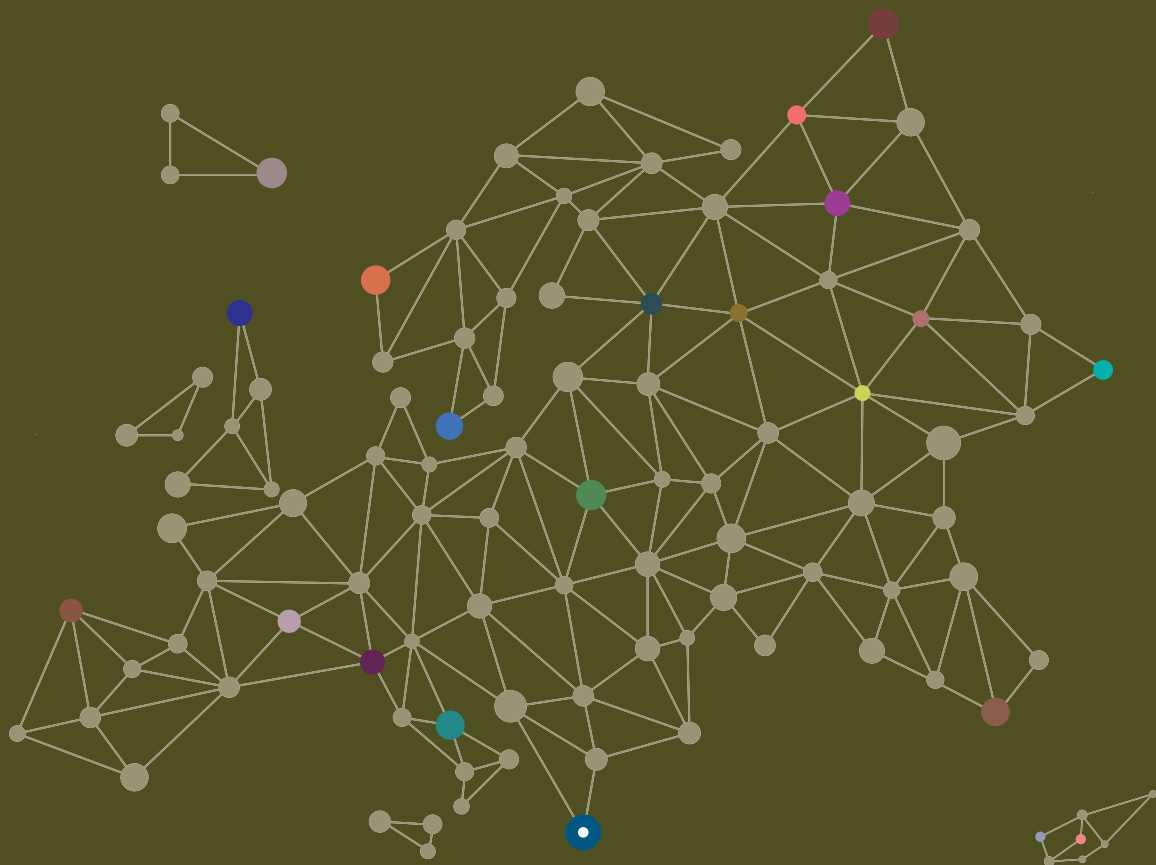


ANNUAL REPORT 2018

The Greek Ombudsman



Executive Summary



ANNUAL REPORT 2018

THE GREEK OMBUDSMAN

Executive Summary



ANNUAL REPORT GROUP 2018

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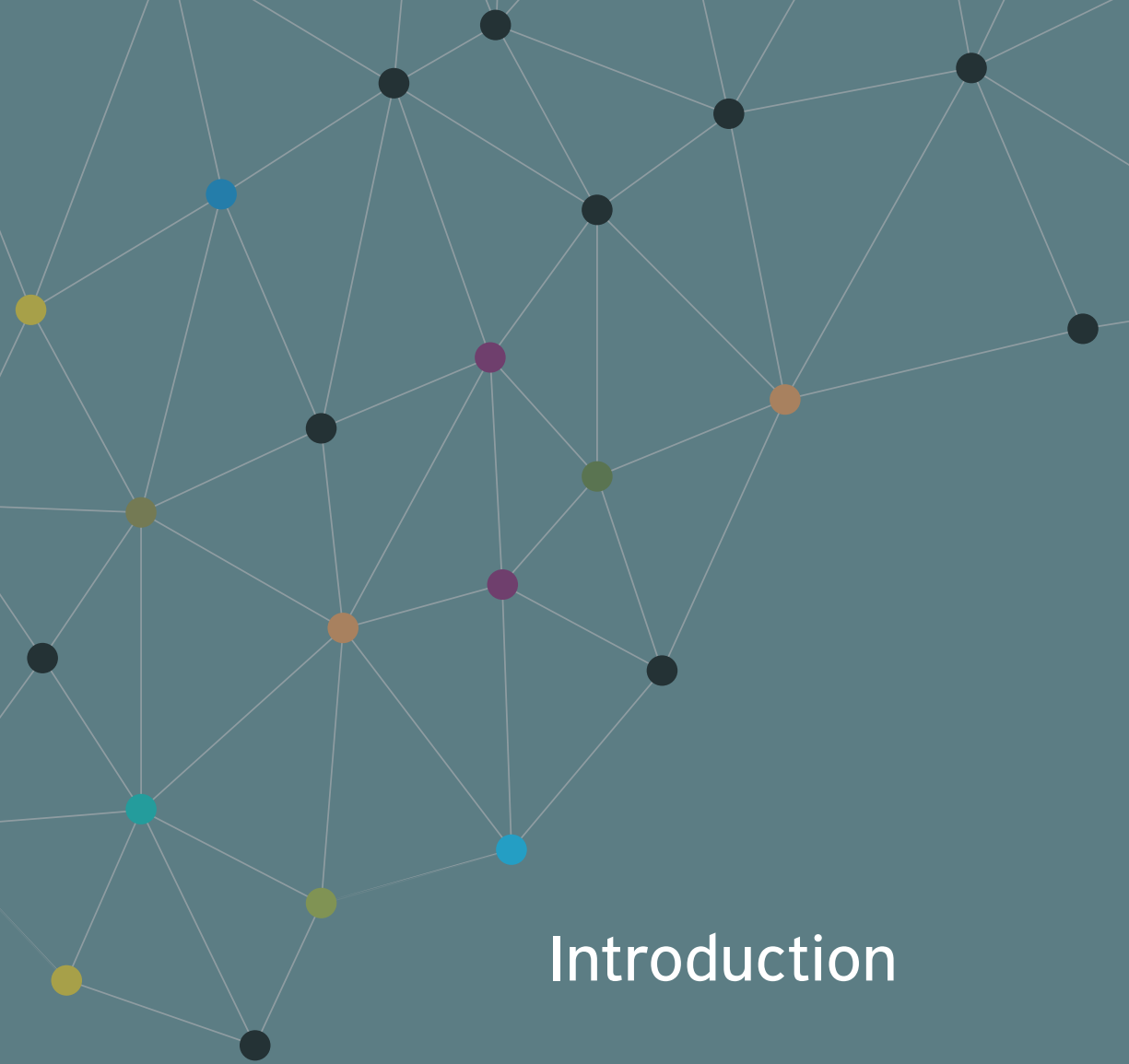
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Introduction

INTRODUCTION —

VALUATING THIS YEAR

2018 was a landmark year. For society, the economy, public administration, the Independent Authority itself.

The end of the fiscal adjustment programmes and the accompanying institutional reforms mark the passage to the next era, that of economic reconstruction, of mitigation of social inequalities and injustices, of the upgrading of the State's administrative structures.



The fight to safeguard citizen's rights, consolidate the rule of law, upgrade the administrative function is continuous, even in the most advanced democracies. In the last decade in our country, this endeavour became more intense, more relevant, more pressing.

In the past decade, Greece was found at the epicentre of two parallel, decisive, existential crises for the cohesion of the whole of Europe as an economic and political entity. Both the economic-fiscal crisis and the crisis in the management of the migration and refugee phenomenon leave the Union deeply wounded and its Member States bewildered. The difficult challenge of the effectiveness of European and national institutions and policies sparked the secessionist rhetoric. Alas, recently this rhetoric has gained substance and content.

The Greek society as well as the national economy and administration have been tested as never before in peace-time. Greece had had and still has the unfortunate privilege to be a testing ground for crisis management policies. This was and still is largely the case for the economic and fiscal crisis. This continues to be the case for the management of population flows.

The effects on the state, on the efficiency of the administration, on the quality of services provided and subsequently on the social cohesion and justice were felt everywhere at the European continent, particularly in Greece. The State was forced to shrink its social benefits policy and reduce its supervisory role. As a natural consequence, rights, whether individual, political or social were excessively squeezed, the welfare state shrank severely, the capacity of the State to achieve sustainable and balanced economic growth was dramatically reduced, social cohesion was disrupted, social opposition and resistance rose to a dangerous level for modern liberal democracies.

Public administration, especially in the last ten years, during the major budgetary, economic and social crisis, has been called to align with successive reforms, many of which remained unfinished or proved ineffective. It has experienced sudden and often ill-considered changes and restructuring, with an overwhelming reduction in staff and resources. As a matter of course, its effectiveness remained at stagnant levels, or even took a downward trend, the quality of the services provided is lower than expected, while at the same time the demands it is called upon to address have increased.

In this challenging environment, the explosion of mixed population flows, refugees and immigrants, who hit Europe's door, found the state mechanisms and political organisations, at national and European level, inexcusably unprepared. After the initial denial to acknowledge the issue, came the embarrassment vis-à-vis the massiveness of the phenomenon and, then, the attempts to manage it, when the flows of the displaced people were stabilised.

The challenges have been and still are numerous.

For the administration, the fair examination of applications for international protection of third-country nationals, the formulation of effective and comprehensive programmes to integrate these populations into the social and economic life.

For the political class, both at EU and Member State level, the development of a Joint Action Plan, a coherent policy for managing mixed flows, respecting fundamental rights and the rule of law.

The resilience of society, any society, in front of the management of such major challenges, could only be at the limits of its breaking point. The danger of a society in confusion includes becoming disoriented, the risk of manipulation of the public opinion, the strengthening of discrimination between 'us' and 'the others', the bolstering of hate speech, xenophobia, and racism is present.

Modern challenges in the state, society, economy and human rights are challenges faced by the institution of the Ombudsman itself; in order to remain relevant and useful, to be modern, effective and efficient, and to monitor changes in the state, administration, society, economy, everyday life, and to be able to meet such contemporary challenges, the institution must seek new institutional tools, ask for solid legal status, ensure its operational completeness and further defend its independence.

For the Ombudsman, 2018 marked the completion of 20 years of operation of the Independent Authority. An institution that was born in countries with high standards of public administration, providing services of high quality, not the opposite. In countries with a long tradition of accountability and transparency in public life. It is an institution which was introduced into the institutional architecture of the Greek State with considerable delay in relation to the other EU Member States of the time. This delay vis-a-vis other European States should be recognised as a symptom of the unwillingness of the political body and the system of governance of the country to accept a new, external and independent level of scrutiny, parallel and often complementary to judicial, administrative and parliamentary control.

Since the Authority's first years of operation, citizens have turned to the Ombudsman in hundreds of thousands in order to curb the adverse effects on their rights, standards of living, daily lives and future plans for their personal, family and social life against the dysfunctions or even arbitrariness of the administration.

Already, more than one million citizens have sought the services of the Ombuds-

man, asking for its mediation in order to resolve a problem, to intervene to remedy an injustice, to highlight and address a systemic malfunction. Separate reports filed with the Authority have exceeded 250.000. Many of them do not, in fact, relate to isolated, individual problems seeking resolution, but to issues involving large population groups, social groups, professional associations, economic activities. In defence of rights and freedoms; for the protection of the environment, urban, natural and cultural, of individual property, of the country's energy resources, of health, of welfare benefits, of all levels of education, of employment, of children and senior citizens.

Since its establishment, the Ombudsman followed the model of its peer institutions, i.e. the combination of the mandate to intervene in resolving unwelcome incidents in public administration services with that of defending and safeguarding the rights of all residents of the territory, through a broad framework of competences.

This selection has marked the Ombudsman's philosophy ever since. Within this 20-year period of the Independent Authority, its competences in the field of protection of rights have widened considerably. The Ombudsman became responsible for the promotion and protection of the rights of minors; subsequently it became the country's Equality Body combating all forms of discrimination in all areas of action, individual and collective, and in administration, the labour market and society.

In parallel, mediation, scrutiny and the ever-widening operational competences and actions of the Authority have been used to monitor the implementation of the country's international obligations to the level of protection of fundamental rights and freedoms, but also to transparent and efficient administration and governance. In recent years, the Ombudsman was nominated as:

- National Mechanism for the external monitoring of forced returns of third country nationals on the basis of the EU Returns Directive, with the task of monitoring the respect of legality of procedures and the respect of fundamental rights of returnees during the operations;
- A privileged institutional interlocutor with the legislative and executive powers, highlighting the rules and principles of good law-making as established at EU level and transposed into the Hellenic legal order, and contributing to improving the quality of the legislative and regulatory framework with keynote and valuable recommendations, indications, proposals and evaluations —ex post and ex ante— of political and legislative initiatives;
- National Mechanism for the prevention of torture and other cruel, inhuman or degrading treatment or punishment, on the basis of the relevant UN Protocol, on the supervision of living conditions and respect for the fundamental rights of those who are deprived of their full liberty;
- National framework for the promotion of the rights of PWDs, as recognised by the UN Convention, to monitor the implementation at national level of the provisions of the International Convention and to actively promote positive anti-discrimination policies;
- National Mechanism for investigating cases of arbitrary behaviour by the law enforcement agencies and staff of state penitentiaries, to enhance the quality of disciplinary control and monitor compliance with the case law of the ECtHR.

This report highlights this progressive strengthening of the Ombudsman's role in the protection of the rule of law and the defence of fundamental rights.

In recent years, the years of the acute fiscal, economic and social crisis, which have severely reduced rights and living standards, we have been striving to secure our citizens' income. Specifically, in the past year, we managed to achieve decrease of deductions, taxes and fees, and reimbursement of retained or confiscated amounts. With continuous and persistent mediation and institutional interventions, we persuaded the administration to take a series of measures and decisions, inter alia, to protect the unseizable limit in bank accounts and the unseizability of welfare benefits, health insurance contributions and contributory municipal fees. At the same time, we have acted decisively to protect the natural and living environment, to consolidate the principle of equal treatment in all areas of human action and social organisation, to eliminate discrimination on grounds of origin, beliefs, gender, sexual orientation, to implement positive policies to tackle discrimination against the most vulnerable groups, the economically and socially "marginalised", people with disabilities, the unemployed, former and current prisoners, immigrants, to guarantee the rights of patients/recipients of health services, to ensure the level of quality of the services provided to children, refugees and asylum seekers, to effectively and efficiently control and restrict arbitrariness by the staff engaged in law enforcement, detention facilities and state penitentiaries. This was done to achieve more widespread transparency, more measurable efficiency, more comprehensive and effective accountability, and to reach a level of democratic governance that is appropriate for an EU Member State.

At the dawn of the third decade of the institution, we are proud of what we have achieved, all the institutional changes we have provoked, all systemic problems we have resolved. This gives us the necessary confidence to continue with the same intensity and perseverance.

Of course, we are not filled with self-complacency. We are working towards improving our own services. We seek new, more effective institutional tools, fewer restrictions in our action, on the margins of our interventions; we aim at developing even broader and more effective channels of communication with society and with economic sector; we strive to come closer to the citizen, by strengthening our openness, insisting on transparency of our actions and ensuring the widespread publicity of our interventions.

New, modern challenges, diverse and multi-level ones come on top of existing ones. The transition to the 'post-memoranda era' of the new 'normality' is a huge challenge in itself.

Committed to defending fundamental rights and freedoms, the rule of law, social cohesion and balanced and sustainable growth, we are preparing for the challenges of the new era. With accumulated experience and know-how. With conviction that we can make a decisive contribution to ensuring transparent, lawful, efficient and democratic administrative action. For a fairer State, for a more humane society.

Andreas I. Pottakis
The Greek Ombudsman

2018 ANNUAL REPORT OF THE OMBUDSMAN

In October 1998, the Greek Ombudsman started to operate and introduced an innovative institution both to Greek society, to which it also addressed, as well as to public administration, its primary interlocutor. Its aim was, by implementing its legislative framework, to suggest and establish a new administrative culture, using mediation as its main vigorous tool.

Mediation, as a means of addressing small and larger administrative disputes and resolving simple and complex problems that tormented the everyday life of citizens, was outside the sphere of action of the administration. The attitude of civil services, restricted either by their commitment to the legislation in force or by the inflexibility of the bureaucratic structure, dealt with citizens' problems by swaying back and forth between the unresolved issues, the lengthy, burdensome operations and the desperately insulting regime of the inefficient services.

In the twenty years we operated, the Ombudsman has not overturned logic and practices deeply rooted in the existing structure of the civil service. It has not been ground-breaking and disruptive. However, it has been established as a calm force in the eyes of the citizens, persistent and interventive, seeking consent and offering innovative suggestions, ideas and practices, many of which, adopted by the administrative mechanism, facilitated Greek society, solved chronic situations, but mainly addressed the personal problem of the citizen who had entrusted us with his/her individual complaint.

