procedure for all, by:

- A. Increasing the capacity of Reception and Identification Centres to guarantee that there are sufficient appointments available to ensure that people are able to access international protection systems quickly.
- B. Providing individuals with official documentation once they have filled in the online application form, to ensure that their status as applicants of international protection is respected and that they are provided with material reception conditions immediately.
- C. Covering transportation costs to Diavata and Malakasa to ensure that all applicants are able to attend their appointments promptly and without financial burden.
- D. Establish a fast-track procedure for individuals with vulnerabilities or Dublin family reunification claims to ensure that applicants with special reception needs benefit from additional safeguards as soon as possible and that family reunifications under the Dublin procedure are not hindered.