

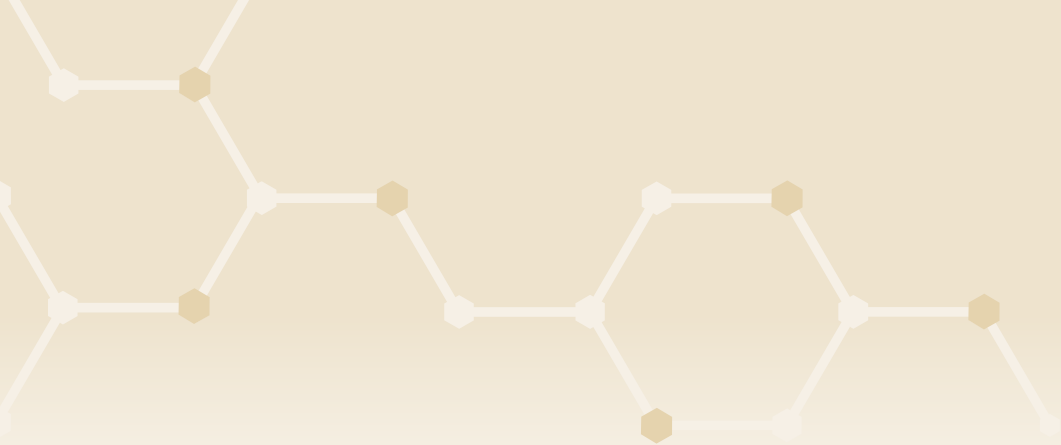


ANNUAL REPORT

2019

Executive Summary



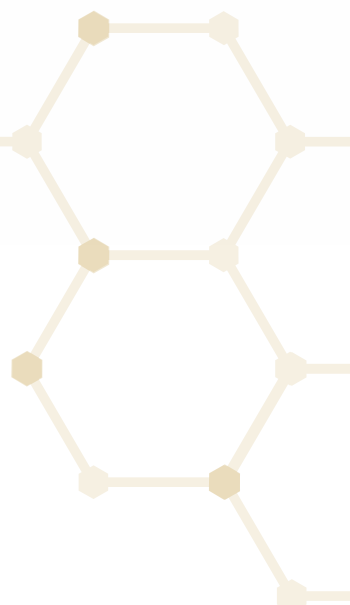


THE GREEK OMBUDSMAN **ANNUAL REPORT** **2019**

Executive Summary



THE GREEK
OMBUDSMAN
INDEPENDENT AUTHORITY



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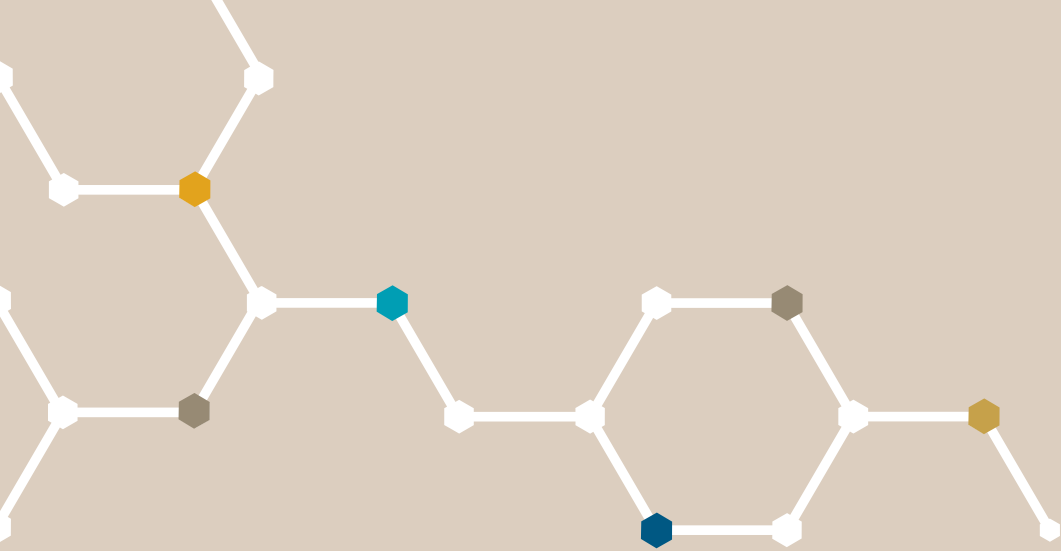
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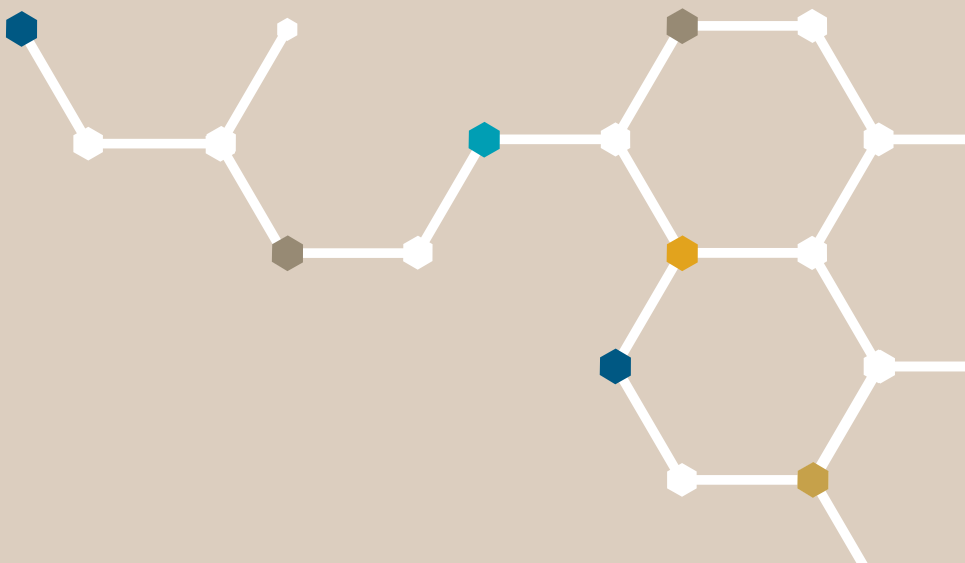
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INTRODUCTION



The Ombudsman for 2019



Having concluded the phase of implementation of inflexible fiscal adjustment programmes, the country is in search of a new equilibrium. To heal the wounds in social cohesion, to rectify injustices, to strengthen the rule of law, to safeguard the rights of all citizens. The process will inevitably be gradual, although not necessarily slow. This is not only because of commitments to strict budgetary discipline and ambitious fiscal objectives. The loss of about $\frac{1}{4}$ of the country's wealth in the decade of the fiscal and economic crisis, did not only degrade the standard of living of each and every one of us. It also contributed decisively to the disorganisation of the administrative mechanism, which serves as a pillar for sustainable and balanced economic development and social justice. Furthermore, it contributed to the deconstruction of the social state, the shrinkage of welfare administration and the weakening of the control mechanisms of the State.

This new equilibrium, however, cannot and should not be sought in a return to the previous situation, that is, the return to the pre-memoranda Greece of the previous decade.

In 2019, the first "post-memorandum" year should mark the starting point in search of this new equilibrium, not only symbolically but also in essence. There is a deep-rooted relationship of suspicion between State and citizens, a sense of distrust that is, in fact, reciprocal. The big challenge is to bring about a sincere relationship of trust between the two. Public administration in the previous years of fiscal adjustment was called upon to implement successive reforms, many of which remained incomplete or proved to be ineffective. It experienced hasty and often not well-thought-out transformations and restructurings, while suffering an overwhelming reduction in personnel and resources. As expected, its effectiveness often did not meet the requirements and the quality of services provided was lower than expected.

Public administration should be a dynamic organisation, aiming at the provision of high-quality goods and services, where necessary, at the effective and substantive control of activities, at the strict adherence to the principles of meritocracy, transparency, legality, but also clemency and proportionality. Through constant search for simpler and more effective procedures, for the benefit of citizens as well as civil servants. Through

streamlining the criteria, terms and conditions of access to the labour market, for the reversal of the 'brain-drain' phenomenon, through transparent, lawful and controlled processes for the development of business and economic activity. Through combating administrative distortions and rigidities, bureaucratic obstacles and injustices. Through substantial incentives to public officials, in order for them to contribute their best, which shall enable the malfunctions of the system to be overcome rather than accepted and perpetuated. In fact, substantial change will result from the constant search for answers to the basic, the fundamental questions: what kind of administration we want and can have. What role should it have in the current circumstances, in the ever-evolving European environment?

As 2019 was the starting point of a new era for public administration, economic activity and society as a whole, for the institution of the Ombudsman it was equally a year of regrouping and redeployment of its forces. Targeting to remain effective, useful and substantial in its interventions. Without phobic syndromes, confident in its discourse, fully aware of its role. Even more extroverted, with a view to protecting the rights of citizens and residents of the country and improving public administration. So as to maintain the high levels of domestic acceptance and international recognition. With the continuous aim of upgrading its infrastructure, the renewal of its structures, the revision of its functions. While at the same time claiming new institutional tools, stronger legitimacy, functional completeness and guarantees of independence, with reference to the "Venice Principles", a common framework of principles governing the institution of the Ombudsman, which the Council of Europe has developed and approved for its member states.