The annual reports of past years enabled the Authority to highlight the major problems of legality being violated by the administration, to highlight the way in which mediation is pursued and to reflect the results of its action. However, they have also made it possible to highlight the Ombudsman's institutional role as a legislative and functionally independent authority with clear guarantees for autonomous, self-sufficient and successful action.

The development of this aspect of the Authority has enabled it to emerge as a partner of international organisations, global institutions and bodies, which have recognised it as a secure guarantor of international conventions, a human rights defender and a reliable interlocutor with knowledge, extroversion and acceptance of the new challenges facing international society.

These challenges, which are mostly related to the recognition and protection of human rights, have led to the thematic dossier of this Annual Report. Without neglecting

its initial and substantive mediation order, the Ombudsman is turning to the gloomy social reality of the defence of human rights. It highlights its role in the management of the refugee issue, the issues of irregular migrants and the protection of children. The Ombudsman embraces people with disabilities and remains vigilant for their rights, controls cruel, inhuman or degrading treatment, investigates cases of arbitrariness of the law enforcement authorities, depicts the status of prisons and prisoners and becomes the competent body responsible for monitoring and promoting the implementation of equal treatment in the Hellenic legal order.

With the certainty that these social issues, which are serious and difficult, have been effectively addressed by the Greek Ombudsman during the previous year, we submit the evaluation of the year as a legacy of good management and a challenge of solidification and smooth operation.

The Central Editorial Team

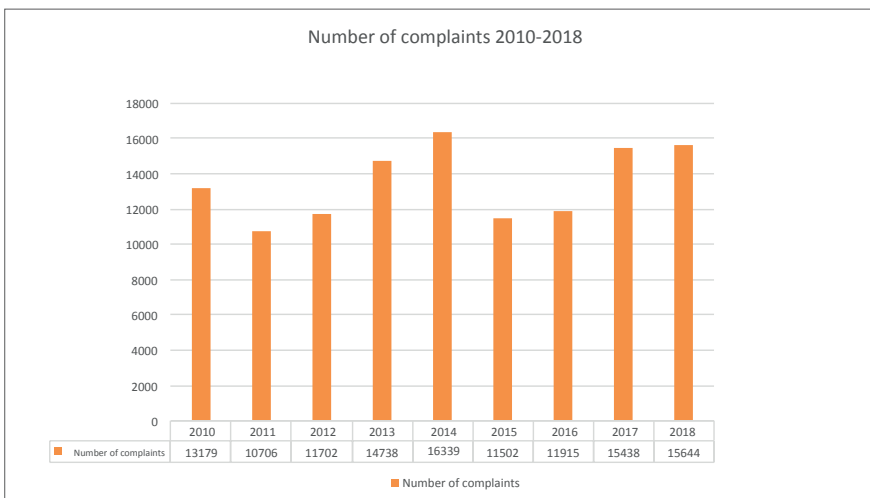
THE STATISTICAL OUTLINE OF THE YEAR

THE PICTURE OF THE PROBLEMS IN THE RELATIONS BETWEEN PUBLIC ADMINISTRATION AND CITIZENS, THROUGH THE COMPLAINTS FILED WITH THE OMBUDSMAN IN 2018.

1. Number of complaints and thematic categories

The number of complaints to the Ombudsman remains high and continues to increase this year too. The increase from 2017 is marginal (around 1 %), but over the last four years, the number of complaints grew by 36 %, from 11.502 in 2015 to 15.644 in 2018. In addition, the complaints of this four-year period represent 45 % of the total number of complaints since 2010 and one-quarter of the complaints submitted in the 20 years of operation of the Authority (see Graph 1).

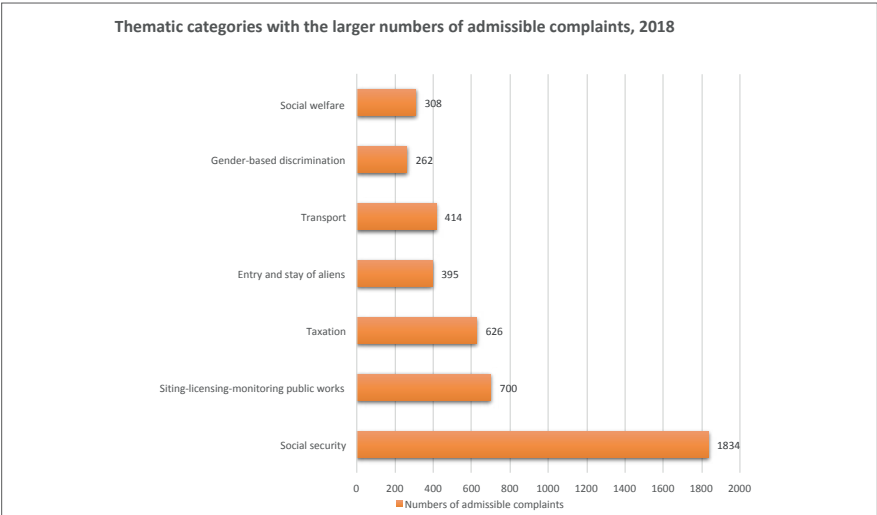
GRAPH 1



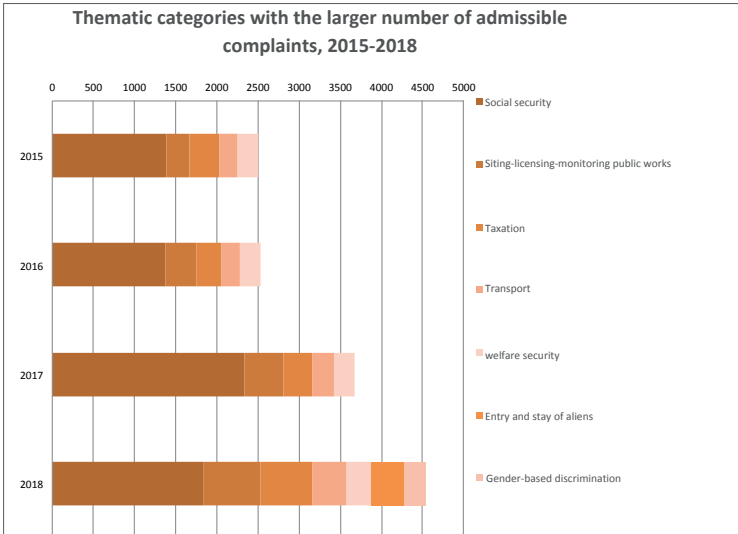
Looking at the breakdown into subtopics of the complaints investigated by the Ombudsman, which were found to be within competence and contained indications of

some form of maladministration, we observe that the five main categories in terms of number show a remarkable stability over time (see Graphs 2 and 2a).

GRAPH 2



GRAPH 2A



Social security issues systematically represent the majority of the admissible complaints submitted to the Authority, although they have reduced in the recent years, possibly as a result of the “stabilisation” of the relevant legislation. On a consistent basis, issues related to the “siting — licensing and monitoring of construction works” follow, including problems with the Public Utility Companies (PPC, EYDAP, DEYA). Taxation issues make

up the third largest group of issues investigated by the Ombudsman, although it showed a slight decline in recent years an increasing trend is present this year. This increase may be due to the problems created by the new framework regulation concerning the housing allowance for students as well as the customs clearance procedure for ELTA's incoming mail. At the same time, problems related to the attachment of bank accounts¹ for public debts still persist. Finally, the issues of transport and social welfare steadily appear in the foremost problems to be solved by the Authority. It is worth noting that in 2018 two new categories appear to have a significant number of complaints, namely the issues of entry and residence of aliens and their civil status in general, as well as gender discrimination; the former reflects the outbreak of the refugee crisis and the latter reflects the systematisation of the Authority's intervention through the creation of the Equal Treatment Department in 2016.

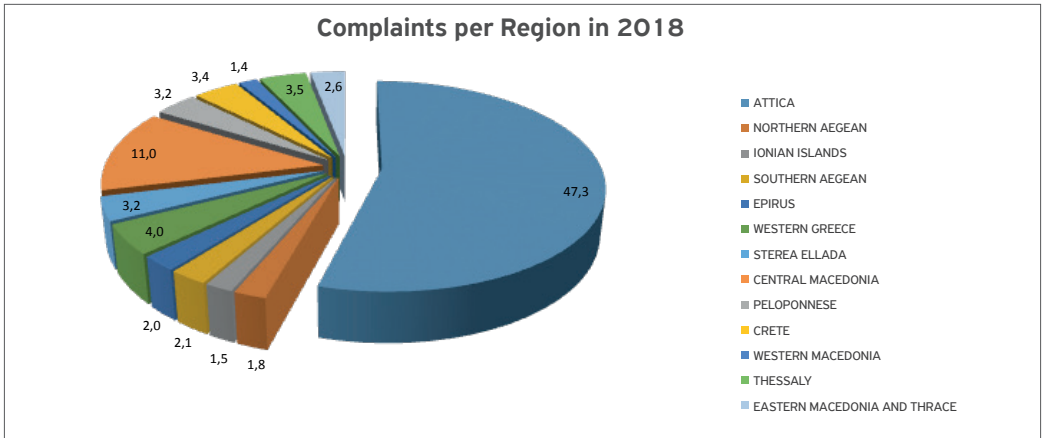
Particular reference should be made to the increasing trend that remains noticeable, due to the persistent importance of these main thematic categories, in which the highest number of complaints is concentrated. Until 2015, the percentage that these topics represented did not exceed 50 % of the total number of admissible complaints to the Authority. In the last three years, however, it is more than half the total number of complaints and reaches 55 % in 2018. The continuing "systemic nature" of these problems, which has repeatedly been highlighted and analysed in the Authority's Annual Reports in the past, shows that, in spite of any "reform efforts", they continue to form the heart of maladministration and the backbone of the problems of citizens' daily lives.

2. Geographical distribution and seasonality of complains

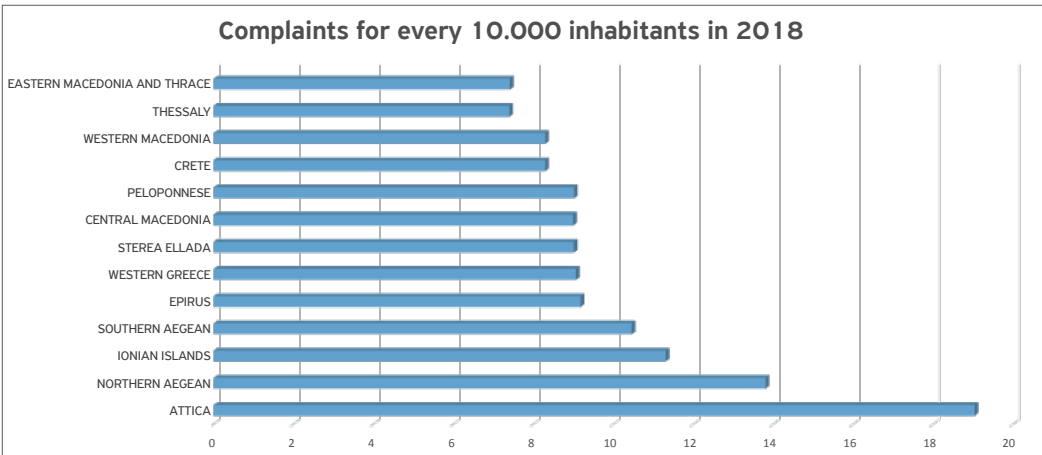
The geographical distribution of complaints investigated by the Authority in 2018 does not change the picture of recent years, as the effects of the financial crisis continue to spread even outside major urban centres. Thus, in 2018, with the exception of the inhabitants of Attica, the inhabitants of the Aegean and Ionian islands address the Ombudsman in larger numbers, by analogy, than residents in other regions of the country with a greater number of inhabitants and other urban areas (see Graphs 3 and 3a).

1 <https://www.synigoros.gr/?i=state-citizen-relations.en.recentinterventions.539635>

GRAPH 3



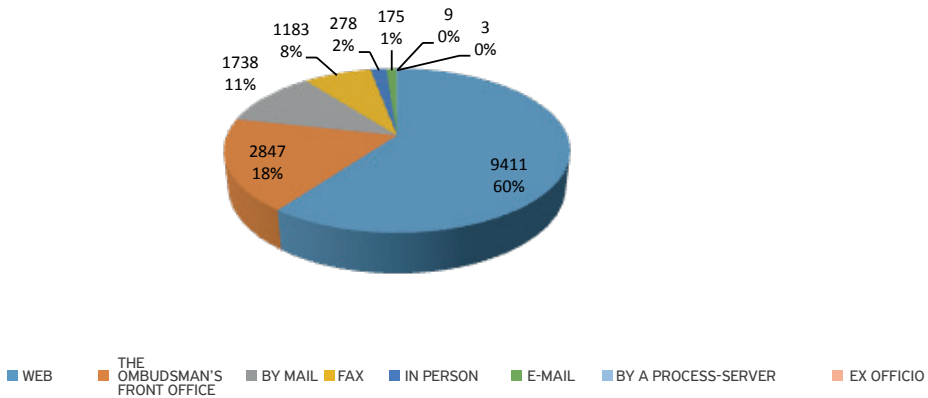
GRAPH 3A



However, for one more year, Attica's dominance is unaffected. The use of electronic and distance filing channels (Authority's website and fax) are growing and increasing (68 % of 2018 complaints were filed in this way). It is noteworthy, however, that there is a significant influx of citizens in the Authority's front office to get information and update on how to deal with their problems and, ultimately, to submit complaints, which is up to 20 % of the total (see Graph 4).

GRAPH 4

Breakdown of Complaints based on the way they were filed -
Total of complaints 15.438



3. Website traffic — Social networks — Telephone centre

In addition, in the context of the digitised communication of the Authority with the citizens, the number of visits to the Ombudsman's website is recorded as well as the response to social media posts. We also record the service of citizens through the call centre.

GRAPH 5

synigoros.gr (1/1/2018 - 31/12/2018)	
Single visitors	312.403 (+4,40% vs. 2017)
Page views	1.438.117 (+4,44% vs. 2017)
SOURCES OF FREQUENT VISITORS	
Search engines (81,71%)	Direct access (9,79%)
Websites and referrals (6,25%)	Social media (2,25%)

Analysis of access technologies	
Computer access (67,42%)	Smartphone access (27,56%)
Tablet access (5,02%)	

synigoros-solidarity.gr (1/1/2018 - 31/12/2018)	
Number of single visitors	74.769 (+24,81% vs. 2017)
Page views	248.183 (+26,3% vs. 2017)
SOURCES OF FREQUENT VISITORS	
Search engines (76,26%)	Direct access (19,59%)
Websites and referrals (2,7%)	Social media (1,45%)

THE MOST VISITED POSTS

1. Provision of free legal assistance
2. Vulnerable groups
3. Allowance or increase in pension due to total disability
4. Certification of disability
5. Loans by the Workers' Housing Organization
6. Severe disability allowance
7. Electronic request for examination by the Centres for Disability Certification
8. Specific disability benefits
9. Pensions of uninsured elderly
10. Admission to higher education for people suffering from serious conditions

Analysis of access technologies (computers, smartphones, mobile)
Computer access (54,64%)
Smartphone access (37,81%)
Tablet access (7,55%)
SOCIAL MEDIA (1/1/2018 – 31/12/2018)
Facebook (/synigoros)
Single users who <i>LIKED</i> the official profile/members of the public profile of the Authority at the end of 2018
18.270 (+7,25% since early 2018)
Twitter (@synigoros)
Single users who follow/followers of the public profile of the Authority at the end of 2018
5.700 (+7,24% since early 2018)

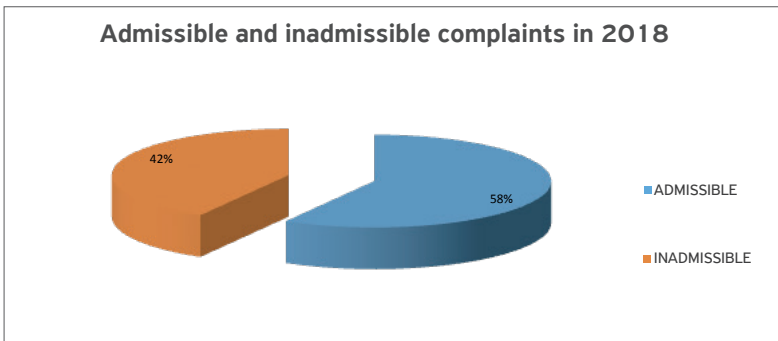
OPERATION OF THE AUTHORITY'S TELEPHONE CENTRE

	Calls received	Replied:
January 2018	5360	2627
February 2018	4744	2372
March 2018	5188	2858
April 2018	4061	2072
May 2018	5245	2733
June 2018	5147	2591
July 2018	5467	2448
August 2018	4350	1894
September 2018	4806	2615
October 2018	6122	2772
November 2018	5459	2815
December 2018	4060	2050
TOTAL	60009	29847

4. Inadmissible complains and efficiency of mediation

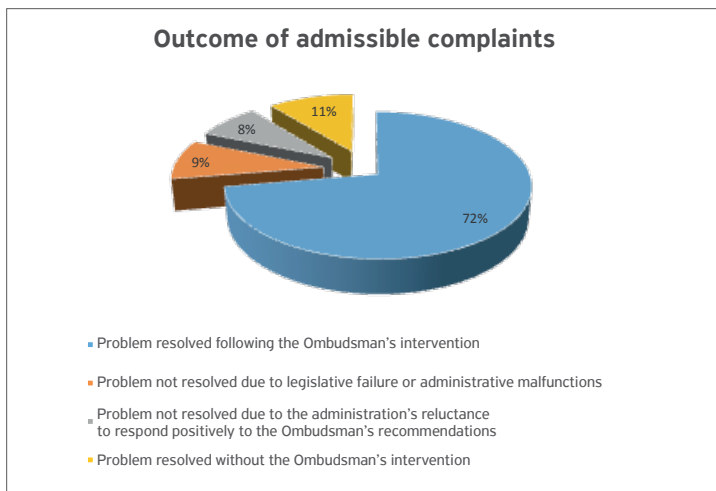
The number of complaints submitted to the Greek Ombudsman each year are several times more than those actually investigated and those with evidence of some form of maladministration is found in an even lesser number of them. Graph 6 shows that for 2018 the percentage of complaints within the Authority's competence, which closed (the Authority's mediation effort has been completed) in the current year, irrespective of the date of their submission, was 58 %.

GRAPH 6



The available data record the efficiency of the Ombudsman's mediation over time, which is now stabilised at an extremely high level, with 72 % of the admissible complaints being positively resolved for the citizens (see Graph 7). Conversely, the administration's failure to respond to the Authority's proposals appears to be significantly higher than other years (8 % from 4 % in 2017), while the inability to resolve the problem (9 %) due to the legislative gaps and organisational problems of the administration remains stable.

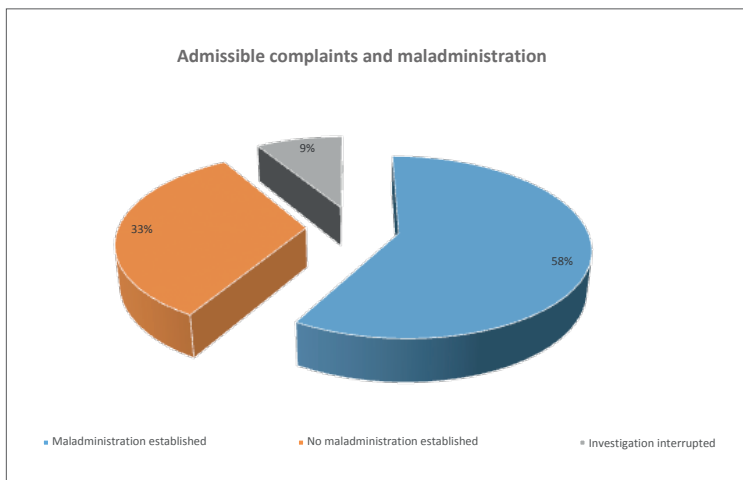
GRAPH 7



5. The “x-ray” of maladministration

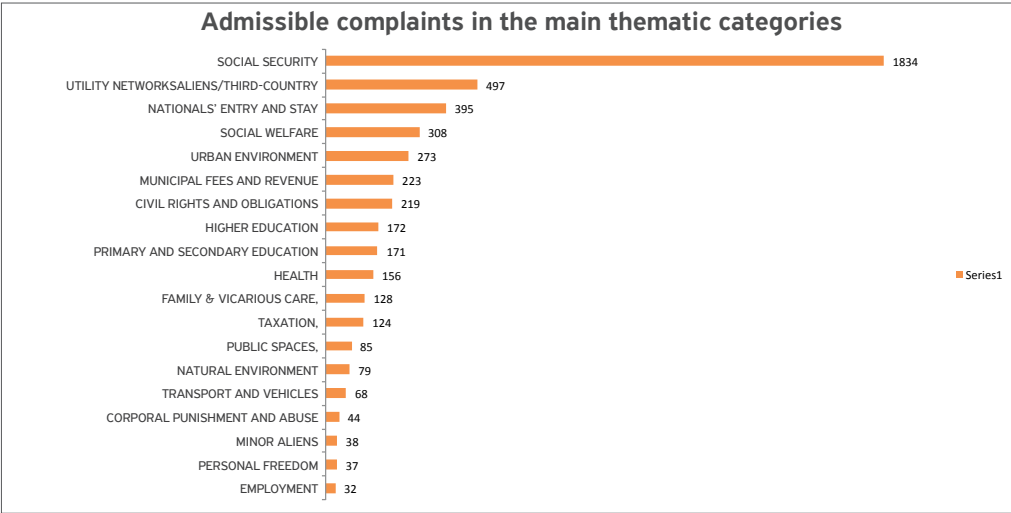
The fight against and the resolution of the phenomena of maladministration is the main mission of the Authority. This section presents quantitative data relating to the admissible complaints that have been filed over time with the Ombudsman and for which the investigation was completed in 2018. The analysis of these data in the following graphs shows the distribution of complaints in more detailed thematic categories and agencies where most problems were identified during the investigation. At the aggregate level, out of all the admissible complaints filed in 2018, there was a problem of maladministration in 58 % of cases (see Graph 8), which has been stable over the last few years.

GRAPH 8



The investigation of the special thematic categories for the period 2015-2018 confirms and specifies that the main cases of maladministration are recorded in the areas of the welfare state, utilities, education (all levels), the services provided by local government and the residential and natural environment. A particularly important finding of the examination of these specific categories is the significant number of complaints that focus on human rights and the problems of the refugee issue (see Graph 9). Together, these two categories represent around 13 % of the complaints of these special categories. It is noted here that the Authority prepared and made public in 2017 two related special reports, mentioned in the relevant chapters of the Annual Report.

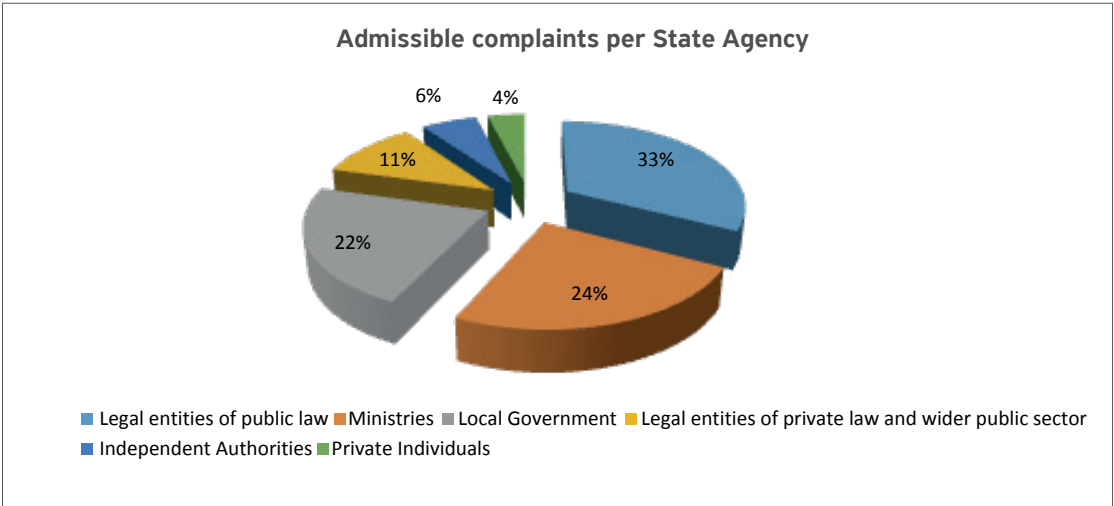
GRAPH 9



6. State agencies and maladministration

Maladministration is found in different state agencies such as: (a) ministries, (b) municipal and regional local authorities, and (c) legal entities of public law and other bodies supervised by the Central Government, as follows:

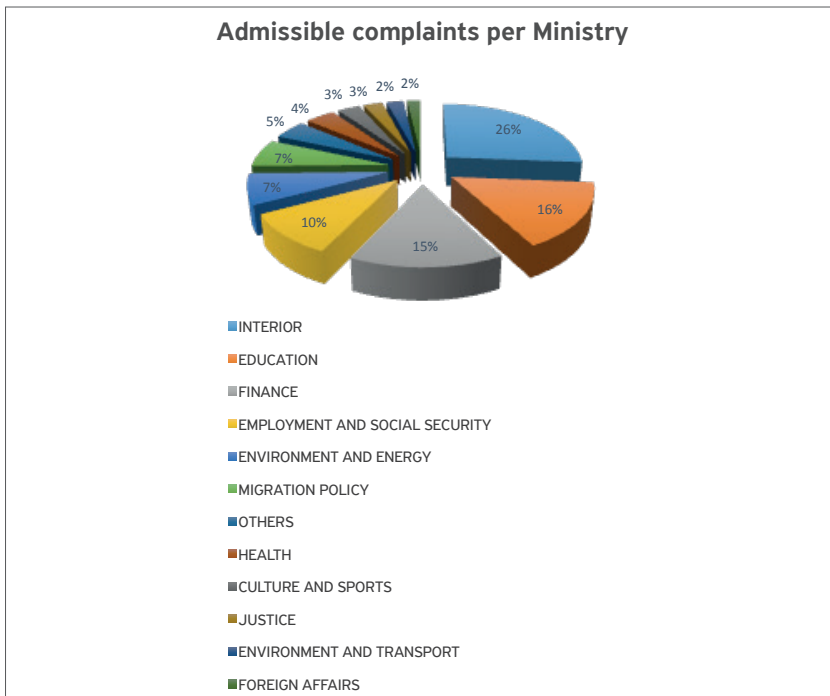
GRAPH 10



a) Ministries

Ministries accrue around 24 % of maladministration detected in complaints closed in 2018. In particular, the Ministry of Interior has the highest number of complaints where maladministration has been found, given its competence in the area of local government. The Ministries of Education, Research and Religious Affairs, Finance, Labour, Social Security and Social Solidarity, Environment and Energy, and Migration Policy follow (see Graph 11).

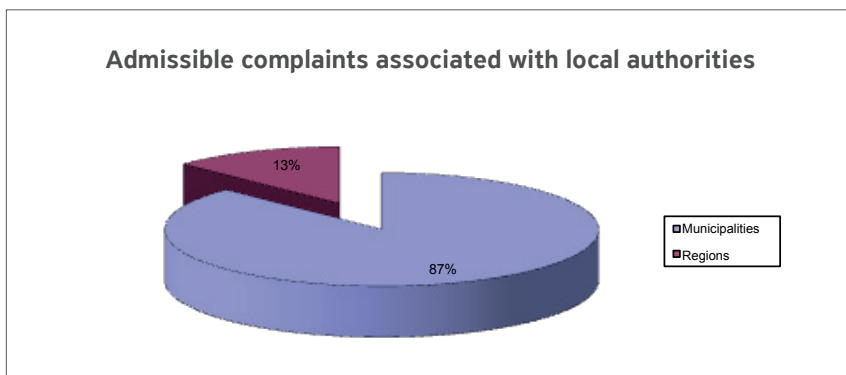
GRAPH 11



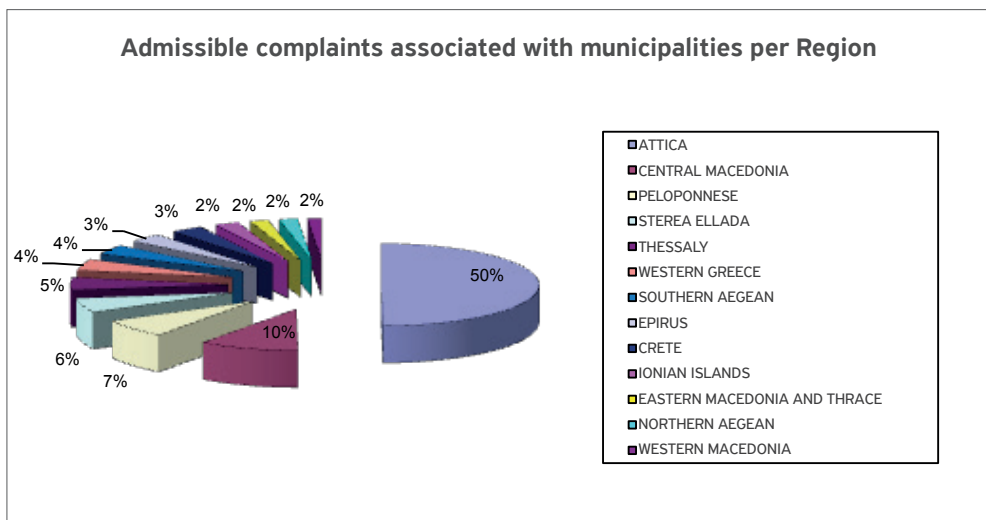
b) Local Authorities

Local authorities accumulate around 22 % of maladministration detected in complaints closed in 2018. The majority of cases of maladministration relate to the municipal authorities (87 % of the admissible complaints). Indeed, most of the issues touching citizens' everyday life have now been transferred to the municipalities, and, as we have seen above, they include a large part of the thematic categories in which the admissible complaints are allocated, such as the municipal fees, urban planning interventions in public spaces, etc., issues that the Authority has highlighted in its recent Special Report on “Revenues of Municipalities and Rule of Law” (see Graphs 12, 12A, 12B).

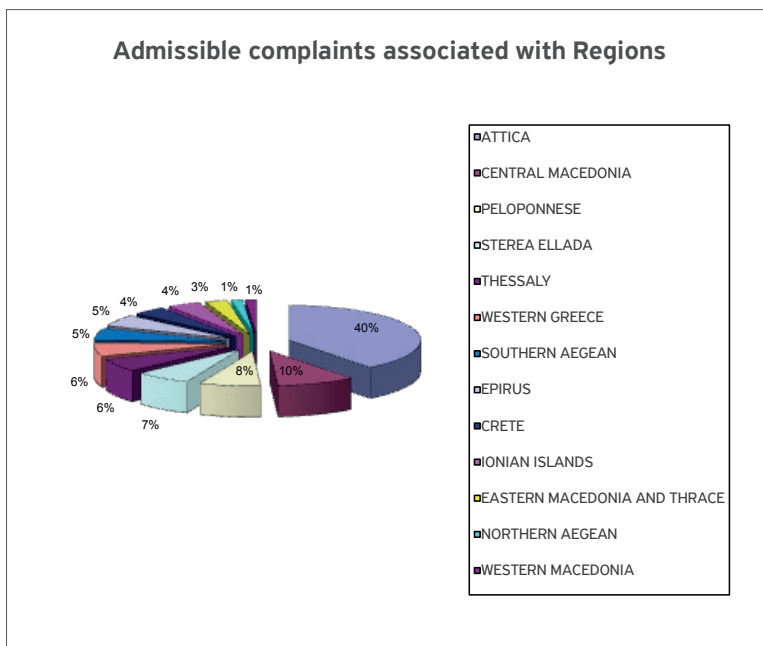
GRAPH 12



GRAPH 12A



GRAPH 12B



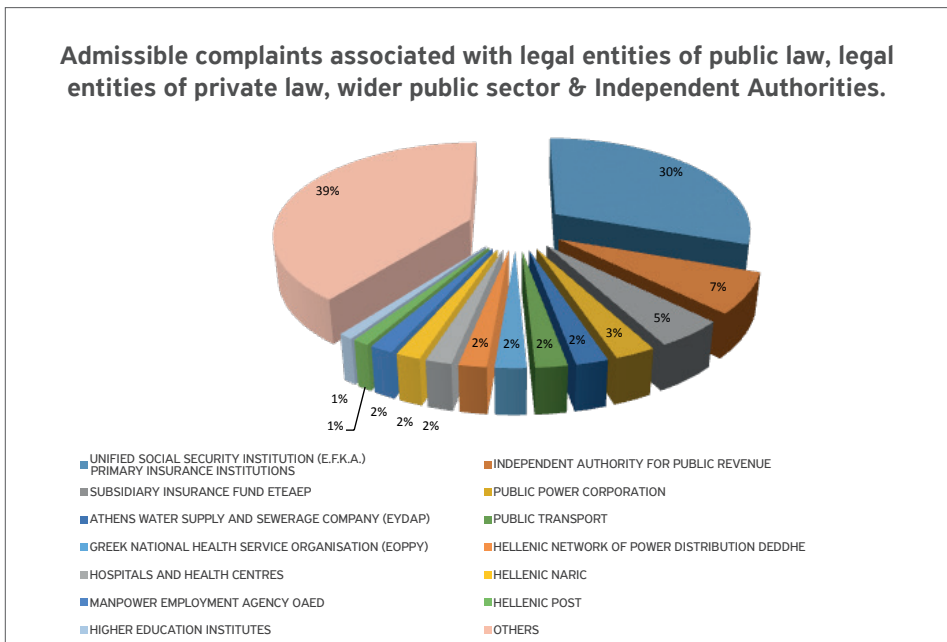
The geography of maladministration in the municipalities of the country reflects, as expected, primarily the distribution of the population in the major urban centres (Athens, Thessaloniki, Patras). This is also the case with regard to the geographical concentration of maladministration in regional authorities. Once again, the shortcomings and vulnerabilities of the so-called “democracy cell” in terms of the structure, staffing and funding of local authorities, which are called upon every day to provide a significant number of services and resolve critical problems, many of which often go beyond their competences and capabilities came to light. These weaknesses of local services reinforce the so-called “exclusion” of the inhabitants of the region, thus acting cumulatively with the already difficult conditions of social exclusion of vulnerable groups of the population.

c) Legal entities of public law

The bulk of complaints in the investigation of which maladministration was detected is concentrated on legal entities of public law (32 %), and in particular once again on those directly related to social security and welfare, the dominant thematic category in complaints for the last years. In particular, EFKA, ETEAEP and EOPYY accumulate almost 62 % of the complaints during the investigation of which maladministration was found. An increasing trend in maladministration is also shown in the complains regarding taxation, as mentioned above, and this is reflected in the admissible complaints concerning the Independent Authority for Public Revenue (IAPR) (11 %) (see Graph 13).