The institution of the Ombudsman was indeed born in countries with high standards of public administration, rather than low. In countries with a long tradition of accountability and transparency in public life. Its supervisory jurisdiction constitutes an additional protective layer for the citizen against arbitrariness in both the public and the private sectors. A decisive institutional counterweight, an essential guardian of the rule of law. It is not by chance that the institution of the Ombudsman has spread to all continents today. And among the pioneers, stands the institution in our country. A protagonist among its counterparts in the wider Mediterranean area, as well as within the European family, it is recognised as a valuable and reliable partner of the EU institutions, the UN and the Council of Europe, having assumed the role of a national body protecting citizen rights and monitoring the implementation of the State's international commitments. It stands as a respected interlocutor of the State,

whose the latter often seeks the assistance, proposals and recommendations. Even when the Ombudsman's input is unpleasant, criticising and showcasing errors, injustices and distortions, the State listens. Because its positions are based on objective, well-documented, irrefutable analysis; alternatively, when the Authority provides valid reliable information on the limits of citizens' rights and the legality of the citizens' obligations, even the most sceptics among them accept that they have not been wronged nor any of their rights violated, when this is apparent from the well-documented views of the Ombudsman.

Without the intermediary, supervisory, monitoring and operational powers of the Authority, administrative costs and judicial load would far exceed the current levels, affecting the prospects of sustainable development and social cohesion. A State without a strong and independent Ombudsman is deficient in transparency, legitimacy, effectiveness and democracy. It is certainly deficient in humanity.

Andreas I. Pottakis

The Greek Ombudsman

The imprint of the year

The Ombudsman seeks in principle to handle the obstacles that afflict citizens who resort to it in their dealings with Public Administration. At the same time, through its interventions, the Authority steadily seeks to eliminate bureaucracy and consolidate an administrative culture focused on the citizen, on the subject of the administration, on the resident of the country. For yet another year, the Ombudsman has made an effort to highlight the failures, deficiencies, malfunctions and rigidities that exist at all levels of the Administration and all objects falling within its remit. At the same time, avoiding unproductive criticism, the Ombudsman intervened with proposals, recommendations and comments, regarding legislation, policies and practices of public administration.

Through its widened remit in promoting the principle of equality, combating discrimination, protecting the rights of PWD, defending and promoting the rights of the child, protecting the rights of detainees as well as third-country returnees, and in general in the protection of human rights, the Ombudsman has become a body safeguarding the rule of law, democracy and social justice. In addition, becoming the National Mechanism for the investigation of arbitrary incidents by the Police, the Hellenic Coast Guard, the Fire Department and Staff of State Penitentiaries has constituted the de facto declaration of the Ombudsman's independence, impartiality and prestige.

As the intensity of the economic, social and political crisis that has sealed the country in recent years seems to be diminishing, the Ombudsman gradually withdraws from handling urgent and hastily issues and returns to its purely institutional mission. The control of proper administrative action and behaviour, the protection of citizens' acquired rights, the showcasing of their individualities and needs, the elimination of the citizens' mistrust towards the State are restored as the most crucial, complex and demanding roles of the Ombudsman. In this context, the institution focuses once more on the pathogenicities of the State, documents State-citizens relationships, elaborates and proposes solutions which are appropriate, realistic and anthropocentric, focusing on today's challenges at every level, social, economic, technological, environmental.

Once again this year, the Ombudsman has proved that it acts as an ally both of the citizen and of the State, proving that the interests of both sides do not conflict but complement each other, since respect for the principles and values of law, protection of the vulnerable and more efficient functioning of State structures and mechanisms constitute funda-

mental manifestations of public, and therefore collective interest, which is served by each and every member of the Ombudsman's staff.

Evanthia Benekou-Zoi Karamitrou

The Central Editorial Team

2019 at a glance

In 2019, the Ombudsman deployed its action in the field of its main remit - mediation with the public administration at all levels - as well as in the field of its specific and additional competences and mandates. These activities are presented below in chronological order, in a concise and practical manner.

The preparation and publication of special reports concerning the aforementioned specific competences, as provided by law, responded to the Ombudsman's requirement for transparency and accountability. However, specific reports have also been drawn up at the choice of the Ombudsman, based on the seriousness of the issues, enabling us to display our intervention, which was characterised by a painstaking, in-depth, meaningful representation of the problems, as well as the submission of proposals for targeted, realistic and practical solutions.

The repeated elections impeded the steady will of the Ombudsman for regular visits in the Regions, which always provide the Ombudsman and the citizens with information and confirm the anthropocentric nature of the institution.

Finally, the Ombudsman has been extrovert at the international level, consolidating its position as a point of reference for international cooperation initiatives, targeting the exchanges of experience and work tools for carrying out various projects as well as upgrading the status of the institution to that of a key interlocutor.

From the important communication work of the Ombudsman, for which our official website www.synigoros.gr offers full information, we have selected the following events:

10 January: The Ombudsman, Andreas Pottakis, participates in a Round Table organised by the Supreme Court Prosecutor's Office in collaboration with the Council of Europe on "Treatment of Persons in detention and related consequences"

30 January Lecture by the Ombudsman at an international conference on "Democracy in Crisis" at the Acropolis Museum

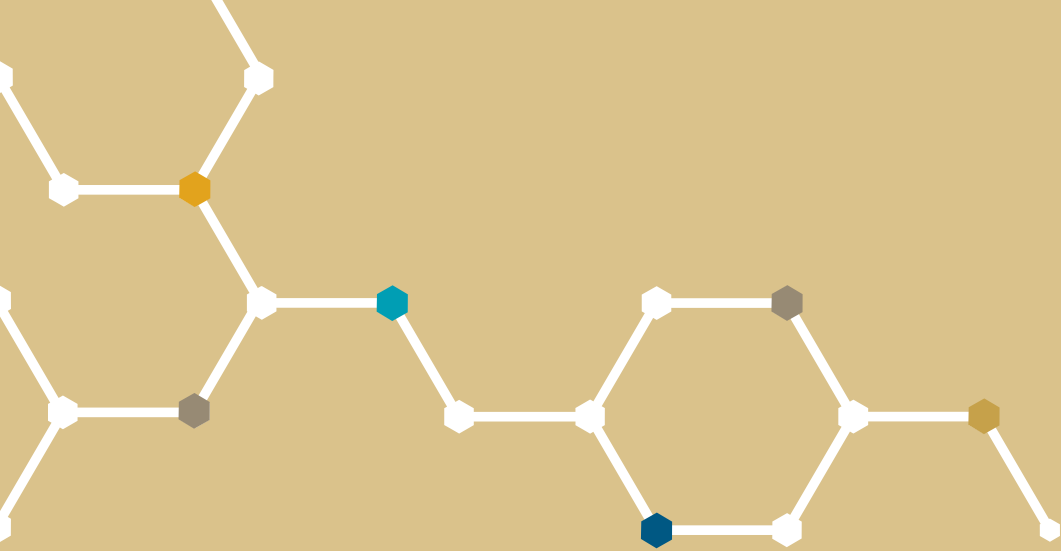
7 February: The Ombudsman meets with Simon Mordue, Deputy Director-General of the Directorate-General for Migration and Home Affairs of the European Commission.

- 20-22 February:** The institution celebrates its 20 years of operation with an anniversary event at the Stavros Niarchos Foundation Cultural Centre, in the presence of the President of the Republic and a two-day international conference on “State and Society — Challenges for to Rights and Freedoms”, in the Parliament building
- 20 February:** On the occasion of the meeting of the Board of Directors of the European Sector of the International Ombudsman Institute (IOI) in Athens, the Greek Ombudsman’s report on the relocation programme for asylum seekers is made public
- 21 February:** Co-operation agreement signed between Greek, Serbian and Ukrainian Ombudsmen
- 21 February:** The Ombudsman meets with its Russian counterpart, Tatyana Moskalkova and the Irish Ombudsman Peter Tyndall
- 12 March:** The Greek Ombudsman assumes the Presidency of the Association of Mediterranean Ombudsmen (AOM)
- 15 March:** As President of the Association of Mediterranean Ombudsmen, the Ombudsman participates in the 118th Plenary of the Venice Commission of the Council of Europe
- 19 March:** The Greek Ombudsman, accompanied by the Ombudsmen of the Basque Country, Manuel Lezertua, and of the Netherlands, Reinier van Zutphen, holds successive meetings with the European Commissioner for Migration, Home Affairs and Citizenship, Dimitris Avramopoulos and the Vice-President of the European Commission Frans Timmermans in Brussels. He also holds a meeting with the European Commissioner for Humanitarian Aid and Crisis Management Christos Stylianides
- 22 March:** The 20th Anniversary Annual Report of the Ombudsman for the year 2018 is handed over to the Speaker of the Hellenic Parliament