Finally, the problems identified in public utilities (PPC-DEDDIE, EYDAP, ELTA) also show a stability of complaints over time.

GRAPH 13



Instead of conclusions

The invariably high number of complaints lodged with the Authority reinforces the findings of the Ombudsman that serious interventions are imperative in the areas which have been gravely affected in the years of the financial crisis. There has been an intense change in the daily life of citizens. The return to pre-crisis “normality” will require substantial reforms in many critical administrative areas, which continue to

show “systemic” dysfunctions, which in a number of cases reveal severe forms of maladministration. ●



THE **OMBUDSMAN** AS GUARANTOR
OF LEGALITY AND DEFENDER OF
FUNDAMENTAL RIGHTS IN THE
FRAMEWORK OF INTERNATIONAL AND EU
COMMITMENTS OF THE COUNTRY

Central Thematic Dossier

1. Forced Returns of third country nationals

Forced Returns of third country nationals to their countries of origin is a highly symbolic EU policy to prevent irregular migrants from entering Europe. The effectiveness of the return system is still part of the overarching objectives of the European Commission's immigration policy.

The EU area is governed by the principles of freedom, security and justice, which apply also to the Return Directive², which invokes a set of fundamental rights for forced returns, including: non-refoulement under international law, right of appeal and juridical protection against forced removal, humane treatment at all stages of the procedure, deprivation of liberty of the returnees only as an exception when less coercive, alternative means cannot be applied, but also the institutional guarantee of an effective forced-return monitoring system³. In harmonising Greek law with this Directive, the legislator appointed the Ombudsman as an external mechanism system for forced returns, and the Independent Authority carries out random checks at all stages of the procedure following the decision of return, i.e. his/her possible administrative detention to ensure the removal and execution of the police operation by land, sea or air.

Law 3907/2011 was adopted with a view to rationalising and reforming the system of international protection, reception, registration and identification of newcomers from third countries, as well as the reception and hosting system of applicants for international protection in accordance with international and EU law, and has succeeded in adapting the Greek legislation to the provisions of Directive 2013/32/EU of the European Parliament and of the Council on common procedures for granting and withdrawing international protection⁴, concerning, in particular, necessary amendments to the Immigration Code, in order to address organisational and substantive issues relating to the implementation of the existing framework and rationalised regulation of existing needs. The draft Act included provisions aimed at addressing both the urgent needs due to the refugee crisis and the financial and/or standing needs for the functioning of a fair and effective system of processing applications for international protection and a functioning system of return.

In article 23 of the Law, and in particular in paragraph 6, the Ombudsman is appointed as the external monitoring mechanism of forced returns, whose actions for the year 2018 will be included in a relevant Report. The related competence of the Ombudsman was fully activated upon the promulgation of the provided Joint Ministerial Decision (JMD) on the Ombudsman's proposal which specifies the provisions for the external monitoring of returns. The Joint Ministerial Decision provides for a constant flow of data from all the services responsible for forced returns and readmissions, and since mid-2015 the Independent Authority has been continuously informed by the Hellenic Police of the forthcoming operations in order to be able to exercise the prescribed monitoring. As such a monitoring mechanism, the Ombudsman may use all the institutional tools provided for in its statutory provisions, carry out on-site inspections, have unhindered access to all places of detention or transit throughout

2 <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32008L0115>

3 EU Return Directive, article 8, par. 6

4 <https://eur-lex.europa.eu/legal-content/en/ALL/?uri=celex%3A32013L0032>

the territory, and, in addition, its staff take part as observers in police force removal operations. The Ombudsman makes reports and proposals on how to improve return procedures to the administration, which is obliged to give a justified reply. It publishes its conclusions in a special report, which is lodged to the Greek Parliament annually.

Following the entry into force of the European Regulation⁵ on the conversion of FRONTEX into a European Border and Coast Guard⁶ and the strengthening of its powers to manage the external borders of the European Union, there is an increased cooperation between the Ombudsman and this European body. The Regulation provides for a separate Complaints Mechanism which operates under the FRONTEX Fundamental Rights Officer.⁷

Any person who is directly affected by the actions of FRONTEX or Member States staff, involved in FRONTEX operations, may submit a complaint with the FRONTEX Complaints Mechanism which is responsible to investigate the alleged facts and report back to the European institution within six months, while the complaint is forwarded to the Ombudsman, as national fundamental rights mechanism⁸. The development of the three complaints that FRONTEX forwarded to the Ombudsman in 2017 is detailed in its previous report⁹. By the end of 2018, one of them still remained inconclusive. In particular, there was an ongoing investigation on the infringement of the right of international protection of a Syrian family during the readmission operation of 20.10.2016,¹⁰ for which one and a half year later the report¹¹ of the General Inspector of Public Administration, did not come to the conclusion as to any acts or omissions of the Hellenic Police, on the grounds of lack of competence; the Ombudsman requested the Hellenic Police to carry out an urgent internal administrative investigation in order not to leave any impression of lack of transparency.

The same Regulation provides that FRONTEX shall constitute a pool of forced-return monitors from competent bodies who carry out forced-return monitoring activities, and who shall be invited to participate in European return operations¹². In this context, the Ombudsman designated eight (8) of its staff members for participation in the European monitors' pool.

However, two years after the adoption of Regulation 2016/1624, the Ombudsman continues to have reservations¹³ regarding its structure, not only for the lack of clear operating rules and funding of the European monitors pool but, most importantly, for questions of accountability, since the guarantee of the external monitoring of returns¹⁴ is internalised as the monitors refer to FRONTEX. This is also the case for the evaluation of the results of the complaint of the European Complaints Mechanism by FRONTEX itself. This transfer of forced returns monitoring from national, independent and ex-

5 <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R1624>

6 <http://data.consilium.europa.eu/doc/document/PE-29-2016-INIT/en>

7 Article 72

8 Article 72, par. 4

9 <https://www.synigoros.gr/?i=human-rights.en.recentinterventions.526546> page 22 et seq.

10 Case 001/2017

11 Audit report No 2/2018

12 Article 29

13 Forced Returns report 2016, <https://www.synigoros.gr/?i=human-rights.en.recentinterventions.457395> p.15 ff.

14 Article 8 (6) of the Return Directive

ternal mechanism to FRONTEX itself as the single agency of execution and monitoring of forced returns is even more critical due to the express objective of the European Commission to further reinforce FRONTEX's action at the Union's external borders.¹⁵

The Ombudsman continued relentlessly in 2018 to have an active role as the national external monitoring mechanism in the Greek State's return/readmission procedures and to work, in cooperation with European and international bodies, towards a more complete system for the implementation of external monitoring. At the same time, it intervened in cases of returnees who, during the pre-removal control, were found in need of protection, but also in cases of administrative detention of questionable legality. With a full sense of responsibility for the mission of the Independent Authority as an institutional guarantor of both the fundamental rights of the returnees and the legality and transparency of the related administrative action, a field where various European Union policies coincide in a state of uncertainty, the Ombudsman will continue to promote the understanding that fundamental rights are an integral part of legality in a functioning State based on the rule of law.

2. Prevention of torture and other cruel, inhuman or degrading treatment or punishment

The OPCAT¹⁶, which entered into force in 2006, provided for the establishment of a monitoring system — by international and independent national bodies — for detention facilities in order to avoid forms of conduct constituting torture or cruel, inhuman or degrading treatment or punishment.

The ratification of the Protocol by the national delegation in 2014 created new challenges and increased responsibilities for the Ombudsman: The Independent Authority, having years of experience and expanded specialisation and know-how in the protection of fundamental human rights, has taken over the role of the National Preventive Mechanism (NPM) provided for in the Protocol, which is the independent national body for monitoring the conditions in areas of confinement¹⁷. An additional guarantee for the successful fulfilment of the Authority's mission as the NPM has been the long-standing supervision of particular issues relating to the establishment of conditions of detention and living conditions in line with international conventions and EU requirements before the specific competence was assigned to the Ombudsman.

2018 was the fifth year the Ombudsman exercised its specific competence as National Preventive Mechanism in accordance with the relevant provisions of Law 4228/2014, by which Greece ratified the Optional Protocol to the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment. 2018 was also a year of reflection on planning, operational development and systematic interventions to protect rights in all detention facilities: criminal, administrative, psychiatric, welfare. The central planning of the Authority for regular monthly visits in the Regions gave

15 EU Council Notices 28.6.2018 (11)

16 Optional Protocol to the Convention Against Torture (OPCAT). The Optional Protocol was adopted by the United Nations General Assembly in December 2002 and entered into force in June 2006.

17 Article 2 of Law 4228/2014 (OJ, SERIES A, NO 7/10.01.2014)

the NPM the opportunity to systematise its inspections in places of detention, while its presence at international level was intensified with participation in pan-European or regional meetings and networks.

In addition to regular visits and material sourcing from complaints to the Ombudsman by detainees, the NPM monitors current issues and has initiated a series of fact-finding contacts with relevant ministries and detention facilities' administrations in order to identify incidents, in particular deaths or injuries, that could lead to ex officio actions by the Authority on issues such as detention conditions, security measures, adequacy of staff, ensuring that particular requests or conduct are addressed in a timely manner, as well as dealing with emergency situations.

3. Investigating cases of arbitrary behaviour by the law enforcement agencies and staff of state penitentiaries

In the framework of its general competence for the observance of legality, the Ombudsman has always dealt with complaints regarding law enforcement agencies and staff of state penitentiaries and intervened on key issues by strengthening the legality of their action¹⁸. In particular, in 2004 the Ombudsman already made specific proposals for the disciplinary investigation of complaints about police violence¹⁹, in order to effectively control the violation of legal limits for the exercise of police discretion provided by law. The lack of effective investigation of these cases by the Greek authorities is highlighted in a series of convictions against Greece by the European Court of Human Rights (ECtHR) (see, for example: *Macaratzis v. Greece*, 20.12.2007, *Zontul v. Greece*, 17.1.2012).

Indeed, the need for an independent and effective mechanism to investigate cases of arbitrariness has been highlighted by many national and international bodies for the protection of human rights. As of June 2017²⁰, the Ombudsman became the National Investigative Mechanism (hereinafter referred to as "The Mechanism") investigating cases of arbitrary behaviour by the law enforcement agencies and staff of state penitentiaries²¹.

The specific investigation procedure of the cases of the Mechanism, which is distinct from the overall competence of the Authority, is described in the Rules of Procedure of the Mechanism²².

As the Mechanism, the Ombudsman is involved in the investigation of disciplinary responsibilities of the staff of law enforcement agencies and staff of state penitentiaries,

18 Special Report "Regular leaves of prisoners"

19 <https://www.synigoros.gr/resources/docs/astinomikoi.pdf> and the Authority's press release on Greece's condemnation by the European Court of Justice over police violence against Greek Roma <https://www.synigoros.gr/?i=human-rights.el.danews.34031>

20 Law 4443/2016, Article 56 replacing the Article. 1 of Law 3938/2011

21 As part of the above specific competence, the Ombudsman is now one of the twenty members of the Independent Police Complaints Authorities Network (IPCAN)

22 F.10/24727/2017

controlling conduct constituting torture (Article 137a of the Criminal Code (CC)), unlawful intentional attacks on sexual freedom, illegal use of firearms and unlawful behaviour with evidence of discrimination. The Mechanism is not a substitute for disciplinary control, but acts complementarily, ensuring effective investigation of such incidents.

Within the framework of the same competence, it is also a body to review and ensure compliance of the country with the ECtHR convictions for infringements of provisions of the European Convention on Human Rights²³, which identify shortcomings or new elements not assessed in the disciplinary proceedings or the hearing of the case. The Mechanism reviews these decisions and may decide to reopen the case in order to prosecute or complete disciplinary proceedings and impose an appropriate disciplinary penalty regardless of the initial hearing of the case.

The Mechanism deals with cases *ex officio*, following a complaint or referral by the Minister responsible or the Secretary General. It evaluates any case falling within its competence and decides either to investigate the matter or to forward it to the competent disciplinary body. In the first case, the disciplinary body shall suspend the decision making until the Mechanism issues its findings. In the latter case, the competent disciplinary body examines the case as a matter of priority and informs the Mechanism of the outcome of the investigation. The Mechanism assesses the outcome of the disciplinary procedure and may request an additional investigation of the case. The disciplinary body is not obliged to implement the recommendations of the Mechanism, but its deviation from them must be specifically justified. In order to improve the legislative framework governing its operation, the Mechanism has already recorded and submitted proposals deemed necessary to the competent Ministry and they will be included in the Special Report on the Mechanism to be adopted and published in the following year.

4. Rights of people with disabilities (PWD)

The United Nations (UN) International Convention on the Rights of PWD and its Optional Protocol have been ratified by Law 4072/2012²⁴. They provide for the establishment of a national framework on the promotion, protection and monitoring of the implementation of the Convention. In the course of implementing the law which transposed the Convention and the UN Protocol on the Rights of Persons with Disabilities into national law, the lack of a general framework to monitor compliance by the administration and the lack of assistance in promotion thereof was detected.

Law 4488/2017 designated the Ombudsman as the framework for the promotion of the implementation of the Convention²⁵, as the independent body offering guarantees for the mission.

Law 4488/2017 introduced a set of institutional provisions in the field of employment and social protection, which, among other things, aimed to facilitate the participation of

23 In accordance with Article 1 (5) and (6) of Law 3938/2011, as replaced by Article 56 of Law 4443/2016

24 Article 1 of Law 4074/2012 (OJ seriesA 88)

25 Applying the provisions of Article (2) 33 of the United Nations Convention

PWD in the social, economic and political life of the country. The definition of disability by the WHO suggests that, in addition to the element of inherent diversity determined on the basis of medical diagnosis, the role of the environment, as an aggravating factor through the obstacles it creates or as a facilitating factor due to the aids it provides, plays a critical role in the degree of difficulty faced by PWD.

The same kind of influence is exercised by social attitudes which either inhibit or stimulate social integration of these people. More than one million PWD live in Greece. They remain “invisible” to society as a consequence of the social construction of disability, because they lack accessibility to the natural and structured environment, as a consequence of the prevailing stereotypes and mentalities. As a result, the PWD see themselves in the same way as defined by the attitude of the society, part of which they are.

As the UN International Convention on the Rights of Persons with Disabilities is aware of the risk of marginalisation and deprivation of these persons, it calls upon the Member States to avert it by implementing its regulatory content for the purpose of more active and fuller participation of PWD in the socio-economic life. In this context, the law aimed to specify, clarify and assist in the application of the provisions of the Convention and to reverse the solidified concept of PWD as persons of high vulnerability and decreasing participation. Moreover, the provisions were aimed at the elimination of anachronistic stereotypes which define as a full person only the literally and metaphorically “standing” person, which put any disability outside of the scope of normality, which render the demands of the disability movement on the margin and consent to the considerable exclusion of PWD in the entire spectrum of their rights. The provisions of the law have been intended to serve as a tool for the deconstruction of institutional racism, under which serious discrimination is created in society, since the restrictions on rights and choices of specific groups that deviate in any way from the dominant regulatory standards (in the present case that of the physical, sensory, mental faculties) tend to be established by practices, procedures and regulatory measures adopted and tolerated by both the administration and society. With a view to ensuring a genuine balance, the provisions of the law are effective in making positive choices for the purpose of contributing to the participation of PWD in all aspects of life and the overall protection of their rights.

As the trustee of public and private rights, with particular regard to the monitoring and detection of violations of rights and to the implementation of the mediation procedure in order to promote the application of the principle of equal treatment, irrespective of (inter alia) disability or chronic illness, to the private, public and wider public sector, in accordance with the provisions of Law 4443/2016, the Greek Ombudsman is the independent body whose competence is to promote, protect and monitor implementation of the Convention. Some of the various aspects of this mission is to provide an opinion on the compatibility of the legislation with the content of the Convention, the drawing up of studies and surveys on the extent of the implementation of the Convention, the preparation of a report on the progress accomplished and development of awareness raising actions to create awareness of the rights and competences of PWD in society as a whole.

5. Children's rights

By means of Act No 2101/1992²⁶, the Greek Government ratified the UN Convention on the Rights of the Child²⁷. The special task of promoting Children's rights, in addition to the overall competence for Children's rights protection has been entrusted to the Department of Children's rights since 2003²⁸.

In pursuit of this objective, the Ombudsman makes a constant use of the international and, in particular, European scientific arsenal, both in terms of institutional tools and in relation to existing and innovative new practices.

At the same time, it seeks new ways of promotion which are adapted to the needs of the child in modern economic and social context.

It is with this perspective that the Ombudsman in 2018 focused its actions and promotion measures on aspects of the rights of the child that are found not to be adequately ensured, in particular due to institutional and operational gaps. It held 127 meetings with representatives of ministries, services dealing with minors, education, welfare, health, justice, international organisations and NGOs. The relevant interventions of the Authority focused on the role of the Ombudsman in the modern social environment and in the trafficking of minors, the protection of mental health, the fight against school violence, the protection of unaccompanied minors, minorities (Roma) and, in general, of all minors, as well as issues relating to diversity, abuse and neglect, deinstitutionalisation and inclusive education.

Furthermore, the Ombudsman met, heard and carried out joint actions with children in 34 schools, fuelling and fuelled with knowledge and suggestions about the rights of children and their specific and evolving needs in everyday life.

At the same time, it visited places where minors are hosted or residing in a context of detention or deprivation of liberty, in order to gain a deeper understanding of the children's own perspectives, the deficits and the possibilities to claim and to safeguard their rights, setting out the aims of the Authority for the next period. It listened to the minor detainees at the Corinth Detention Facility and the Juvenile Correctional Centre of Volos and met with children in hostels, secure camp sites, hotspots²⁹ and foundations (37) throughout Greece.

The Ombudsman's constant contact with children is also ensured by the free telephone line for children, which received 860 calls (from minors and adults) over the past years, and in recent years by the electronic form "Ask the Ombudsman"³⁰, with 81 emails in 2018. It is worth noting that these two specific tools for the communication of minors with the Ombudsman are different from the Authority's call centre, to the extent that they usually go beyond the provision of simple information on the competence of the body and are managed by the specialised department, with the aim of either receiving a complaint by the minor or, in many

26 O.J. SERIES I, NO 192

27 Convention on the rights of the child. The Convention was adopted on 20 November 1989 and entered into force on 2 September 1990

28 Law 3094/2003 1 (1): 'The Ombudsman also has the task of defending and promoting the best interests of the child'

29 For more details, see above "Children on the move — Children Refugees and Migrants" <https://www.synigoros.gr/?i=stp.en.news.426907>

30 Children's Rights site at the Ombudsman: www.O-18.gr

cases, for providing information, awareness raising and empowerment of the minor in the exercise of his/her rights.

6. Equal Treatment

Over a period of ten years, the Greek Government incorporated EU legislation³¹ to respect and promote the principle of equal treatment: Directive 2000/43/EC implementing the principle of equal treatment between persons irrespective of racial or ethnic origin, Directive 2000/78/EC establishing a general framework for equal treatment in employment and occupation, Directive 2002/73/EC implementing the principle of equal treatment for men and women as regards access to employment, vocational training and promotion, and working conditions and Directive 2014/54/EU on measures facilitating the exercise of rights conferred on workers in the context of freedom of movement for workers.

Legislation of 2016 and 2010 has made the Ombudsman the competent body³² responsible for monitoring and promoting the application of equal treatment in the national legal order. It is an object that extended the Ombudsman's institutional work as an Equality Body, already in place since 2005, to combat discrimination on the grounds of racial or ethnic origin, religion or belief, disability, age or sexual orientation, and subsequently a body for equal treatment of men and women in the field of employment and occupation³³.

The 2016 legislation³⁴ however, in addition to enhancing the competence of the Ombudsman in the private sector³⁵, transposed into Greek law the relevant European Directive on the free movement of workers within the EU³⁶. This institutional framework reflects the targeting and efforts to eliminate inequalities and the enjoyment of fundamental rights and freedoms in the European area and in our national legislation. In this context, all three provide for a national body, with functional independence, to be appointed as the national Equality Body to monitor and to promote their subject-matter.

Under the current legislative framework³⁷, all relevant provisions are encoded to a large extent for the first time, and the Ombudsman is given a comprehensive function in all matters of equal treatment, where there was before a thematic division and a division of responsibilities³⁸. In order to meet the high and increased requirements of this role, the Ombudsman assigned the object to a distinct Department of the Authority, which is in line with the common standards developed at European level with regard to the functioning of national equality bodies³⁹.

31 Law 3304/2005, 3488/2006, 3896/2010, 4443/2016

32 Law 4443/2016, in conjunction with Law 3896/2010

33 Law 3488/2006 and Law 3896/2010

34 Law 4443/2016

35 Directives 2000/78/EC, 2000/43/EC

36 Directive 2014/54/EC

37 Law 4443/2016 in conjunction with Law 3896/2010 on equal treatment between men and women

38 Law 3304/2005 on the powers of the Ombudsman, the Labour Inspectorate Body (SEPE) and the Equal Treatment Committee of the Ministry of Justice

39 General Recommendation No 2 of the European Commission (ECRI General Policy Recommendation No 2)

This organisational change has meant a systematisation and further development of the internal distribution of the complaints to the Ombudsman, but also the overall supervision of issues directly or indirectly linked to discrimination. At the same time, the use of tools provided by the law for the protection of persons suffering discrimination by the Ombudsman's intervention has been improved (representation in labour disputes, recommendation of a fine to the SEPE, shift of the burden of proof, more general interference with the promotion of the principle of equal treatment), in order to make its intervention as effective as possible.

Distinctly but sometimes combined with the handling of individual cases, the Ombudsman acts to promote the principle of equal treatment by raising awareness and communication with social partners and state institutions with a view to creating the right conditions to combat stereotypical assumptions leading to violations of the principle of equal treatment. Important in this endeavour is its participation in Equinet, the European Network of Equality Bodies, where, through the exchange of good practices, shared concerns and challenges in the interpretation and implementation of the legal framework on discrimination, the Ombudsman monitors and co-shapes the developments at European level.

7. The Ombudsman as a body implementing the principles of good law-making

In 2012, ten years after the first European Union initiatives in the field of improving the quality of law-making⁴⁰, Law 4048/2012 introduced into Greek law its basic principles, reserving a special institutional role to the Greek Ombudsman.

Principles of good law-making include proportionality meaning the suitability and reasonable relationship between means and purpose, adoption of the least onerous measure, the simplicity and clarity of the content of the provisions, the avoidance of contradictory provisions, effectiveness and efficiency, taking into account the economic consequences of a regulation, transparency, subsidiarity and accountability by identifying the competent implementing bodies, legal certainty, open procedure, i.e. the possibility of submitting proposals relating to the provisions during the preparation and evaluation of their implementation, accessibility to regulations, in the sense of both easy access (e.g. by being available on user-friendly websites) and easy understanding of the provisions which must be as easily understandable as possible.

A key novelty of Law 4048/2012, according to its explanatory memorandum, was *“the institutionalisation of the impact assessment, which will strengthen transparency by providing any interested party with the data and facts necessary for the assessment of regulatory initiatives and the implementation of the provisions since the resources and possible interventions required for it have been assessed in advance”*.

40 Better lawmaking continues to be one of the EU's key priorities, under the authority and supervision of the first vice-president of the European Commission, Mr. F. Timmermans. See the Commission's Regulatory Fitness and Performance Programme (REFIT): https://europa.eu/info/law/law-making-process/evaluating-making-taking-eu-law-simple-and-less-colly_en

In exercising its competence as mediator and in the context of its competence to review the legality of administrative acts, the Ombudsman is often aware of shortcomings and legal flaws in existing legislation, the inability of legislative provisions to regulate current situations, ambiguities which lead to misinterpretations, contradictory regulations and general problems in the construing and implementing laws.

Throughout the 20-year period it has been operating, it has submitted to the Administration proposals, both organisational and legislative, seeking to contribute in improving the quality of the legislative framework and thus ensuring better services to citizens and combating the phenomena of maladministration. Its findings and special reports assess the effectiveness of laws and regulatory acts, identify and define problems, and provide clear and detailed observations and recommendations for the correction of defects and the achievement of the intended objectives. The interventions of the Ombudsman, based always on its experience and know-how, and on its institutional prerogative to have an overview of the existing problems, all too often contribute to the best regulation of serious issues.

Law 4048/2012 which set out the principles, procedures and instruments of good law-making, wanted to make use of the Authority's already significant contribution to reforming existing legislation and taking legislative initiative to address critical issues, with a view to improving regulatory governance. In particular, in accordance with the Article 7 (2) of the above Law, *"the Office of Good Lawmaking and the Ombudsman cooperate with the Legislative Initiative Offices of the Ministries provided for in Article 14 to improve the quality of the impact analysis"*. Cooperation in general with the Independent Authorities with the Office for Good Lawmaking of the General Secretariat of the Government is provided for under the Article. 15 (2b), thus recognising their accumulated experience in matters within their competence.

In this context, as of July 2017 —the preparatory work in question already started in spring— the Ombudsman cooperates with the Office for Good Lawmaking for the purposes of conducting the training seminar entitled "Good Law making in practice: Drafting of regulatory texts and accompanying documents", organised by the Training Institute of the EKDDA, addressed to officials of the Legislative Initiative Offices and, in general, to officials from ministries involved in the process of legislation production. Experts of the Greek Ombudsman and officials from the General Secretariat of the Government are invited to include topics such as key elements and principles of good lawmaking, explanatory memorandum and explanatory report, impact assessment, evaluation of the results of implementation of regulations and public consultation, with the effects so far being highly satisfactory as a result of constructive cooperation. The said training programme, as far as the Ombudsman knows, will continue in the coming year. ●

An abstract geometric pattern on a dark green background. It consists of numerous thin, light-colored lines connecting various colored dots. The dots are in shades of black, orange, green, blue, pink, purple, yellow, and light blue. The pattern is more dense on the left side of the image, with lines and dots forming a complex web, and becomes sparser towards the right. The text 'Specific Thematic Dossiers' is positioned on the right side, overlapping the less dense part of the pattern.

Specific Thematic Dossiers

SPECIFIC THEMATIC DOSSIERS

In parallel with the specific competences and actions entrusted to it by European Directives and International Conventions, the Ombudsman exercises its mediation and scrutiny role within its general competence, in order to resolve and combat cases of maladministration and ensure the administration's compliance with the rule of law and protection of citizens' rights.

Most of the areas in which maladministration is found, remain -unfortunately- stable, showing differences only in the types of problems that arise from year to year. However, there are particular issues relating to a large number of citizens, which the Ombudsman highlights, in which it has carried out substantial interventions and drawn up specific findings and proposals on how to deal with them. The most important issues raised by the Authority during this year are presented in detail below:

- Social security
- Social solidarity and welfare
- Provisions of health services
- Problems of access to the labour market
- Protection of children's rights
- Higher education
- Management and protection of natural environment
- Public utility and social responsibility networks
- Transport
- Income tax
- Civil status and citizenship
- Immigration
- Political Asylum

1. Social security

Acting as a mediator in social security matters, the Ombudsman is often faced with organisational problems, incorrect application or arbitrary interpretation of statutory provisions by the Administration and the failure to comply with court judgments. There were also several cases where excessive delays in the processing of requests, differentiated treatment of the same situations, lack of reasoning for administrative acts, and even financial burden incurred by insured persons occurred as a result of administrative errors. For example, in the context of its interventions, the Ombudsman:

- Proposed the creation of an electronic platform to inform beneficiaries of the refund of sickness contributions withheld including the exact manner of calculating the relevant amounts.
- Asked for the same benefits to be granted to pensioners with 80 % disability who are beneficiaries of the EKAS and to those who lost the EKAS benefit but are entitled to compensatory measures.
- Convinced the administration to reimburse an insured person with the sum he had paid to buy out his military service period, due to a mistake made by the administration.
- Caused the correction of the sum of Special Contribution to Supplementary Insurance of Law 3986/2011 (in favour of the AKAGE) in supplementary pensions and the reimbursement of the arrears to pensioners.
- Asked for the review of the interest rate on the basis of which interest was calculated to date when applying for unduly paid benefits in cash from the MTS and the EKOEMS.
- Specified that Judgment No 244/2017 of the Court of Auditors, as a result of a standard trial, must be applied universally to all government pensioners, both in terms of the interruption of deductions from their monthly pension and with regard to arrears from 10.2.2017.
- Proposed to create a Directorate-General for Pensions of the General Government within EFKA and maintain existing directorates and departments of the GLK, as well as staff already in service, in order to provide more effective service for pensioners.
- Contacted the Alternate Minister of Finance on the full compliance of the GLK with the judgments of the Council of State on cuts to the salaries and pensions of the military staff, so that the retired staff can receive the sums they were entitled to under the court's judgment.
- Managed to establish that EFKA and the KEAO would accept that the limitation period for the claims of the former IKA in respect of its private debtors is not interrupted by the notification or posting of the relevant assessment notice.
- Convinced the insurance agency not to seek reimbursement of periodic benefits unduly paid, in case the recipient was acting in good faith and the error of payment lies with the administration.
- Put forward a number of proposals to address the inability of citizens to retire

due to debts to the former OAEE and to the former ETAA, despite the fact that over the years they paid the statutory contributions.

- Stressed the obligation of EFKA to provide specific justification for its acts.
- Suggested to an insurance fund that the granting of the lump-sum benefit should no longer be linked to statutory and other provisions of the individual insurance funds that required the receipt of a supplementary pension.
- Expressed its opinion on the practice of the ETEAEP, which converted the concept of voluntary insurance into a mandatory scheme retroactively.
- Contributed to the retirement decision for a father of a disabled child for whom the fund had asked the GLK for its opinion, indicating that he met all the legal requirements.
- Called for the objection of interested party to be accepted and for the pension decision to be amended in order for the citizen to finally obtain a full old-age pension as the mother of a minor child and not a reduced old-age pension.
- Proposed that IKA-ETAM immediately comply with a court decision and adopt an act by which it would finalise the social security history of the citizen concerned.
- Contributed to register a child as her grandmother's dependent, since the mother was not entitled to do so.
- Contributed in convincing EFKA that a power of attorney was valid, even if the pensioner was diagnosed by the KEPA with a mental disorder.

2. Social solidarity and welfare

The support and protection of vulnerable groups, the fair and equitable provision of social benefits, as well as their protection from attachment, in line with the purpose for which they have been provided, have been the main objectives of the interventions of the Ombudsman in the field of social solidarity and welfare. On major issues, developments have been particularly satisfactory:

- Following a prolonged intervention, the Ombudsman persuaded OAED to issue a decision, which facilitates the registration of unemployed persons who do not have permanent residence, in the records of the organisation.
- It also brought to the attention of the relevant ministers a number of issues relating to the procedure for granting the social dividend for the year 2017, while making proposals to improve the legislative framework.
- Following the Authority's intervention, the KEAO introduced a procedure to limit attachment in the hands of a bank as a third party, when the attachment concerns amounts of unseizable social benefits.
- The Ombudsman made a request for protection from attachment of insurance benefits and allowances relating to the sensitive period of pregnancy, birth and lactation. OAED, driven by the Ombudsman's views, amended its decision and allowed deposit of the benefit which it gives to any commercial bank active in the Greek area.
- The Authority highlighted the issues raised by the imposition of sanctions on suspended beneficiaries of Social Solidarity Income and eventually succeeded in settling the main problems with new Joint Ministerial Decisions.
- The Ombudsman intervened to include primary immunodeficiency in the Single

Table for Determining Percentage of Disability and it was thus possible to include patients with this condition in support programmes for people suffering from blood conditions.

3. Provisions of health services

Shortages of resources and staff, bad practices and bureaucratic rigidities are only a few of the factors that hinder citizens' access to public health services and the provision of prompt, high quality and effective health care. The following are the cases in which the Ombudsman:

- Investigated an unjustified absence of a doctor in a local clinic and stressed that access to health services is a basic right for patients.
- Noted the importance of the efficient sorting at the emergency departments of general hospitals during on-call time, in order to provide the right emergency care.
- Mediated in favour of a patient who received treatment at a private hospital in her area, having a contract with the State, so as her treatment not to be considered equivalent to that of a state, university or military hospital, which would have resulted in her not being reimbursed for travel costs.
- Mediated in favour of a patient who needed a certificate by the hospital in his place of residence stating that such hospital was unable to provide him with the necessary treatment so as to receive the cost of travel by EOPYY.
- Mediated in favour of a pregnant woman for reimbursement of the medical costs she had paid to the public hospital due to childbirth, as she was entitled to free care, regardless of her legal status.

Specifically, with regard to the protection of minors' health:

The Authority noted the necessity of children vaccination within the framework of the protection of public health. It also asked the Ministry of Education, Research and Religious Affairs for clarification in order to leave no doubt about the obligatory nature of the prescribed vaccines in view of the enrolment of children in education, with the only possible exception of a medical contraindication.

There is a question as to the vaccination of minors, in particular aliens not the holders of an AMKA, and therefore have no free access to health services. So far, there has been no relevant care by the State, and in the cases where the Ombudsman has intervened children were vaccinated by non-governmental organisation rather than through State structures.

4. Problems of access to the labour market

The creation of new jobs and the employment of highly qualified human capital in the domestic labour market are prerequisites for combating unemployment and halting

the exodus of Greek scientists abroad (brain drain), which will, at the same time, help the Greek economy to bounce back. However, the current situation appears not to favour in particular the achievement of the above objectives, either due to lengthy procedures in the recognition of qualifications or due to problems in the current, relevant institutional framework. The relevant issues will be reflected in a special report by the Ombudsman in the near future.