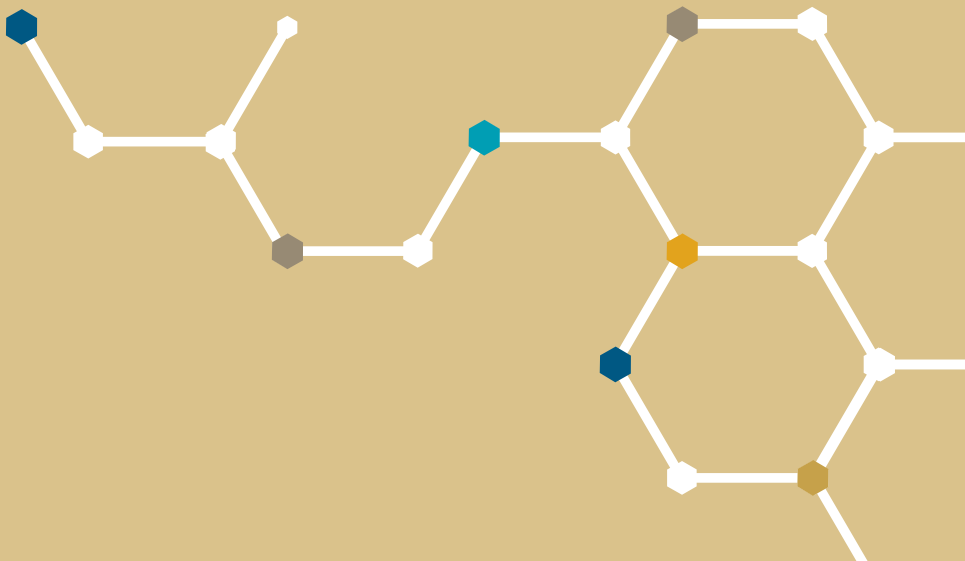
- 04 April:** The Special Permanent Committee on Institutions and Transparency of the Hellenic Parliament is updated by the Ombudsman and the Deputy Ombudsmen on the Ombudsman's Annual Reports of 2016, 2017 and 2018
- 5 April:** Speech by the Ombudsman at Brunel University in the UK on respecting human rights and management of refugee and migration flows
- 18 April:** The Ombudsman organises a workshop in cooperation with the Regional Centres for Educational Planning (PEKES) aiming at informing and educating teachers on the rights of the child in everyday school life
- 22-23 May:** At the initiative of the Ombudsman, the independent authorities of ten EU Member States meet in Nafplio and decide to establish an independent mechanism for external control of forced returns at European Union level, in order to defend fundamental rights during these operations.
- 14 June:** In collaboration with UNICEF, the Ombudsman publishes the 2018 Report "The Rights of Children on the Move in Greece"
- 23 July:** Presentation of the Ombudsman before the UN Commission against Torture in Geneva
- 30 July:** The Ombudsman's first Annual Report as a Framework for promoting the implementation of the UN Convention on Persons with Disabilities is published and submitted to the relevant United Nations Commission
- 7 August:** The Ombudsman publishes its special report for the year 2018 in its capacity as a promoter of the principle of Equal Treatment
- 20 August:** The Ombudsman publishes its first special report as National Mechanism for the investigation of arbitrary incidents by the Police, the Hellenic Coast Guard, the Fire Department and the Staff of State Penitentiaries

- 16 September:** The Ombudsman organises a conference on “The Greek Ombudsman 2020 - Strategic Planning”
- 17 September:** The Ombudsman, in cooperation with the Regional Centres for Educational Planning (PEKES) organises a series of training workshops for school heads, with emphasis on the themes of abuse/neglect and the integration of children in the educational process
- 30 September:** The Special Report of the Ombudsman “State aid in the Agricultural Sector & Primary production” is published and presented at an event in the city of Larissa
- 11 October:** The Greek Ombudsman meets with a delegation of Czech MPs, members of the Czech Parliament Memorandum Committee, during their official visit to the country
- 14 October:** The Ombudsman’s special report entitled “Recognition of foreign qualifications and professional rights” is published and presented at an event in Athens
- 23 October:** The Ombudsman submits its observations on the draft law on international protection to the Minister of Citizen Protection and the relevant committee of the Parliament
- 23 October:** The Ombudsman’s report on the implementation of the UN Convention on the Rights of Persons with Disabilities is presented to the Hellenic Parliament Subcommittee on Issues of Persons with Disabilities
- 25 October:** The Ombudsman organises a conference on the investigation of arbitrary incidents by the Security Forces on the occasion of his first report as an independent National Mechanism for the investigation of arbitrary behaviour of the Police, the Hellenic Coast Guard, the Fire Department and the Staff of State Penitentiaries
- 1 November:** The parallel report of the Ombudsman on the implementation of the International Convention on the Rights of the Child is sent to the United Nations

- 5 November:** The Ombudsman organises a workshop entitled “Labour Relations & Equal Treatment” on the occasion of its annual special report on Equal Treatment
- 18 November:** The Greek Ombudsman is elected first among its counterparts in the European Section of the International Ombudsman Institute (IOI)
- 29 November:** The Ombudsman publishes its 2018 annual special report as the National Prevention Mechanism under Law 4228/2014 that ratified the Optional Protocol to the UN Convention against Torture (OPCAT)
- 2 December:** The Greek Ombudsman Andreas Pottakis together with his counterpart Peter Svetina, Slovenian Human Rights Ombudsman and the Assistant Ombudsman, Ivan Selih, who were on an official visit to Greece, briefed the members of the Standing Committee on Public Order and Justice and the Subcommittee on People with Disabilities of the Special Permanent Committee on Equality, Youth and Human Rights of the Hellenic Parliament.
- 9 December:** In his capacity as President of the Association of Ombudsmen of the Mediterranean Countries (AOM), the Greek Ombudsman gives a speech at the Conference of the AOM on the principles of the “Venice Commission”, in Cyprus
- 17 December:** The Ombudsman’s annual special report as the National Preventive Mechanisms against torture and other cruel, inhuman or degrading treatment or punishment is presented to the Standing Parliamentary Committee on Public Administration, Public Order and Justice.



THE STATISTICAL OUTLINE OF THE YEAR



THE STATISTICAL OUTLINE OF THE YEAR

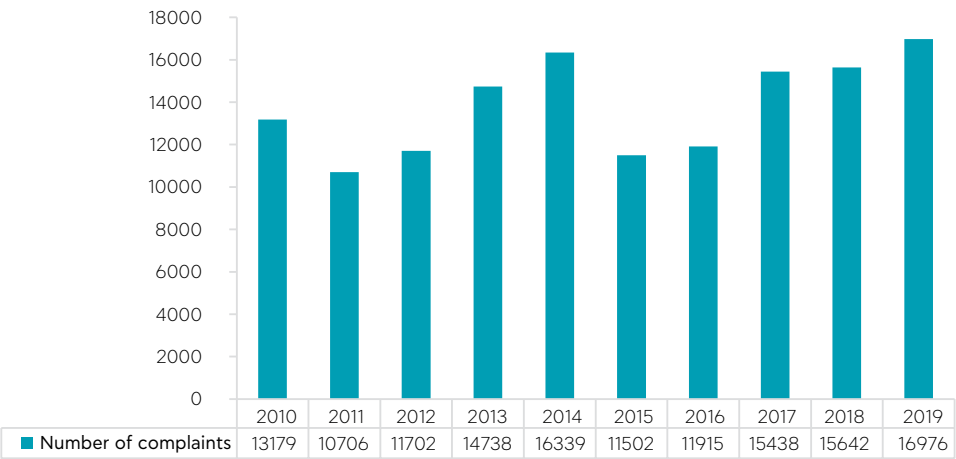
THE PICTURE OF THE PROBLEMS IN THE RELATIONS BETWEEN PUBLIC ADMINISTRATION AND CITIZENS, THROUGH THE COMPLAINTS FILED WITH THE OMBUDSMAN IN 2019

1. Number of complaints and thematic categories

The number of complaints filed to the Ombudsman in 2019 is the highest of the decade, continuing the upward trend recorded over the last five years. The increase in incoming complaints compared to 2018 is almost 9%. Over the past five years, the increase in complaints reached 50 %, from 11,502 in 2015 to 16,976 in 2019.

Graph 1

Number of complaints 2010-2019

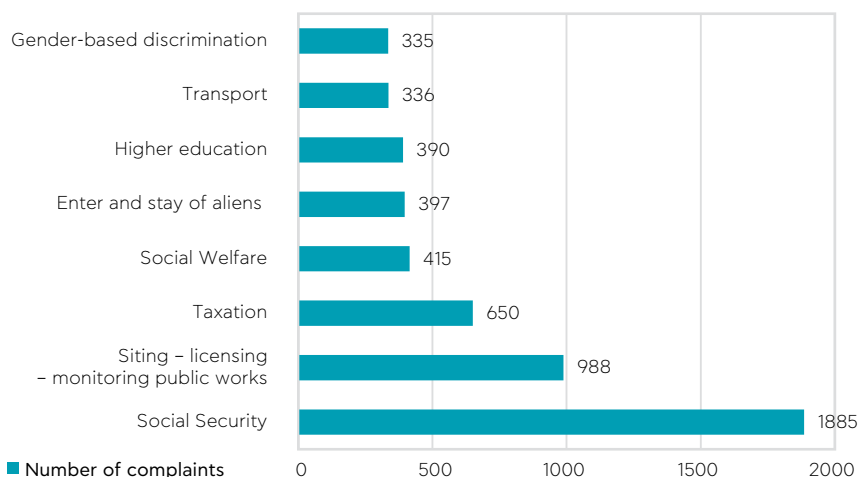


Looking at the distribution of complaints into thematic subcategories, we observe that the five categories with the largest number of complaints present an impressive stability over time (see Graph 2 and 2a).