In the course of the year, the Authority was particularly engaged in:

- The excessive delays by the Hellenic NARIC in the examination of applications for the recognition of foreign qualifications as equivalent or as both equivalent and correspondent to those awarded by domestic higher education institutions.
- The excessively lengthy procedures for the professional recognition of foreign qualifications by the Council for the SAEP.
- The preconditions which were arbitrarily established by professional or amateur bodies during the recruitment of football coaches that they must be holders of a university degree from the SEKT or from an equivalent foreign school.
- The fact that the boat masters' certificates of Merchant Shipping Class C cannot be validated beyond the date of 31.12.2016, which makes the people concerned unable to exercise their profession.

5. Protecting of children's rights

5.1 Private and family life of the child

Children's fundamental rights can be violated within the family either because of problems in family relationships or poor parenting. The children's right to live with their parents may also be threatened by problems and rigidities related to administrative proceedings.

The Ombudsman, acting always in the best interests of the child, intervenes when:

- The exercise of parental care imposes restrictions to the child's autonomy and the development of his/her personality.
- The child's right to alimony is affected by non-payment either by the beholden parent or by public authorities.
- The child is prevented from living with his/her parents due to administrative proceedings. In a specific case, the Ombudsman achieved the reunification of a foreign mother with her two minor children, who at the time of her detention were held in a child protection structure following a public prosecutor's order.
- The exercise of custody by one parent leads to the loss of communication or to problems in the child's relationship with the other parent.
- The child is abused or exposed to risk within the family. Often in such cases the information comes from the school. The Ombudsman, in the context of its com-

petence to mediate, cooperates with the appropriate supporting bodies and, if necessary, informs the competent public prosecutor.

- The protection of minors' privacy is violated with the uploading of their photographs to social media.

5.2 Children's right to education

Significant shortcomings and gaps persevere in the field of education, and there are recurring issues for which the Ombudsman has already exercised its mediating role towards the competent bodies and has repeatedly stressed the need to tackle them. In particular:

- The supply of parallel support to students in need remains problematic and insufficient even in the year 2018, mainly due to the lack of available funding through the NSRF programmes for the recruitment of supply teachers.
- Significant difficulties arise in the process of inclusive education for students with disabilities and/or special educational needs both for themselves and for their classmates and teachers due to the lack of the necessary support measures.
- The lack of specialist support classes in certain nursery schools implicates the risk of exclusion of children with special educational needs.
- Concerning the transport of pupils there are still issues owing on one hand to the lengthy tendering procedures, and on the other to the lack of interest by the professionals concerned in certain areas, or even the lack of such transport means.
- Despite the fact that following the Ombudsman's intervention foreign pupils' integration in the educational system had been facilitated, new impediments have arisen due to new circulars and legal measures, which rendered the position of these pupils even harder.
- It has been observed that there has been a gradual degradation of the school environment, as well as of the recreational areas for minors, having a negative impact on both the educational process and the children's daily routine. High repair costs lead to the adoption of temporary solutions, which do not provide the required security.

5.3 Access to nursery schools

Ensuring access to municipal nursery schools is one of the requests the Ombudsman is called to deal with every year, with the relevant complaints increasing in number and frequency. According to these complaints, it appears that, due to economic conditions and/or obligations in terms of working hours, the parents seek to secure positions in public structures or better economic conditions through NSFR programmes. The Authority's mediation was mainly requested in the following cases:

- When the application of the beneficiaries of the NSFR Programme "Work Life Balance" were rejected
- For the resolution of problems between parents and municipal or private nurs-

- eries concerning the fees
- In cases of toddlers' exclusion from pre-nursery classes because they lacked potty training.

6. Higher education

The majority of secondary education graduates decide to enter higher education. Nevertheless, the smooth completion of studies is hampered not only by problems of the higher educational institutions but also by the lack of comprehensive student care.

Special mention should be made to the procedure of transfers from one University to the other, which aims to remedy the State's inability to provide effective financial aid to university students. This inadequacy of the existing student care framework affects primarily the Greek family, particularly in the context of the current unfavourable socio-economic situation.

In the field of higher education, the Ombudsman registered the following problems:

- In ordinary transfers, issues arose due to extra points awarded to students on the sole basis of family income. Moreover, problems have been observed in the implementation of the new ministerial Decree, which defines the preconditions and the procedure for the transfer of siblings.
- In extraordinary transfers, it is necessary to systematise the acceptance criteria, as well as to indicate and categorise the reasoning of the rejections.
- Legality issues were raised in connection with the procedure of admission examinations at the Department of Special Education of the University of Thessaly, regarding not only the way in which the examinations of a specific course took place but also the fact that a review assessment had not been provided.
- Problems were also created in the implementation of the Joint Ministerial Decision on awarding the housing benefit to students of higher education. Several applications were rejected on the grounds of income, real property, the level of the students' performance in their studies, as well as of their accessibility to the TAXIS e-platform of the AADE. The Ombudsman intervened with the relevant Ministers and proposed to amend the legal framework.
- Regarding the Hellenic Open University, shortcomings were observed in the submission of applications for participation in one of the programmes of postgraduate studies as well as in the handling of requests for the deferment of studies on the grounds of serious health problems. At the same time, the Ombudsman's intervention was triggered by problems found both in the procedure and the criteria for the selection of the external teaching staff.
- Finally, the Harokopio University arbitrarily defined a deadline for the completion of a doctoral thesis, despite the fact there is no relevant legal provision.

7. Management and protection of natural environment

7.1 Protecting the environment and public health

In cases of major degradation of the environment or environmental disasters, accountability, ensuring full implementation of environmental legislation and taking prevention measures in order to avoid the reoccurrence of such incidents in the future, are of utmost importance.

The Ombudsman's intervention, in the context of its institutional role, consists actually of investigating the causes of the damage and triggering the appropriate procedures for its reparation.

In particular, the Authority:

- Investigated the landslide in the lignite mine at Amyntaio, its environmental impact, the precaution measures that should have been taken, and the exploitation conditions that followed the incident.
- Following the devastating fire in Mati (in Attica), the Ombudsman addressed all the relevant bodies and asked them to record and highlight the causes of the problems. The Ombudsman will monitor the developments with a view to ensuring due process and protection of the environment and public health.
- The Ombudsman also intervened in waste management and waste disposal issues at the Reception and Identification Centre (hotspot) in Moria, in the island of Lesbos, in order to assist in the implementation of measures of restoration and prevention.
- In the context of the investigation conducted on the mineral oil pollution incident following the sinking of the tanker 'Agia Zoni II', the Ombudsman has monitored the handling of the environmental impact of the leakage by assessing the administration's response, which has been satisfactory so far.

7.2 Waste management and maintenance — improvement of the natural environment

The waste management sector has a high priority on the agenda of every modern and well-structured administration. New sustainable management methods are being sought and emphasis is put on limiting production at source, with the basic aim of preventing further deterioration of the natural and also of the urban environment.

In 2018 the Ombudsman requested the assistance of the competent authorities on:

- Illegal mining and waste disposal in the region of Saint Marina, in Chania (in Crete).
- The restoration of the site for infinite waste disposal on the island of Zakynthos.
- The installation of a biological treatment plant in the Municipality of Doxato in Drama.

8. Public utility and social responsibility networks

Together with transport networks, public utility networks constitute undoubtedly the most important investment (in economic and development terms) of a modern state, as well as the pillars for the development and improvement of the quality of citizens' life. They mainly concern energy, water and sanitation, as well as telecommunications. Their proper management is of national importance, given both their scope throughout the territory of a country and their vital importance to society as a whole.

However, rational management of these infrastructures ensuring accessibility for the whole population must expand further into the public debate and in policy-making, especially in our era, not only because of climate change and its effects, but most importantly due to the extensive economic crisis experienced by citizens in recent years.

The Ombudsman has systematically mediated in problems/protests of citizens against PPC, EYDAP and the Hellenic Telecommunications and Post Commission (EETT)⁴¹ and has been in continuous and fruitful cooperation with the actors involved in order to resolve them.

For instance:

- In the case of an excessive debt resulting from the illegal water supply of a building occupied by refugees, following the Ombudsman's intervention, EYDAP did not take measures against the owner and the payment of the debt is expected to be made by the Ministry of Migration Policy.
- The Ombudsman asked EYDAP to write off the taxes for the collection of urban waste, which had been imposed on citizens whose properties had not been connected to the urban waste network by the relevant municipalities. The Ombudsman also asked from the competent municipalities of Kifissia and of Acharnes to proceed with the construction of the necessary connections with the urban waste network.
- The Ombudsman intervened in cases in which the PPC had imposed on citizens unjustified charges for the supply of electricity. Thanks to the Ombudsman's intervention, the electricity bills were reviewed, charges were justified, the debts were reviewed, and the necessary corrections were made.
- The Ombudsman intervened to the PPC and EYDAP so that the citizens who were really liable for payment were found and the debts, which initially were imposed on other citizens, were transferred to them.

41 Meetings took place on 5.7.2018 in the Authority's premises with the subject of a debate on the landslide at the lignite mine of Amyntaio, on 21.6.2018 to discuss the late payment of PPC accounts by ELTA and the Debt Settlement Programme and on 9.3.2018 on the Attico Power Station (SES)

9. Management of public areas

Public space, whether natural or structured, serves public life, embraces the social and public functions of the city and shapes the aesthetic landscape. The quality and extent of public space and how it can be used is undoubtedly a representative indicator of the quality of life of the city's inhabitants, and the protection and safeguarding of adequate public spaces offset the degraded urban environment. Therefore maintenance, proper use and, where possible, improvement of the existing public spaces should be a constant concern of the administration. At the same time, in the context of structured urban planning, expansion thereof is often pursued on the basis of balanced development of the three targets: economy, society and nature.

However, the issue of the public space and its exploitation, although linked so closely to the citizens' quality of life, is at the same time a systematic point of friction between the administration and the citizens and, consequently, one of the Ombudsman's main areas of mediation.

For example, the Authority was called upon to address:

- the problems caused in Kallirois street by waste accumulation, wastewater leaking from a duct, the poor state of the pavement and the permanent parking of cars and motorcycles;
- unhealthy conditions and outbreaks of infection on the beach of Panormos, Naxos, due to the passage of animals;
- the occupation of public space by restaurants and coffee shops in Petralona and Gargalianoi in the municipality of Trifilia;
- the delays by the Municipality of Volos in the payment of compensation due to the expropriation of property in Agria, Magnesia;
- the long-term binding of properties in the Municipality of Fyli and the failure to expedite the statutory procedures for the payment of compensation;
- the delay by the Ministry of Culture in paying compensation for deprivation of use of real estate for archaeological purposes in the municipalities of Rethymnon and Rhodes;
- The siting and transfer of waste containers due to the lack of a specific design in the municipalities of Aigaleo, Heraklion Attica and Sikyona.

10. Enforcement and collection of municipal revenue

The legislative framework governing the enforcement and collection of municipal revenue has repeatedly been a source of interpretation problems and differences between municipalities and citizens⁴². It is noted that the municipalities do not pay the necessary attention in order to ensure the cumulative fulfilment of the legal preconditions for the enforcement and collection of the contributory fees and taxes, while their institutional

42 The revenue concerned, through the complaints submitted to the Authority, is the cleaning and lighting charges, the water supply/drainage charges, the property tax (TAP), the cemetery burial fees, the gross income charges, the charges for the use of public space, fees for the construction of sewer lines and water supply networks, the specific potential charges of Article. 25 (14) of Law 1828/1989 and various administrative fines.

framework as such is easy to drift in violations of both the contributory nature and the constitutional principles governing tax imposition. The practice of differentiated interpretation on the enforcement of municipal revenues and the adoption of different practices by the local authority bodies is quite common and tolerated by the municipalities' financial services.

The Ombudsman regularly contacts the Ministry of Interior to shed light on the institutional framework governing the collection of municipal revenue and make a continuous effort to offer clarifications to the municipal financial services. In particular:

- After continuous interventions by the Authority, the issue of the municipal tax exemption on unused and not electrified buildings was regulated. At the same time, provision was made for the cancellation of existing debts, subject to a solemn statement by the parties concerned within six months of the entry in force of the law.
- Following acceptance by the Minister for Interior of the Opinion of the Legal Council on the non imposition of Immovable Property Tax (TAP) on pilotis areas, the Ombudsman requested the Ministry to provide guidance to the municipalities in order to correctly and uniformly implement the provisions on the reimbursement of sums unduly paid by citizens;

Noting that municipalities address the issue of cancellation of arrears differently, the Authority asked the Minister for the Interior for legislation expressly stating that the lapse of the limitation period is a reason for the cancellation of debts under Article 174 of Law 3463/2006.

1 1. Transport

Vehicles (either for private or for professional use, either a lorry or a motor-cycle etc.) constitute assets, work and leisure tools for the vast majority of citizens and as such they become an integral part of the citizens' activities and interests. The State should therefore take special care so as to modernise and simplify the relevant administrative procedures.

The Ombudsman highlights the most significant problems, mainly resulting from the lack of interoperability of electronic databases kept in different public services:

- In the event of failure to complete the transfer of the vehicle, the seller, though practically alienated from the vehicle, remains liable for payment of road tax and insurance.
- There are long delays in informing debtors of traffic fines, placing them, in this way, in an extremely difficult financial position and also affecting the collectability of fines.
- The completion of administrative procedures is hindered, often with financial consequences for the owner of the vehicle.
- The Vehicle Register of the AADE is not informed of the thefts of vehicles or their seizure by the police authorities, so that these vehicles should be automatically

- put into the status of forced immobilisation.
- The lack of possibility to deregister the vehicles which have been stolen from the electronic files of the IAPR often entails the loss of benefits, as the possession of a vehicle is considered to be a presumption of income (take as an example the supply of heating benefit).

12. Income tax

In some cases, tax authorities interpret tax law provisions and other fiscal regulations in an unorthodox way, in order to protect the State treasury.

The Ombudsman's intervention to the IAPR was triggered by the refusal of the competent financial authorities to take into account, for the benefit of the taxpayers, the income tax already withheld after a period of three years has elapsed, on the grounds that this tax has been time-barred as undue payments to the State.

13. Civil status and citizenship

13.1 Civil status

The inclusion of data on identification documents according to the standard EL07 743, the existence of errors, or even the fact of disputing the administrative documents' authenticity, impede the administrative procedures and, consequently, create problems for citizens in their dealings with public services. In the context of its interventions, the Ombudsman stressed that public administration must preserve legality while exercising its duties, showing at the same time the necessary flexibility, especially in cases in which the citizens' rights are infringed by no fault of their own.

In particular:

- The Ombudsman proposed to simplify both the procedure of checking entries in civil status documents and the correction of minor errors, so that a prosecutor's order or a court order is not required.
- The Ombudsman has succeeded in that the Greek Police are no longer rejecting passport requests when the applicants hold ID cards with an abbreviation of their birthplace, but they advise them to have their ID cards replaced in due time.
- The Ombudsman has also caused the issue of a Ministerial Decision which provides for the possibility of data transcription in Latin on seaman's registration books, derogating the EL07 743 standard, on condition that the transcription in Latin is consistent with the ID data.

13.2 Citizenship

The Ombudsman has repeatedly highlighted the very positive effects of Law 3838/2010 on the integration of migrants and their families into Greek society through the introduction of relevant effective procedures. At the same time, however, significant shortcomings have been observed, concerning mostly the long and unjustified delays

in naturalisation procedures, but also in the disparities in the judgement of whether the preconditions for the applicants' integration in Greek society during their interview by the Citizenship Committees are met or not.

- The Ombudsman submitted specific proposals on the procedures for examining the requests and awarding the Greek citizenship to specific, vulnerable categories of applicants; contributed to establishing a telephone helpdesk, which provides more information to those concerned; and suggested that the procedures for the acquisition of the Level A Certificate of the Greek Language be reformed. The Ombudsman's suggestions have been taken into consideration and will be put in practice.
- The Ministry of the Interior announced measures destined to improve the integration of the people involved and reducing the time of naturalisation.
- Following the Ombudsman's cooperation with the Special Secretariat for Citizenship, a guide was drawn up on the "Simplified instructions on the acquisition of Greek citizenship".
- The Authority's intervention was requested in several cases involving the establishment of Greek citizenship for minors, as well as in cases where complex administrative procedures, interpretation of rigidities and particularities in administrative practice hindered the resolution of relevant problems breaching the right of minors to citizenship.
- In the case of naturalised expatriates, for whom there are pending penal proceedings as a result of having used false documentation, the Ombudsman requested that, until the penal proceedings have been completed, the presumption of citizenship and the right to a fair hearing be preserved.

14. Immigration

The legislative reforms in the year 2018⁴³ have brought about mostly positive changes in the residence permit situation. Nevertheless, there are still well-known administrative malfunctions and bureaucratic rigidities, which cause long delays in almost all ELT of the country, during the examination of requests for the granting and renewal of all categories of residence permits. The Ombudsman, making use of its long institutional experience in immigration issues:

- Monitors the developments in this field and makes suggestions for a more rational organisation of the residence permit procedure for exceptional reasons.
- Seeks to contribute to further improving the Immigration and Social Inclusion Code through specific observations.

15. Political Asylum

Administrative inefficiencies and problems during the asylum seekers' arrival on the islands, where migrants and refugees' reception structures function, have not ceased to exist.