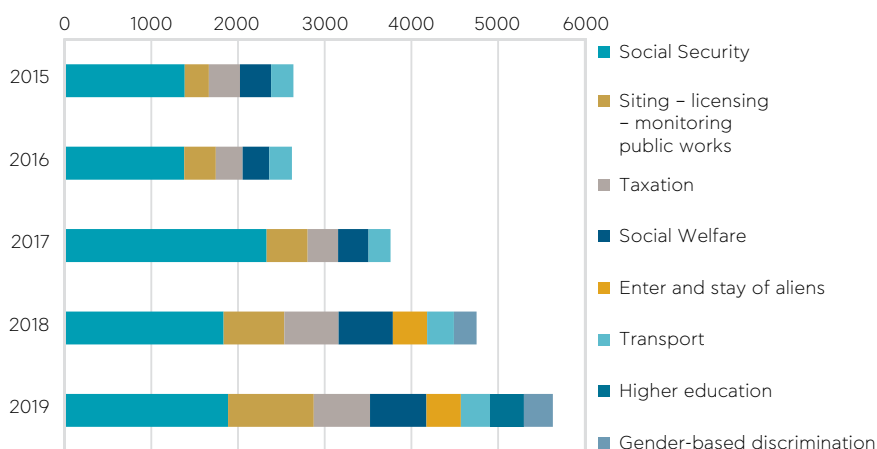
Graph 2

Thematic categories with the larger number of admissible complaints, 2019



Graph 2a

Thematic categories with the larger number of admissible complaints, 2015-2019



Particular reference should be made to the increasing trend of the main thematic categories with the largest number of complaints over time. Up to 2015 the percentage represented by these thematic categories did

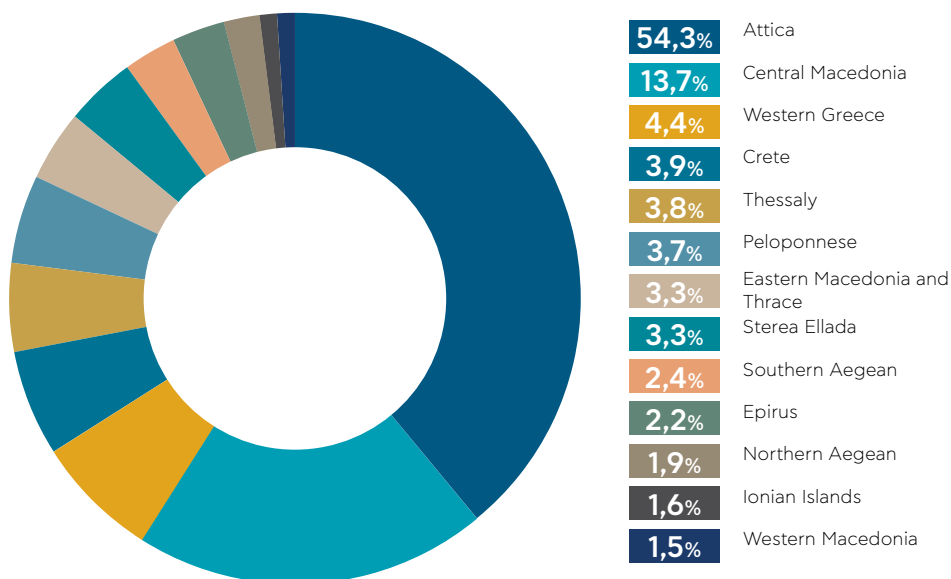
not exceed 50 % of the total admissible complaints to the Ombudsman. In 2019 the concentration of complaints in the main thematic categories was 65 % of the admissible complaints processed. Although the “systemicity” of these issues has been repeatedly highlighted and analysed in the Authority’s Annual¹ and Special Reports, unfortunately it continues to consist the core of maladministration.

2. Geographical distribution and seasonality of reporting

The geographical distribution of the complaints handled by the Ombudsman in 2019 is the same as in recent years, as the impact of the problems of the financial crisis and the refugee crisis continues to spread outside the major urban centres (see Graph 3 and 3a).

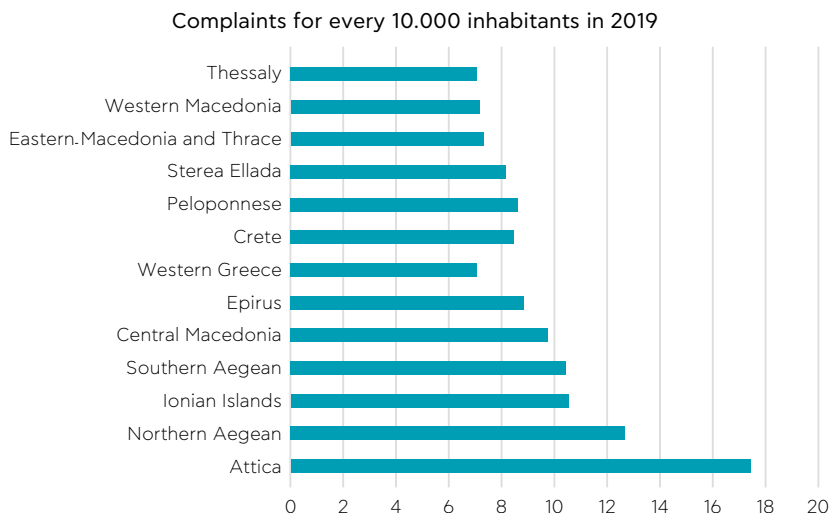
Graph 3

Geographical breakdown of complaints per Region in 2019



1. <https://www.synigoros.gr/?i=stp.en.reports>

Graph 3a

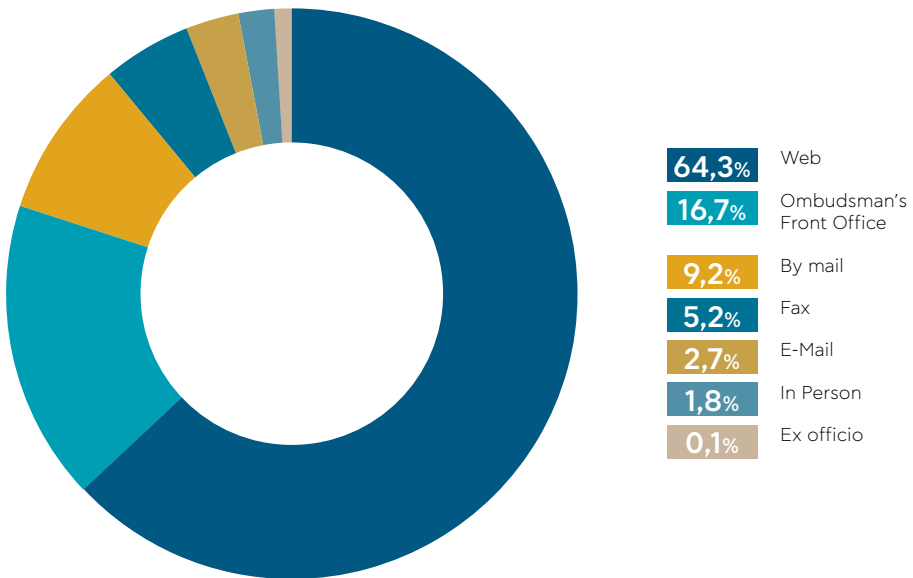


For yet another year the dominance of Attica and Central Macedonia remains unaffected. It is worth noting, however, that the complaints by residents of these two regions for the year show a significant increase of around 10 % compared with 2018.

The web and fax complaints are the majority and keep increasing; 72 % of the 2019 complaints were submitted in these ways. However, citizens keep coming to the offices of the Ombudsman for information on how to deal with their problems and ultimately for submitting complaints, which corresponds to about 19 % of the overall number (see Graph 4).

Graph 4

Breakdown of complaints based on the way they were filed in 2019



3. Website traffic – Social networks – Call Centre

Furthermore, in the context of the Ombudsman's digitised communication with citizens, the visits to the Ombudsman's website, as well as the response to posts on social media, are recorded below. Citizen support through the call centre is also recorded.

WWW.SYNIGOROS.GR (1/1/2019 - 31/12/2019)

TOTAL SINGLE VISITS

322.534 (+ 3.24 % compared to 2018)

WEB PAGE VIEWS

1.406.045 (-2.23 % compared with 2018)

SOURCES OF VISITS

Search engines [83,08 %]

Direct access [10.91 %]

Websites and references [3,37 %]

Social media [2.64 %]

ANALYSIS OF ACCESS TECHNOLOGIES (PC, smartphone, mobile)

PC access [61.89 %]

Smartphone access [33.80 %]

Tablet access [4.30 %]

SYNIGOROS-SOLIDARITY.GR (1/1/2019 - 31/12/2019)

TOTAL SINGLE VISITS

120.404 (+ 61.03 % compared to 2018)

WEB PAGE VIEWS

349.394 (+ 40.78 % compared to 2018)

SOURCES OF VISITS

Search engines [82,98 %]

Direct access [15.10 %]

Social media [1.29 %]

Websites and references [0,63 %]

TOP 10 MOST VISITED POSTS (in descending order)

1. Provision of free legal aid
2. Special benefit for families with three or more children
3. Vulnerable Groups
4. Benefit or pension increase due to disability
5. Severe disability benefit
6. Housing loans by the OEK (Workers' Housing Association)
7. Welfare benefits in cash for persons with disabilities are tax-free and cannot be confiscated
8. Disability certification
9. Long-term unemployment
10. Paraplegic benefit

ANALYSIS OF ACCESS TECHNOLOGIES (PC, smartphone, mobile)

Smartphone access [52.10 %]

PC access [41.42 %]

Tablet access [6.48 %]

SOCIAL MEDIA (1/1/2019 - 31/12/2019)

FACEBOOK (/SYNIGOROS)

Single users who have liked the official public profile/
members of the public profile
- at the end of 2019

19.707 (+ 7.87 % from the beginning of 2019)

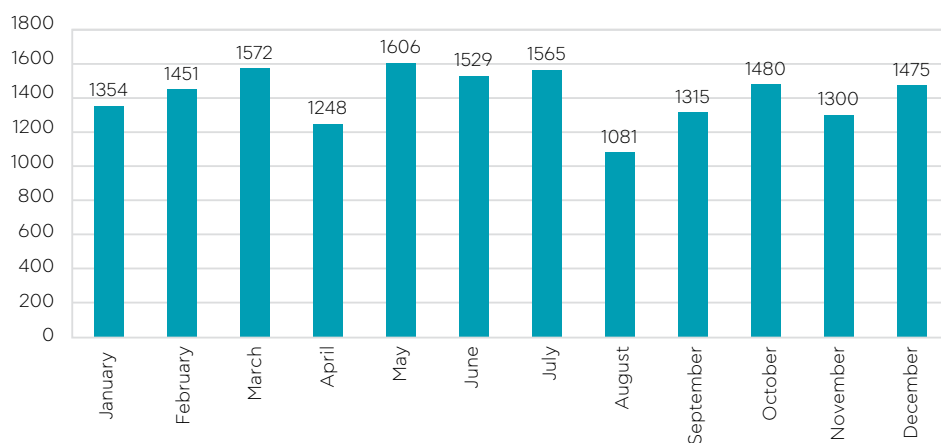
TWITTER (@SYNIGOROS)

Single users who have followed/followers of the public profile
of the Ombudsman-at the end of 2019

6.084 (+ 6.74 % from the beginning of 2019)

Graph 5

Breakdown of complaints per month in 2019



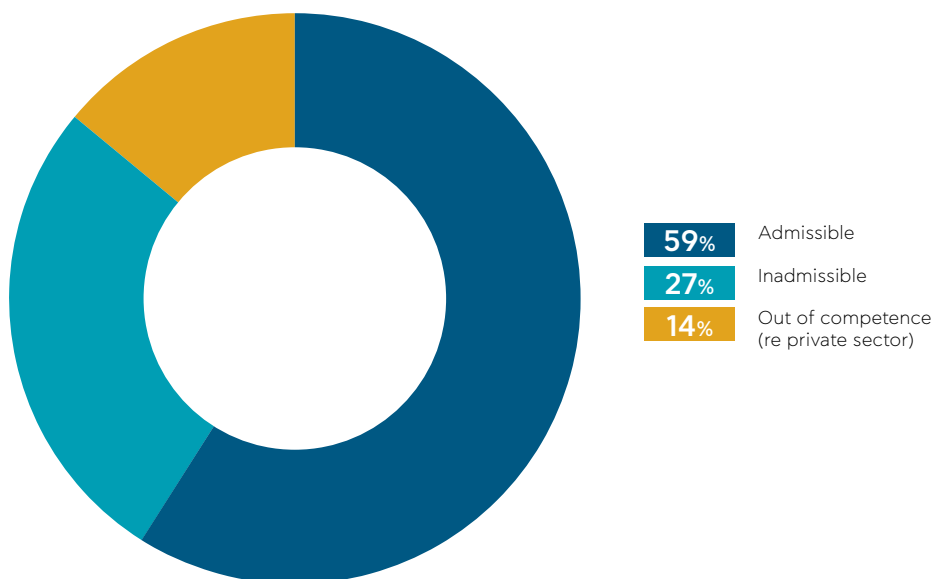
CALL CENTRE DATA		
2019	Calls received	Calls served
January	5120	2720
February	4805	2018
March	4780	2575
April	4163	2349
May	4796	2478
June	4202	2407
July	5289	2787
August	3936	2184
September	5292	2543
October	5489	2714
November	5019	2467
December	4552	2326

4. Inadmissible complaints and effectiveness of mediation

Graph 6 shows that for 2019 the percentage of complaints for which the Ombudsman's mediation was completed within the year, regardless of the date of submission, reached approximately 60 %.

Graph 6

Admissible and inadmissible complaints in 2019



The available data of the complaints finalised within 2019 record the efficiency of the Ombudsman's mediation over time, which continues to exhibit extremely high levels, with 73 % of the admissible complaints being positively resolved for the citizens (see Graph 7). On the other hand, the administration's failure to respond to the Ombudsman's proposals continues to be significant (about 8 %), while the inability to resolve a problem due to legislative gaps and organisational problems of the administration remains stable (8 %).

Graph 7

Outcome of admissible complaints



72,8%

Problem resolved following the Ombudsman's intervention

11,7%

Problem resolved without the Ombudsman's intervention

7,9%

Problem not resolved due to legislative failure or administrative malfunctions

7,6%

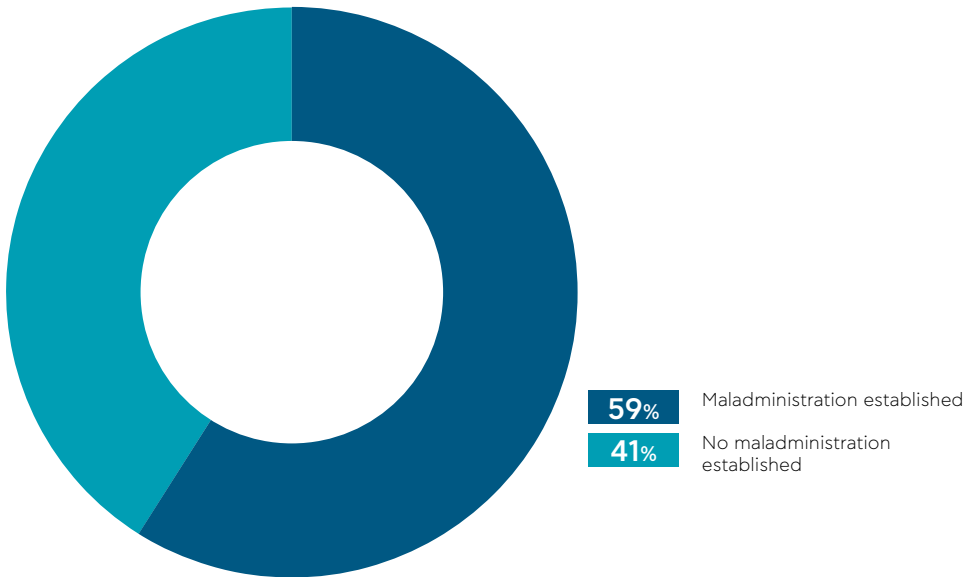
Problem not resolved due to the administration's reluctance to respond positively to the Ombudsman's recommendations.

5. The "x-ray" of maladministration

At the aggregate level, out of all the admissible complaints filed in 2019, there was a problem of maladministration in 60 % of cases (see Graph 8), which has been stable over the last few years.

Graph 8

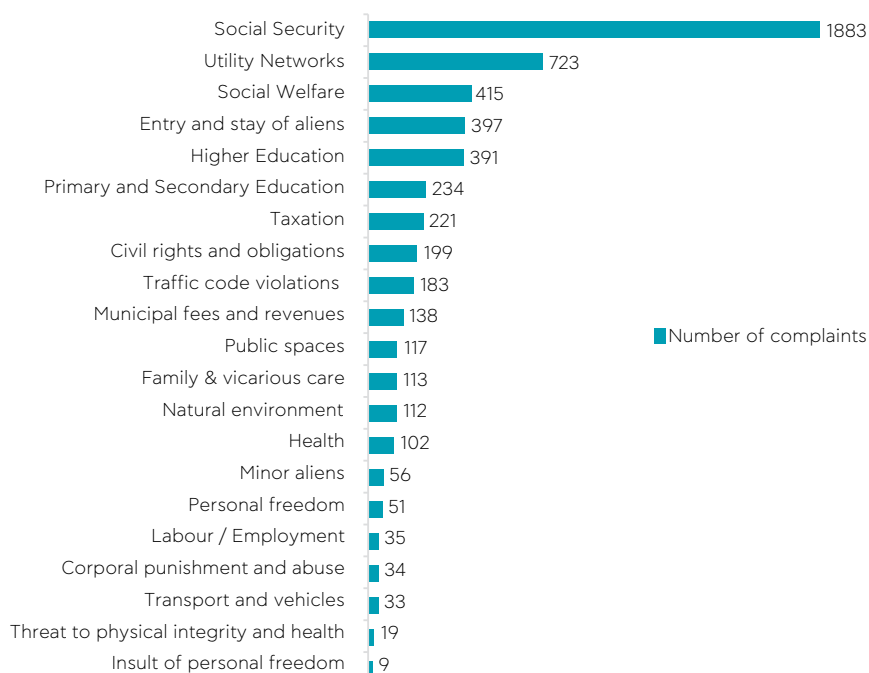
Admissible complaints and maladministration in 2019



Concentration of most cases of maladministration in welfare state, utilities, education (all levels), local government and the built and natural environment. A particularly important finding for 2019 is the significant number of complaints that deal with human rights and refugees (see Graph 9).