43 Law 4540/2018 and 4546/2018

In an effort to counteract these problems, the Ombudsman:

- Submitted its observations to the competent Minister and the Parliament triggering the draft bill entitled “Adapting Greek legislation to the provisions of Directive 2013/33/EU”, aimed to contribute to the proper transposition of the Directive in Greek Law and at protecting the asylum seekers’ fundamental rights.
- Intervened in order to ensure that requests for access to the international protection of Palestinians and other third country nationals, who were detained near the north-east borders of the country, were immediately examined.
- Submitted to the Minister for Migration Policy a report on the assessment of the European programme for the relocation of asylum seekers, which was drawn up following the Ombudsman’s participation in the Board of Directors for Europe of the International Ombudsman Institute (IOI).

15.1 Report on the relocation of asylum seekers

In October 2018, the Ombudsman submitted to the Minister for Migration Policy a report on the assessment of the European programme for the relocation of asylum seekers ⁴⁴, which was based on its participation in the Board of Directors for Europe of the International Ombudsman Institute.

The report presents the Greek experience from the implementation of this emergency two-year measure of the EU Council, for the relocation and allocation of asylum seekers from Greece and Italy to other EU Member States. The report analyses the available statistics, underlining that the processing of relocation applications by the Asylum Service in Greece was accelerated in 2016, but the full response of the Member States was achieved in 2017.

The report, in addition to the procedure problems (lack of a complete regulatory framework, lack of specific reasoning in the rejections, etc.), points out that the programme excluded applicants of International Protection who crossed the Greek maritime borders after the entry into force of the EU-Turkey Joint Statement on 20.3.2016.

Therefore, the decisions of the EU Council on relocation have been de facto amended by the EU-Turkey Statement and the scope of the programme was essentially limited to only a smaller proportion of the asylum seekers than that initially foreseen in 2015.

In reviewing the success of the programme (21.710 relocations until its completion), it should also be taken into account that applicants from countries with a European average of less than 75 % in refugee status recognition were excluded. It was observed that the European average lags considerably behind the Greek average of recognition of refugee status, concerning the three main nationalities - Syrians, Afghans and Iraqis - while according to recent statistics, only Syrians surpass the 75 % threshold for relocation.

Given the experience drawn on the implementation of the programme, the report concludes that the measure of relocating the asylum applicants is likely to become a permanent measure and be included as a tool of solidarity in the Dublin Regulation, so that the asylum seekers’ flows will be handled not with a piecemeal approach, but within the context of a coherent preventive strategy. ●

44 <https://www.synigoros.gr/?i=stp.en.news.525096>

An abstract geometric pattern consisting of a network of thin white lines connecting small, colored circular dots. The dots are in various colors including black, purple, blue, pink, orange, yellow, green, and cyan. The pattern is more dense on the left side of the image and fades towards the right.

Legislative and Organisational Proposals — Comments on Draft Laws — Special Reports

Always aiming at the implementation of the principles of good lawmaking, the Greek Ombudsman proceeded in 2018 to submit new legislative and organisational proposals and reiterated previous ones lodged with the competent ministries and administrative bodies, to comment on draft laws and it has drafted two Special Reports—in addition to those provided by law in the context of the Ombudsman’s special powers—concerning the revenues of municipalities and the attachment of bank accounts for debts to the State.

THE OMBUDSMAN’S COMMENTS ON DRAFT LAWS

1. Comments on the draft law entitled “Urgent arrangements within the competence of the Ministry of Migration Policy” (Law 4587/2018)

The Ombudsman presented its observations on the draft law entitled “Urgent arrangements within the competence of the Ministry of Migration Policy”, based on the Ombudsman’s long and persistent engagement with a variety of issues regarding refugees and migrants, i.e. reception, asylum procedures, residence permits, integration permits, etc., with a view to contributing to the improvement of the proposed arrangement⁴⁵.

2. Comments on the draft law entitled “Reform of the institutional framework of Local Government” (Law 4555/2018)

The Ombudsman, in the context of its mandate and mediation in matters relating to local authorities and their companies, with a view to protecting the citizens’ rights, combating maladministration and ensuring compliance with law, submitted comments on the draft Law of the Programme “Klisthenis I”, which was filed on 4.7.2018 and then entered into force as Law 4555/2018⁴⁶.

The Ombudsman lodged detailed observations on all the articles, adding specific definitions and suggestions for improvement.

The Ombudsman’s overall observations are posted on the Authority’s official website⁴⁷.

45 <https://www.synigoros.gr/?i=kdet.el.news.541460>

46 OJ Series A 133/19.7.2018

47 <https://synigoros.GR/resources/20180713-paratiriseis-stp-Kleisisthenis.PDF>

3. The Ombudsman's positions on the bill “Measures for the Promotion of Fostering and Adoption Institutions” (N.4538/2018)

The Ombudsman, always acting in the best interest of the child, as stipulated in Article 3 of the International Convention on the Rights of the Child⁴⁸, presented its comments on the draft law “Measures for the Promotion of the Institutions of Fostering and Adoption”. The draft law aimed at meeting the need for improvements in fostering and adoption institutions for the protection of children who have no family or of the children who must be removed from their family to their best interest, as well as at reversing the existing model of children's care institutions.

In its observations, the Independent Authority stressed out cases in which the draft law provisions did not serve in the best way the apparent positive initial intention of its authors. The Ombudsman also remarked that the term “iothesia” (Greek word for adoption in) is rather outdated because from the etymological point of view (ios= son) as it does not correspond to the current legal and social reality, and pointed out that, considering the need to modernise the relevant legal terminology, it is preferable to use the term “teknothesia” (tekno=child)

The Ombudsman also noted that, as far as its substance is concerned, the draft seemed to confuse fostering provided in the Civil Code and fostering provided in the Presidential Decree 86/2009, i.e. private and state fostering, it did not provide for sufficiently differentiated preconditions concerning fostering by family members; as a result, it increased confusion between the two terms of fostering and adoption.

The Ombudsman proceeded to comment on specific articles and it submitted proposals for legal improvements⁴⁹.

4. The Ombudsman's observations on the draft law on the reception of applicants for international protection (Law 4540/2018)

On the basis of its specific competences and his long engagement in matters concerning asylum procedures, reception of asylum seekers and third country nationals, the Ombudsman submitted detailed observations to the Minister and to the competent Committee of the Parliament on the draft law of the Ministry of Migration Policy entitled “Adapting Greek legislation to the provisions of Directive 2013/33/EU (recast 29.6.13) defining the standards for the reception of applicants for international protection etc.”. The purpose of the Independent Authority was to contribute to the legislative initiative with a view to the proper transposition of the relevant European Directive and the guarantees of the applicants' fundamental rights, submitting at the same time concise comments on the proposal for the amendment of the Immigration Code.

The Ombudsman remarked that the chapter concerning the adaptation of domes-

48 Law 2101/1992

49 <https://www.synigoros.gr/?i=kdet.el.news.508897>

tic legislation to Directive 2013/33/EU was much more technically correct than the previous chapter of 2016 and more complete concerning the definition of terms of conditions for the reception of asylum seekers. In addition, it incorporated some of the Ombudsman's main proposals; other points, however, needed improvement.

Furthermore, the Ombudsman made observations on the amendments to the asylum procedures⁵⁰ and commented on the amendments to the Immigration Code⁵¹ by assessing some of them as positive measures for safeguarding the rights of third-country nationals, but expressed concerns and reservations on other issues, which it described in detail⁵².

SPECIAL REPORTS

1. Special report “Revenues of Municipalities and the Rule of Law”

In January 2018, the Greek Ombudsman published the Special Report on “Revenue of Municipalities and the Rule of Law”, concerning the imposition and collection of municipal taxes, based upon the findings and the conclusions reached during Ombudsman's twenty years work on the rule of law in the area of local tax system. The report presented on a case by case basis the main contributory fees, municipal taxes, levies and fines (cleaning charges, water charges, taxes on gross revenues, charges for the use of public spaces, fees for the construction of sewerage and water supply networks, real estate tax, cash contribution, traffic fines) and revealed the weaknesses of the main legislative instruments and administrative practices adopted by the municipal authorities for the enforcement and collection of said fees and taxes, which affect lawful tax imposition and undermine citizens' trust in the municipal financial authorities.

The citizen's complaints revealed the complexity, lack of clarity and inconsistency of the institutional framework for municipal revenue, as well as the long-term weaknesses of local authorities and central government, which lead to weaken both public interest and the rule of law. These drawbacks result in disputes between citizens and municipal agencies who often question the legality of the agencies' actions and the impartiality of the municipal authorities, refusing to comply with their obligations, either by lodging legal actions or by resorting to non-transparent means of debt settlement, thus affecting the municipalities' finances. At the same time, the report states the reasons preventing proper enforcement and collection of municipal revenue and sets out suggestions for the improvement thereof⁵³.

The Special Report was presented in the Town Hall of Thessaloniki on 9.2.1018 in

50 Law 4375/2016

51 Law 4251/2014

52 <https://www.synigoros.gr/?i=stp.en.news.496013>

53 <https://www.synigoros.gr/?i=state-citizen-relations.el.files.479564>

the context of a conference with the participation of representatives of the State, the judiciary, local government, academia and bar associations.

It was also presented in Larissa on 30.3.2018 with the participation of the Coordinator of the Decentralised Administration of Thessaly— Sterea Ellada and the President of the Regional Union of Municipalities (PED) of Thessaly.

Finally, the Regional Union of Municipalities of Western Greece hosted a workshop and a press conference for the presentation of the Special Report in Patras on 25.4.2018, with the participation of elected members of local government and officials from municipal financial authorities from Western Greece, Epirus and the Peloponnese.

2. Special Report “Attachments of bank accounts for debts to the State”

In September 2018, the Ombudsman published a Special Report entitled “Attachment of bank accounts for debts to the State”, which highlighted issues of concern, regarding both the legislative framework itself and its implementation.

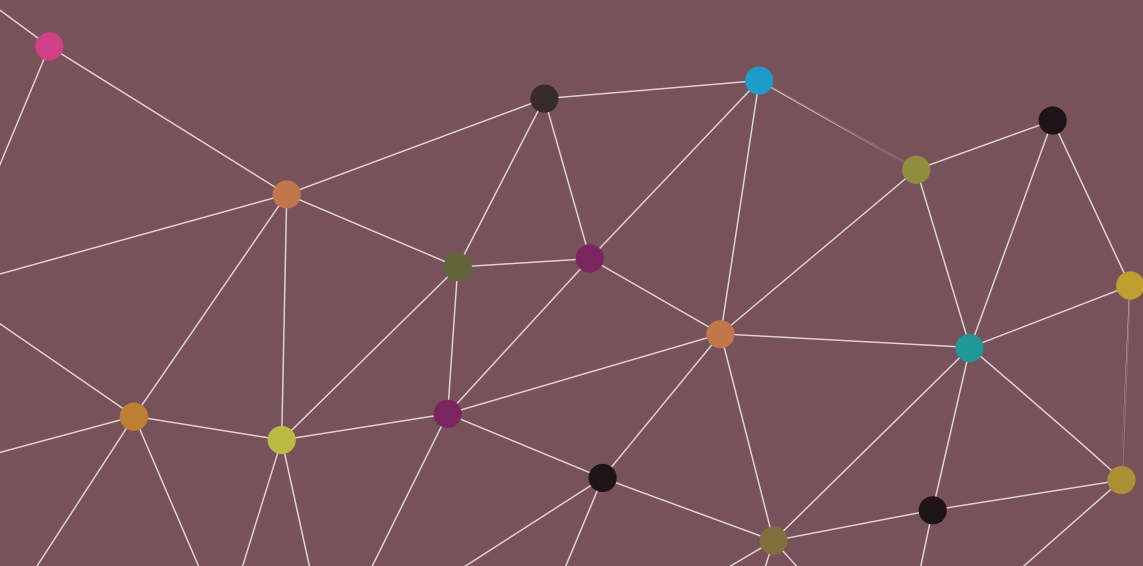
The report draws attention to the attachments surprising the debtors themselves and, in addition, jointly liable persons and heirs, problems arising from attachment of joint accounts, attachment of social welfare or special benefits, partial implementation of judicial decisions granting provisional protection when the judgment is subsequent to the attachment, issues regarding attachments of arrears as well as matters relating to attachment for debts to social security bodies (social security contributions).

The Special Report proposed a series of legislative measures aspiring to protect social welfare benefits, financial aid to farmers up to a certain amount, as well as to the amendment of specific provisions of the Public Revenue Collection Code and the Tax Procedure Code with the aim of limiting the element of surprise in attachments⁵⁴.

The Special Report was presented at a workshop on “Attachments of bank accounts for debts to the State” organised by the Ombudsman on 29.10.2018, with the participation of officials of the AADE, the Special Secretariat of Private Debt, the HBA, the EKPIZO, the ESAMEA, etc. ●

54 <https://www.synigoros.gr/?i=state-citizen-relations.en.recentinterventions.539635>

Referrals to the Public Prosecutor — Disciplinary Controls



1. Referrals to the Public Prosecutor⁵⁵

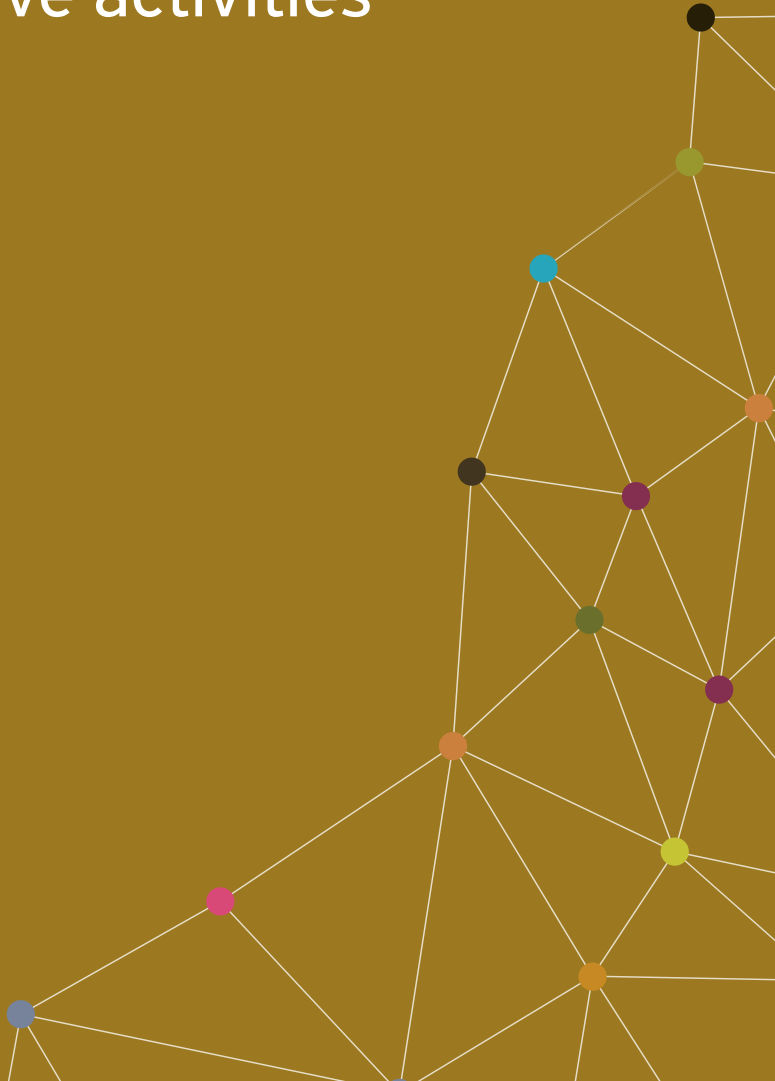
The Ombudsman referred to the competent public prosecutor's office cases of alleged breach of children rights.

2. Disciplinary Controls

The Ombudsman requested the disciplinary control of elected representatives, for the most part, on the grounds of legality of their actions and lack of cooperation with the Authority. ●

55 Law 3094/03 4 at para. 11

Communicative and Cooperative activities



COMMUNICATIVE AND COOPERATIVE ACTIVITIES

The Ombudsman is largely extrovert as an institution, oriented towards creating and maintaining partnerships, taking part in networks of equivalent institutions and international human rights mechanisms. At the same time, communication of its work remains a first priority as well as becoming accessible to all Greek Regions, so that having only one seat, in Athens, does not produce a negative effect on its interaction with citizens outside the capital. Events, meetings, participation in seminars and actions of other Greek and international bodies are an integral part of its activities. The relevant activities are listed below, while more information is available on the site of the Authority www.synigoros.gr that is continuously updated not only in Greek but also in English, regarding news and activities of international interest.

1. Events

The Ombudsman organised:

- Workshop on ***“Human rights in detention centres”*** at the Athens Bar Association auditorium, under its mandate as the OPCAT (7/12/2018)⁵⁶.
- Conference on ***“The external monitoring of Forced Return and the strengthening of fundamental rights”*** in the Auditorium of the National Research Foundation, with the participation of European experts (26/11/2018).
- Conference on ***“The external monitoring of returns and the strengthening of fundamental rights”*** in the Auditorium of the National Research Foundation, with the participation of European experts (26/11/2018)⁵⁷.
- Conference to present the special report on ***“Attachments of bank accounts for debts to the State”*** at the Athens Chamber of Commerce and Industry. Officials of the AADE, the Special Secretariat for Private Debt Management, the HBA, the EKPIZO, the ESAMEA and others participated (29/10/2018)⁵⁸.
- Workshop for the presentation of the special report entitled ***“Revenue for municipalities and the rule of law”***⁵⁹ in the Town Hall of Thessaloniki, bringing together representatives of the State, the Judiciary, the Local Government, the academia and bar associations (9/2/2018)⁶⁰.