Graph 9

Admissible complaints in the main thematic categories

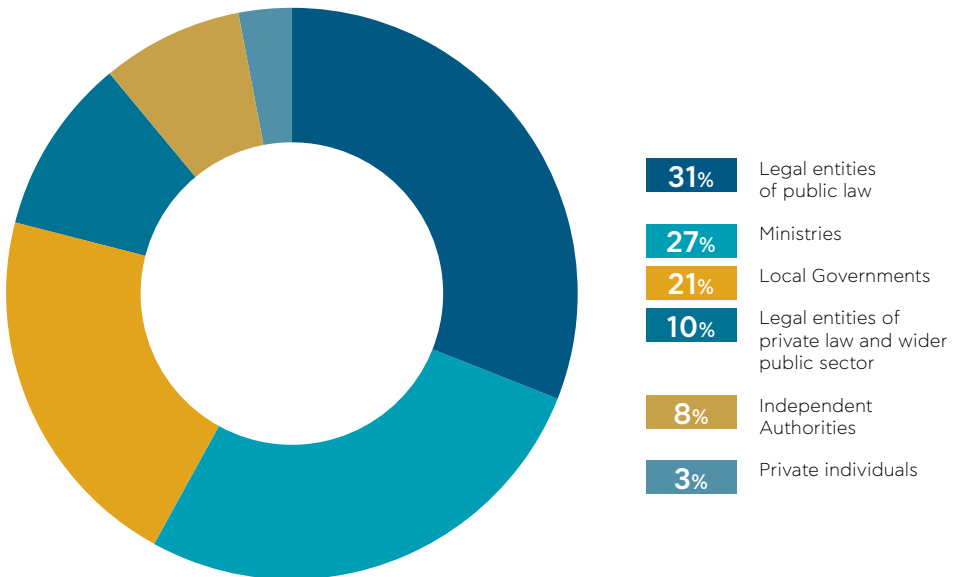


6. Government Agencies and maladministration

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

Graph 10

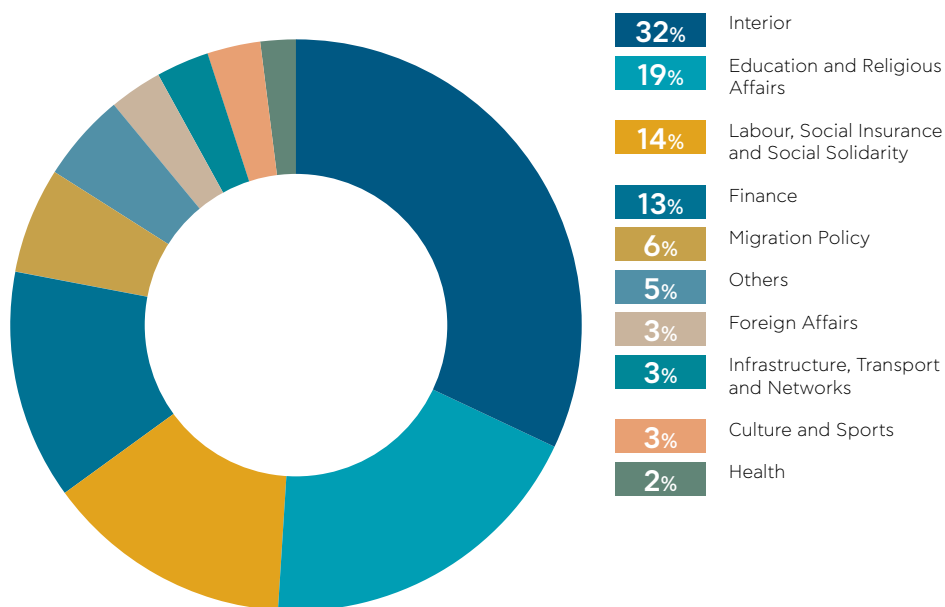
Admissible complaints per Government Agency

**a) Ministries**

Ministries accrue around 27 % of maladministration detected in complaints in 2019. In particular, the Ministry of Interior has the highest number of complaints where maladministration has been found. The Ministries of Education & Religious Affairs, Labour, Social Insurance and Social Solidarity, Finance, and Migration Policy follow (see Graph 11).

Graph 11

Admissible complaints per Ministry

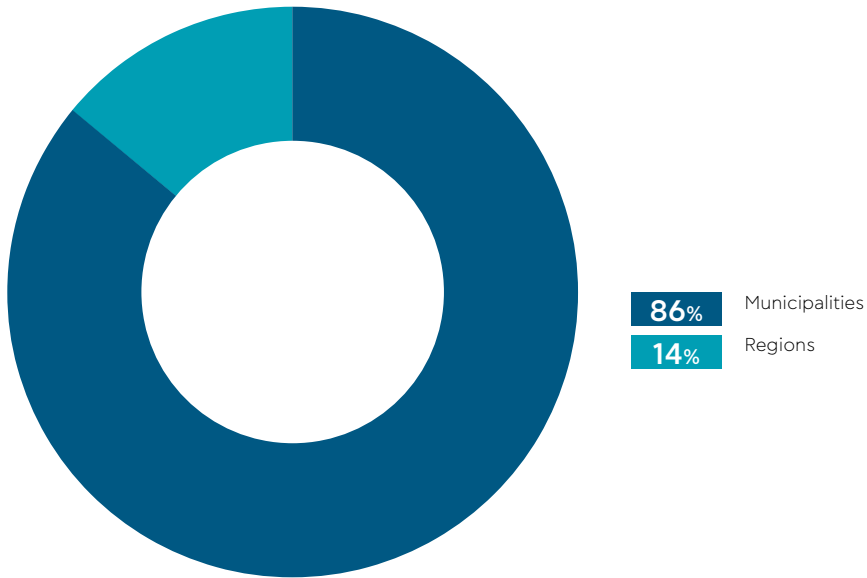


b) Local Authorities

Local authorities (Municipalities and Regions) accumulate around 21 % of maladministration detected in complaints finalised in 2019. The majority of cases of maladministration relate to municipalities (86 % of the admissible complaints) (see Graphs 12, 12a, 12b).

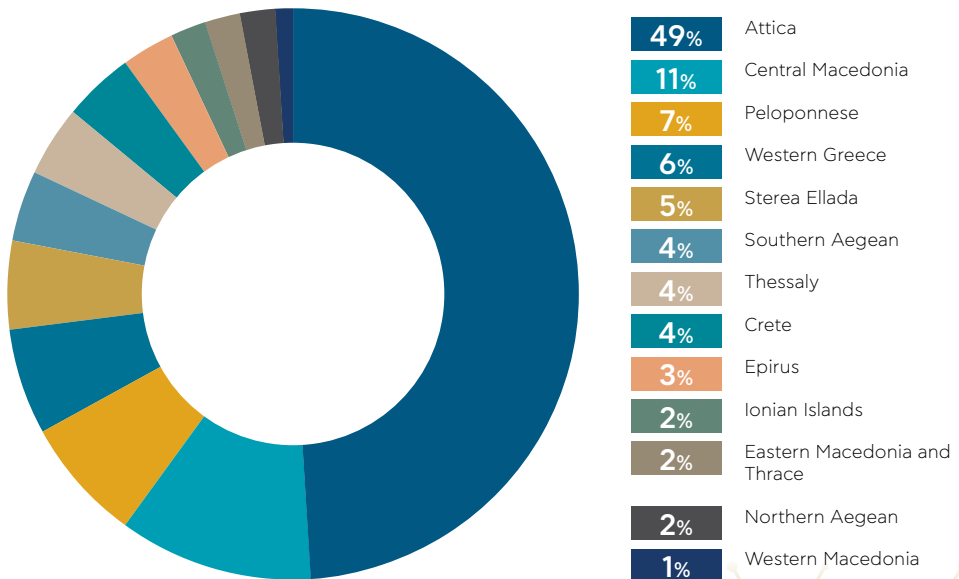
Graph 12

Admissible complaints associated with local authorities



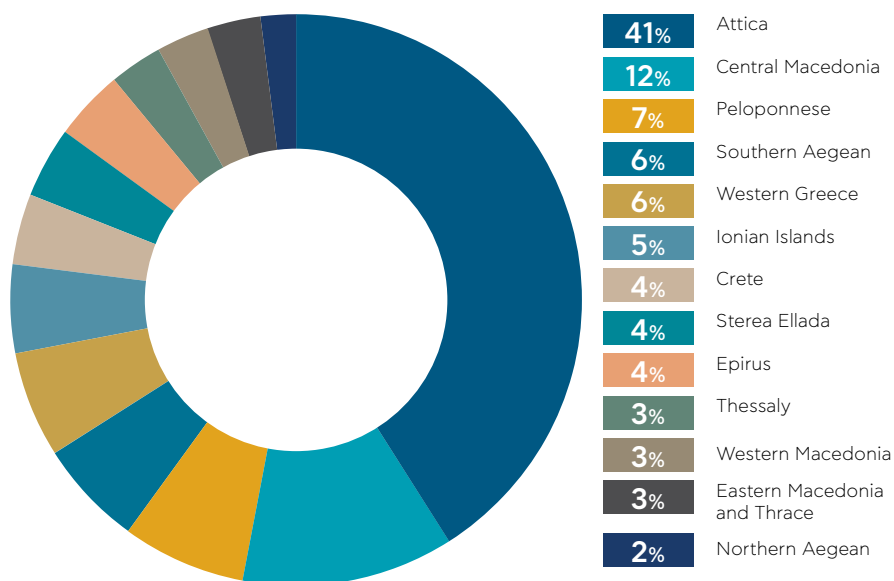
Graph 12a

Admissible complaints associated with municipalities per Region



Graph 12b

Admissible complaints associated with Regions



The geography of maladministration in the municipalities reflects, as expected, primarily the geographical concentration of the population in the major urban centres (Athens, Thessaloniki, Patras). The weaknesses of the “local state” continue to fuel the “localised exclusion” (real and symbolic) of the citizens that do not inhabit the major urban centres.

c) Legal entities of public law

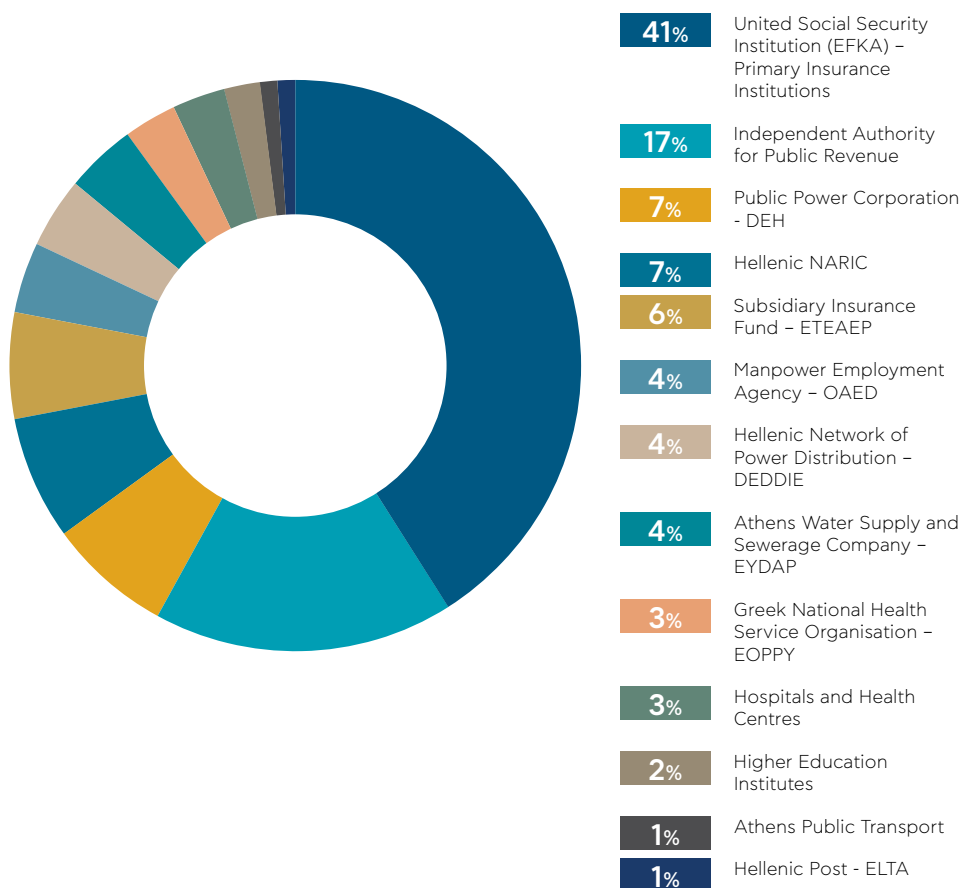
The bulk of complaints with established maladministration (30 %) is concentrated in legal entities of public law directly related to social security and welfare. An increasing trend in maladministration is also shown in the complains regarding taxation, as mentioned above, and this is reflected in the admissible complaints concerning the Independent Authority for Public Revenue (IAPR) (17 %) (see Graph 13).

Finally, serious forms of maladministration are found in energy, water and transport agencies (DEH-DEDDIE, EYDAP, public transport), and these problems have shown long-term stability with an increasing trend in recent years.

In addition, the percentage of admissible complaints with established maladministration in the services provided by Hellenic NARIC more than doubled (from 3 % to 7 %).

Graph 13

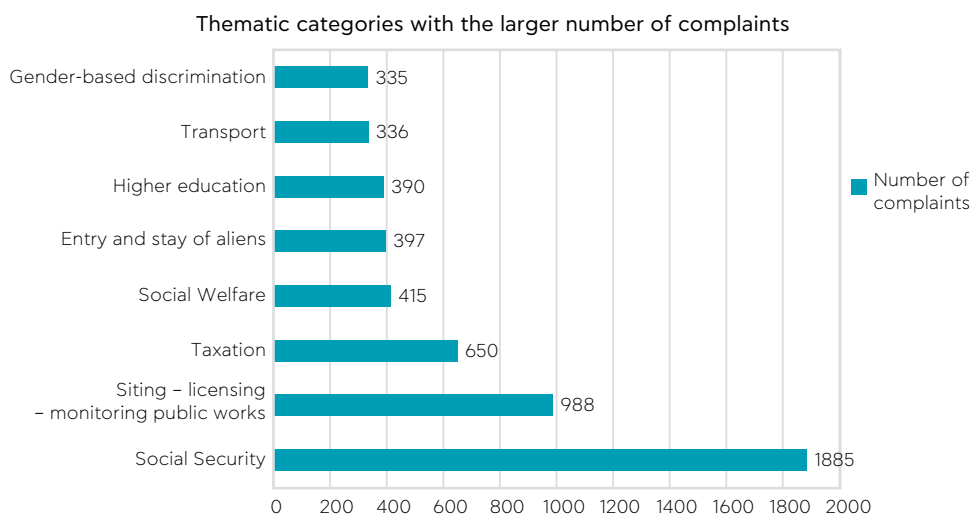
**Admissible complaints associated with legal entities of public law,
legal entities of private law, wider public sector & Independent Authorities.**



7. In conclusion

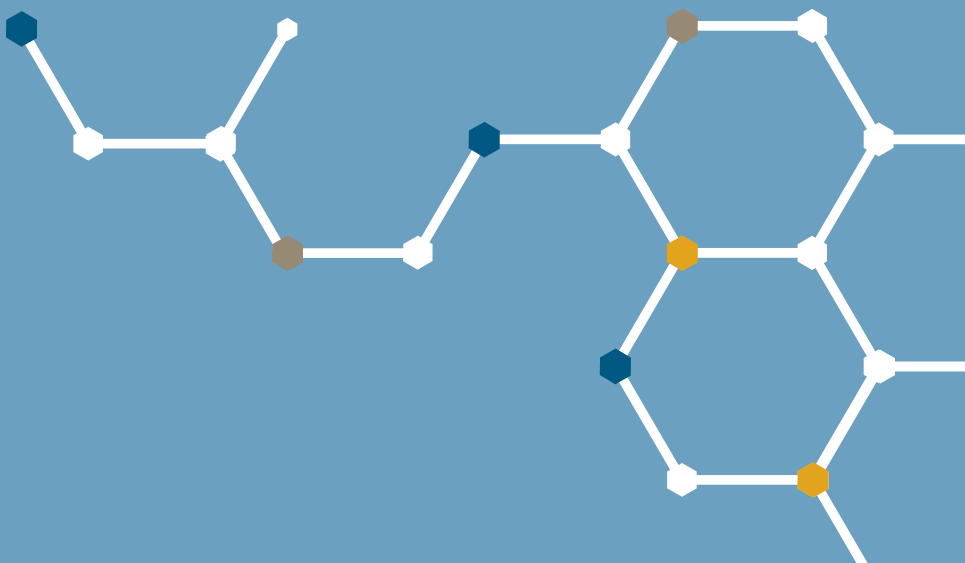
The continued significant increase of complaints lodged with the Greek Ombudsman as compared to the previous year, as well as to the last five years, reinforces important findings of the Ombudsman regarding the “systemicity” and serious pathogenicity in the management of the impact of the fiscal crisis despite the improvement of macroeconomic indicators. The attempt to reverse the serious negative effects of the crisis, which have largely marginalised vulnerable social groups and disadvantaged-isolated areas, should focus on strengthening the effectiveness and solidifying the possibilities for intervention of the Welfare State and the Rule of Law in the critical fields this Report lists.

Graph 14





THEMATIC DOSSIERS



THEMATIC DOSSIERS

It is important to acknowledge that in 2019, the update on the Ombudsman's work became even more comprehensive, timely and regular, through the posting of quarterly bulletins on our official website², which include the most important and representative interventions. This provides all interested parties with periodical access to all areas of the Ombudsman's activities.

The issues on which the Ombudsman has focused in 2019 are the following:

- INTERNATIONAL PROTECTION
- PROTECTION OF RIGHTS FOR CHILDREN AND MINORS
- LOCAL GOVERNMENT MALADMINISTRATION
- LABOUR MARKET AND EMPLOYMENT
- SOCIAL SOLIDARITY
- HEALTH & SOCIAL SECURITY
- IMMIGRATION
- LAND RECLAMATION AGENCIES-RURAL AREAS OF HIGH PRODUCTIVITY
- RECRUITMENT PROCEDURES
- HIGHER EDUCATION
- NATURAL DISASTERS
- NATURAL ENVIRONMENT – GEOTOPES

2. <https://www.synigoros.gr/?i=kdet.el.news.558869>

1. International Protection

The year 2019 was marked by the rise of mixed flows to the islands in the summer, which led to explosive numbers of migrants in Moria Lesvos and Samos. At the same time, in all 5 islands (Lesvos, Chios, Samos, Kos and Leros) where “hotspots” (Reception and Identification Centres – RIC) operate with a capacity three times larger than normal already in mid-August (18.000 versus 6,000 places) serious issues with regard to living conditions and shortages, especially in health workers, continued, as highlighted in the Ombudsman’s previous report³. The Ombudsman:

- Submitted in October 2019 a detailed opinion on the legislative initiative amending international protection regulations to the Ministry of Citizen Protection, responsible for immigration policy and the asylum, as well as to the Parliament.
- Proposed the amendment of the Joint Ministerial Decision (KYA) on the social security number (AMKA) procedure in order to comply with EU law and resolve the problems of access to employment, insurance and health care of asylum seekers. It also requested that asylum seekers, as well as minors (unaccompanied or not) have access to medical care.
- Especially for Children on the move, the Ombudsman, in cooperation with UNICEF, drew up a report, reflecting the most important problems and recommendations and asked the competent Ministries for the complete abolition of any form of detention.

1.1. Entry and legislative framework for asylum seekers

Three years later, the EU-Turkey Joint Declaration of 18.03.2016, seems to continue to affect the guarantees of international protection and also the refugee living conditions on the islands.

The main points identified by the Ombudsman concerned the need for fuller protection of the refugee family members and the unaccompanied minors, the problematic extension of asylum seekers’ detention in terms of conditions, areas and duration, issues of proportionality regarding penalties on applicants for non-cooperation, procedural guarantees regarding the interviewing body, the exercise and suspensory effect of

3. See Annual Report 2018, p. 60

the appeal as regards to judicial protection, etc⁴. The Ombudsman reiterated its view that the management of the refugee issue presupposes a coherent integration strategy.

1.2. Health

In 2019 the Ombudsman received complaints⁵ concerning the inaccessibility of applicants for international protection to public health structures. Asylum seekers and minors (accompanied or unaccompanied) were included in the beneficiaries of free care in accordance with article 33 of Law 4368/2016, however the provisions of the Alien Health Care Card (KYPA) were never activated.

At the same time, the conditions of the relevant KYA for the granting of AMKA were not met. After the withdrawal on 11.07.2019 by the Minister of Labour and Social Affairs of the relevant circular issued on 20.06.2019, the total refusal of Citizens Service Centres (KEP) to issue AMKA resulted in obstacles of access to both employment and insurance of the applicants for international protection and also in the complete lack of medical care for the relevant populations.