56 <https://www.synigoros.gr/?i=kdet.el.news.537617>

57 <https://www.synigoros.gr/?i=stp.en.news.536709>

58 <https://www.synigoros.gr/?i=kdet.el.news.528649>

59 <https://www.synigoros.gr/?i=stp.en.news.481881>

60 The special report was also presented in Larissa on 30.3.2018 with the participation of the Co-ordinator of the Decentralised Administration of Thessaly, Sterea Ellada and the President of the Regional Union of Municipalities (PED) in Thessaly, as well as in Patras, at a workshop hosted by Regional Union of Municipalities (PED) of Western Greece on 25.4.2018, with the participation of elected local authorities, as well as officials of the municipalities' financial authorities of the

2. Speeches - Presentations

The Greek Ombudsman Andreas Pottakis participated as a speaker, indicatively:

- At the annual conference of the **British and Irish Ombudsman Association**, which took place in Edinburgh on 24-25 May.
- At the debate organised in the conference of **the European Network of Ombudsmen** in Brussels (8-9 March 2018), with the participation of the European Ombudsman, Emily O'Reilly, the President of the European Economic and Social Committee, Georges Dassis and Ombudsmen from around Europe. The main topic of the debate, entitled "THE FUTURE OF THE EU - ENSURING AN INCLUSIVE AND FAIR SOCIETY FOR CITIZENS", were social rights and the conference focused on whether the Ombudsmen believe that the future of Europe should be shaped in such a way as to ensure inclusive societies for all citizens. In his speech, the Ombudsman stressed that a fair and socially inclusive Europe must be at the heart of the debate concerning the future of the European Union.⁶¹

3. Major Cooperations

3.1 With the International Ombudsman Institute (IOI) for the issue of refugees and immigrants

Andreas Pottakis, the Greek Ombudsman, in his capacity as an elected member of the board of the European Office of the **International Ombudsman Institute** (IOI), consisting of more than 190 members worldwide and more than 80 members in Europe, participated in a series of conferences and meetings with his counterparts in Brussels, the Basque Country (Bilbao) and Belfast, Ireland.

In particular, he cooperated in the refugee-immigration issue with his counterparts in the Netherlands and the Basque Country, but also with the Spanish representative of the UN High Commissioner for Refugees in the Basque Country. In the context of the aforementioned cooperation, **a thorough, comprehensive study of the management of refugee flows** has been carried out, focusing on benchmarking policies and practices at a national, regional and local level⁶². This study examines all stages and phases of the refugee population management, from registration, identification and handling applications for international protection to integration policies for those granted protection and return procedures for those, whose requests will be rejected. Special mention is also made of the highly sensitive issue of minors, and especially the unaccompanied minors, as well as other vulnerable groups⁶³.

The Greek Ombudsman also presented, in the context of the meeting of the Board of Directors of the International Ombudsman Institute in Brussels, **his evaluation report**

Western Greece, Epirus and the Peloponnese.

61 <https://www.synigoros.gr/?i=stp.en.news.487784>

62 <https://www.synigoros.gr/?i=childrens-rights.en.news.446301>

63 Special Policy Modules, Policy Asylum, p (?)

on the programme for the relocation of asylum seekers in September 2015 — September 2017. The report assesses the Greek experience with the implementation of this extraordinary, two-year-long-measure of the Council of the European Union (EU)⁶⁴, for the relocation and allocation of asylum seekers from Greece and Italy to other EU Member States.

3.2 With the Dutch Ombudsman

The Greek Ombudsman inaugurated a close cooperation with its Dutch counterpart in order to exchange know-how and best practices for a more effective functioning of the Authority, as well as for migrant and refugee flows management. In the course of this cooperation, working meetings between officials of the two Authorities took place during the year. In addition, on 9.5.2018 the Dutch Ombudsman Reinier van Zutpen, during his visit in Greece, met with the Greek Ombudsman, addressed the Authority's personnel and replied to questions regarding the way that the Dutch Independent Authority has organised its mediation procedures. At the same time, the Dutch Ombudsman presented the recent innovations undertaken in order to modernise and transform the institution⁶⁵.

3.3 With the High Commissioner for Human Rights in the Russian Federation

The Ombudsman participated in an international congress in Moscow (7-10.10.2018) on strengthening the cooperation of Ombudsmen and Equality Bodies for the protection of human rights in the strategic area of Eurasia, invited by his Russian counterpart. The two authorities signed a **memorandum of cooperation** underlining the importance of joint action by independent authorities and the exchange of best practices for the effective protection of human rights⁶⁶.

3.4 With the Council of Europe

The Ombudsman participated in a consultation in Paris on 31.10.2018 with the task force of the local Office of the Council of Europe. The aim of the meeting was to exchange views both with the international institutions of the Ombudsmen and with international stakeholders, with a view to providing guidelines which should prevail in the establishment and operation of Ombudsmen, while respecting national specificities and differences.

Also, in the context of the ongoing cooperation of the two institutions, the Ombudsman held on 25.6.2018 a meeting with the Commissioner for Human Rights of the

64 to 26.9.2017

65 <https://www.synigoros.gr/?i=stp.en.news.497386>

66 <https://www.synigoros.gr/?i=stp.en.news.538101>

Council of Europe Dunja Mijatovic in the context of her short time visit in Greece and in view of her report on Greece.

Finally, the Ombudsman participated in the annual seminar against racism and intolerance for the Member States, under the auspices of the Council of Europe, held on 24 May in Strasbourg. Meetings were also held on May 22 by the Ombudsman with his counterparts in the Netherlands, the Basque Country and representatives of the Council of Europe.

3.5 With the European Ombudsperson

The European Ombudsperson, Emily O'Reilly, following an invitation by the Greek Ombudsman, held a two-day visit to Athens (20-21.2.2018) in the framework of the cooperation of the two institutions on a number of issues concerning the relations between Greek citizens and the European institutions.⁶⁷

3.6 With the Commissioner for Administration and Protection of Human Rights of Cyprus

The Ombudsman had a series of meetings with his counterpart, the Commissioner for Administration and Protection of Human Rights of Cyprus, Maria Stylianou-Lottides in the offices of the Independent Authority (13.6.2018), with a view to strengthening and promoting cooperation between the two institutions on issues of common interest, but also, more generally, with regard to the action of Ombudsmen in the Mediterranean region. The meetings were held in the framework of the two-day visit of the Commissioner to Athens⁶⁸.

3.7 With the President of the China Foundation for Human Rights Development

The Ombudsman visited the former Vice President of the National Committee of the Chinese People's Political Consultative Conference and current president of the China Foundation for Human Rights Development, Huang Mengfu, as part of its European tour (18.6.2018). Huang Mengfu was informed by the Greek Ombudsman of the Authority's modus operandi and best practices in the field of safeguarding and protection of human rights, thus **inaugurating cooperation for the establishment of the Ombudsman in China**⁶⁹.

3.8 With the Human Rights Ambassador of the Netherlands

The Ombudsman met in Athens with the Human Rights Ambassador of the Nether-

67 <https://www.synigoros.gr/?i=stp.en.news.487778>

68 <https://www.synigoros.gr/?i=stp.en.news.504789>

69 <https://www.synigoros.gr/?i=kdet.el.news.504544>

lands, Kaas van Baar⁷⁰ during his visit to Greece, which took place in the context of his country's particular interest **in the issue of refugees and immigrants.**

3.9 With the National Mechanisms for the Prevention of Torture of Great Britain and Australia

In the exercise of its competence as an OPCAT, the Ombudsman carried out a joint programme with its British counterpart and the Criminology Centre at the University of Oxford and an educational seminar on 28.9.2018 at the office of the Authority, on the methodology to carry out inspections in places of criminal and administrative detention, report-drafting, submission of observations/recommendations to the administration and the monitoring of their implementation.

In addition, the Australian Detention Inspector and OPCAT implementation manager, Steven Caruana, accompanied by the Greek Ombudsman's staff visited the pre-removal detention centre of Amigdaleza (7.3.2018) to identify problems that may arise in the practical application of the procedures under Law 3907/2011 and Law 4375/2016, as well as the legislation relevant to granting international protection.

4. Visits in the Regions - Inspections

4.1 Visits in the Regions

In 2018 the Public Ombudsman launched a new practice, which is to take place on an annual basis. The Ombudsman, Deputy Ombudsmen and staff members took part in visits in all the Regions of the country. In these visits, large meetings were held with officials, dealing with pending complaints, inspections and audits were carried out and discussions and interventions were organised in order to raise awareness and make the Authority's mandate and actions widely known.

The outcome of those visits was the acquaintance of the Ombudsman with local communities, political and scientific bodies in the respective Region and citizens. The positive response to this action, reflected in the high level of resolution of pending complaints, and the communication of the institutional role of the Authority, inspire the repetition of this initiative, if possible, by the financial technical and operational abilities.

In detail, the Public Ombudsman made the following visits:

- | | |
|-------------------------|------------------------------|
| • 29.1.2018 - 2.2.2018 | Region of Western Greece |
| • 26.2.2018 - 2.3.2018 | Region of Crete |
| • 26.3.2018 - 30.3.2018 | Region of Thessaly |
| • 25.4.2018 - 27.4.2018 | Region of the Ionian Islands |
| • 4.6.2018 - 8.6.2018 | Region of Southern Aegean |
| • 25.6.2018 - 29.6.2018 | Region of Western Macedonia |

⁷⁰ <https://www.synigoros.gr/?i=stp.en.news.504804>

- 18.9.2018 - 21.9.2018 Region of Sterea Ellada
- 12.11.2018 - 16.11.2018 Region of Peloponnese

4.2 Inspections/visits

In addition to the full-scale visits, the Authority held frequent visits and inspections to places where the presence of the Authority is important for both the officials and inhabitants, such as pre-removal centres, detention facilities and reception and identification centres for migrants and refugees (“hotspots”). Inspections and working visits are also carried out for cases involving major environmental issues. ●

Enhancement of the Legal Framework and Staffing of the Ombudsman



INSTITUTIONAL FRAMEWORK AND STAFFING

1. Enhancement of the legal framework in 2018

The following legislation has been put into effect in 2018, which relate to the Ombudsman's function:

- Law 4512/2018, Article 105 (6)
- Law 4538/2018, Article 2 (4) (and the implementing JMD "Regulation on the Operational Programme for Rural Development", Article 4 (4))
- Law 4555/2018, Article 115, 160 (9), 162 (3), 170, 171 (2), 173, 256 (3).

2. Organisation and staffing of the Ombudsman

The human resources (scientific and administrative) of the Ombudsman in 31.12.2018 amounted to 205 staff members, including the Ombudsman and the 6 Deputy Ombudsmen, out of which 54 men (26.5 %) and 151 (73.6 %) women. The scientific staff consists of 135 senior investigators and the administrative staff consists of 63 employees.

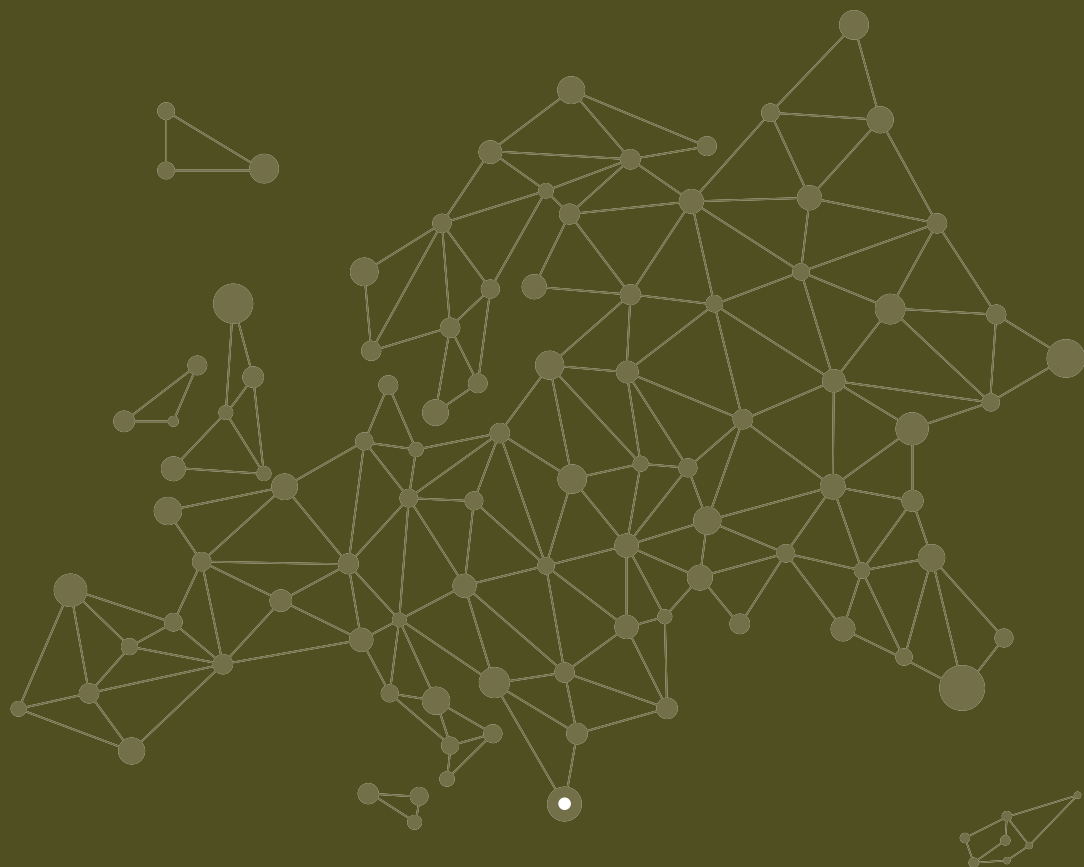
Among the scientific personnel 40 people (29.6 %) are doctorate holders (PhD), 77 (57 %) are holders of a postgraduate title and 18 (13.3 %) are university graduates. Among the administrative staff of the secretariats, 2 persons (3.2 %) are doctorate holders (PHD), 20 persons (31.7 %) are holders of a postgraduate title, 14 (22.2 %) are university graduates, 4 (6.4 %) hold a degree from Technological Education, 20 (31.7 %) hold a secondary education certificate, and 3 (4.7 %) hold a compulsory education certificate.

The staff covers a wide range of scientific expertise. Among them are: 85 lawyers, 12 political scientists, 5 classical studies graduates, 1 theologian, 10 economists, 11 sociologists, 8 archaeologists, 4 communication scientists, 2 architects, 5 psychologists, 3 geologists, 1 physicist, 1 chemist, 2 chemical engineers, 2 civil engineers, 2 scientists of education, 1 graduate of statistics and insurance science, 2 administrative scientists, 1 medical doctor, 2 survey engineers, 5 IT scientists, 2 librarians and 1 archivist, 6 business administration graduates, 4 humanities graduates, 1 graduate of health units management, 1 translator and 2 journalists.



ABBREVIATIONS

AADE	Independent Authority for Public Revenue
AKAGE	Mutual Funds of Support of the Generations
AMKA	Social Security Number
DEH-DEDDIE	Public Power Corporation
DEYA	Hellenic Association of Municipal Enterprises for Water Supply and Sewerage
DOATAP	Hellenic NARIC
ECtHR	European Court of Human Rights
EETT	Hellenic Telecommunications and Post Commission
EFKA	United Public Social Security Body
EKAS	Social Solidarity Pensioner Benefit
EKDDA	National Centre for Public Administration and Local Government
EKOEMS	Special Financial Aid Section for Army Dividend Beneficiaries
EKPIZO	Consumers' Association "The Quality of Life"
ELOT	Hellenic Organization for Standardization
ELT	Directorates for Aliens and Immigration
ELTA	Hellenic Post
EOPYY	National Organization for the Provision of Healthcare Services
ESAMEA	National Confederation of Persons with Disabilities
ETAA	Single Fund for the Self-Employed
ETEAP	Single Fund for Supplementary Insurance and Lump-Sum Benefits
EYDAP	Athens Water Supply and Sewerage Company
FEK	Official Journal
GLK	General Accounting Office
HBA	Hellenic Bank Association
IAPR	Intra-European Organisation of Tax Administrations
IKA	Social Security Institute
IKA-ETAM	Social Security Institute - Single Employer Insurance Fund
IOI	International Ombudsman Institute
JMD	Joint Ministerial Decree
KEAO	Social Security Debt Collection Centre
KEPA	Disability Certification Centres
MTS	Army Equity Fund
NARIC	National Academic Recognition and Information Centre
NPM	National Preventive Mechanism
NSRF	National Strategic Reference Framework
OAED	Manpower Employment Organisation
OAEE	Social Insurance Organisation of Freelance Professionals
OPCAT	Optional Protocol to the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment
PED	Regional Association of Municipalities
PPC	Public Power Corporation
PWD	People with Disabilities
SAEP	Council for the Recognition of Professional Qualifications
SEKT	School of Physical Education and Sport Science
SEPE	Labour Inspectorate Body
UN	United Nations
WHO	World Health Organisation



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