The Ombudsman, addressing the co-competent ministers, proposed the amendment of the Joint Ministerial Decision and also called for the immediate access of both asylum seekers and alien minors to medical care.

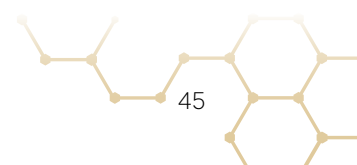
Article 55 of the new law on International Protection (Law 4636/2019, OJ A 169) finally provided for the issue of a Provisional Insurance and Health Care Number for Aliens (PAAYPE) a very important development for the health care gap that had been created. However, in practice, the gap in hospitalisation and medical care of asylum seekers continued to exist due to the failure to issue the KYA needed for the implementation of the law; it was finally issued on 31.01.2020.

1.3. Children on the Move

2019 was marked by the increase in the number of children refugees and migrants. The Ombudsman, continuing its activities with on-location inspections at the Reception and Identification Centres, the Detention and Hospitality Centres, as well as visits to facilities for unaccompanied

4. See Legislative and Organisational Proposals

5. For example, the vultures. 254979, 265669, 270812, 271533



children, in order to determine the level of service to them, identified particularly serious violations of the rights of children entering the territory, in particular:

- the number of children under protective custody in police stations and pre-removal detention centres keeps increasing
- highly heterogeneous and uneven practices have been observed when children's age is determined by the authorities
- lack of accommodation structures, given that more than 1600 children are in Reception and Identification Centres ("hotspots") and over 1200 are in conditions of homelessness or precarious living
- their access to the Asylum Service, where there are particular delays and other partial violations
- as to the violation of their right to education, due to the lack of Reception Facilities for Refugee Education (RFRE) and reception classes and the delay in operation of existing classes.

The Ombudsman included its main remarks in the report published on Children on the move, but also sent letters to the competent Ministries⁶ on the above issues, insisting in particular on the complete elimination of detention for children.

2. Protection of rights for children and minors

The year 2019 was marked by the increase in complaints in relation to violations of the rights of children, as well as the increase in requests for intervention by the children themselves. The Ombudsman took important actions in the field of education, on issues of support for children and vulnerable families in the community, as well as in matters of minors' health and, in particular, vaccinations.

In particular the Ombudsman:

- organised networking activities with the Regional Centres for Educational Planning (PEKES) and the Educational and Counselling Support Centres (KESY), as well as training seminars/workshops for school heads in primary and secondary education
- officially requested from the Ministry of Education to address issues

6. <https://www.synigoros.gr/?i=childrens-rights.en.recentinterventions.583469>

of adaptation and integration in the classroom of children at risk of social exclusion

- addressed the Ministry of Labour, Social Security & Social Solidarity on the issue of supporting vulnerable families and alternative care of children living away from their families, as well as children living under institutional care
- made observations and recommendations on the issue of vaccination, asking for a circular that leaves no doubt as to the obligation of vaccination as a precondition for the enrolment in schools.

2.1. Educational Issues

The year 2019 was also marked by the increase in support requests from schools called upon to deal with various problems in everyday school life. In particular, difficulties in including in the school community children facing increased challenges together with heterogeneous or hasty practices in the pedagogical and administrative attitudes of directors and teachers have in many cases led to tensions between parents and children on the one hand and educational staff on the other.

2.2. Support for children and vulnerable families in the community

The Ombudsman sent to the Deputy Minister of Labour, Social Security & Social Solidarity and to the Secretary-General of Welfare, a findings report regarding the support of vulnerable families and the alternative care of children living outside the family environment for any reason (unaccompanied refugee-immigrant children, children who are removed from the family and remain in hospitals for a long time while not in need of hospitalisation, until they are admitted to an institution or until other decisions are made regarding their custody) as well as children that live in an institution.

The Ombudsman underlined the need for the reorganisation of the child protection system in our country, taking into account the latest guidelines and the rights of children recognised internationally, in particular by pointing out:

- the lack of adequate support and monitoring of families with serious psychosocial problems in the community
- the serious failure of foster care (whether with relatives, a family and professional)

- the operation of many child protection institutions based on an obsolete model with severe deficits, inadequacies and anachronistic elements, along with the lack of an appropriate legislative framework for the transition from the institutions to the community
- the absence of a single legal framework and quality standards for the operation of child protection structures in the public and private sectors, adequate supervision and control mechanisms
- the prolonged stay of children in institutions, which significantly exceeds the European average
- the chronic institutionalisation, in particular, of children with disabilities and/or chronic illnesses
- the serious inadequacy of accommodation for unaccompanied minors and the consequent homelessness or prolonged stay of a large number of children in places completely unsuitable.

On the basis of the above, the Ombudsman points out the need to draw up a comprehensive plan to prevent and effectively address neglect and abuse as well as the institutionalisation of children.

2.3. Health – Vaccinations

The Ombudsman was particularly concerned with the problematic wording of the vaccination requirement for the enrolment of pupils in schools.

In particular, the circular of the Ministry of Education, which seems to let the parents decide whether to vaccinate their children, created particular concerns and serious problems in the functioning of schools, whose directors did not know how to interpret the ambiguous wording.

Furthermore, the epidemic outbreak of measles in Greece, at an increasing rate of spread of the disease, forced the intervention of the Ombudsman.

The Ombudsman sent to the new leadership of the Ministry of Education its remarks and recommendations on the subject, insisting in particular on the immediate withdrawal of the circular of the Ministry of Education and its replacement by another, which will not leave doubt as to the obligatory implementation of vaccines as a condition for the enrolment of pupils in schools.

3. Local Government Maladministration

Typical issues that emerged during the year were:

- The practices of discrimination followed by municipalities between citizens and non-citizens/permanent residents, both with regard to the imposition of various fees and the differentiated providing of municipal services and privileges.
- The application of the extrajudicial settlement procedure for the compensation of damages, in cases of objective liability of the municipalities.
- The insistence of municipalities to misinterpret provisions concerning the exemption of non-electrified and unused real estate properties from municipal taxes, often despite clarifications provided by the Ministry of Interior.

3.1. Practices of discrimination when setting fees and offering access to privileges and free municipal services

The Ombudsman has repeatedly highlighted the issue of different treatment, by municipalities, of citizens registered in their municipal rolls compared to non-citizens or permanent residents and expressed the view that the provision of specific services exclusively to registered citizens, if it does not have a legal basis and is not justified, introduces an unacceptable criterion of discrimination between citizens who are in similar circumstances and violates the principle of equality.

Given that each municipality is composed of and relies on various categories of inhabitants, citizens as well as permanent residents and professionals operating within its boundaries, access to its benefits and services must be characterised by a corresponding wideness and reciprocity.

3.2. Extrajudicial settlement

The Ombudsman, from the second year of its operation, has been receiving complaints requesting compensation for damages due to omissions of local authorities to maintain the quality of their road network, resulting in the occurrence of damaging events for which they have objective responsibility.⁷

7. Articles 105-106 of the Introductory Law of the Civil Code

In a special report drafted⁸, the Ombudsman proposed a system of out-of-court dispute resolution by linking two legal bases: the provisions of articles 105-106 of the EisNAK (Civil Code Introductory Law) on the objective liability of local authorities/municipalities and the possibility of extrajudicial settlement provided by the Codes of Local Government.

Today, the possibility of satisfying the wronged in the manner described in the Special Report has been established in the citizens' conscience, local authorities and the legal world.

15 years since the drafting of the special report, the evaluation of the Ombudsman's intervention as a mediation institution, is considered positive.

3.3. Issues related to the application of laws 4555/2018 & 4604/2019 for unused and non-electrified real estate

Article 103 of law 4604/2019, which replaced paragraph 2 of article 222 of law 4555/18, extended the deadline of submission of the solemn declaration for the exemption of non-electrified properties from cleaning and lighting taxes. The same provision provided for the write-off of debts from municipal fees of never-electrified and unused properties, as requested by the Ombudsman. However, some issues remained unregulated and others were not foreseen.

A. The issue of unused real estate, **whose electricity supply had been cut off due to unpaid electricity bills, remained outside the legislative provision⁹.**

B. During the application of the above provisions, there were cases where, when the interested parties came to the municipalities to submit the declarations required for their exemption from municipal charges, a discrepancy was found in the size of the real estate in sq.m. compared with the ones initially declared¹⁰.

The Ombudsman pointed out that **the legislator's intention was to subject to the beneficial provisions all outstanding matters relating to mu-**

8. "Civil Liability of Local Government Organisations. The case of damages to vehicles caused by road defects or other similar causes", (November 2004) <https://www.synigoros.gr/?i=state-citizen-relations.el.kakotexnies.26263>

9. FY 150151, 253052

10. FY 251064, 252000

municipal fees, including those which arose subsequently, provided they were declared within the timeframe laid down by the law. Despite the fact that the Ministry of the Interior supported the Ombudsman's opinion, there were cases of municipalities that persisted in the erroneous practice.

4. Labour Market and Employment

The effectiveness of proactive employment policies is limited due to complex procedures and bureaucratic issues, while in the workplace itself there are issues of unequal treatment due to serious deficiencies and gaps in legislation which lead to the loss of workers' rights with implications for their work and family life.

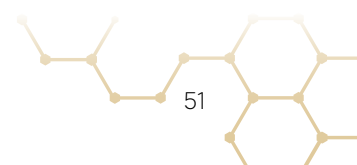
- The Ombudsman was particularly concerned with the issue of rejection of unemployed individuals who had succeeded in entering Manpower Employment Organisation's (OAED) public benefit programmes because they were subsequently found to have attended training and education programmes during their period of unemployment.
- With a view to the transposition of Directive 2019/1158 of the European Parliament and of the Council on work-life balance for parents and carers, the Ombudsman has formulated concrete proposals for arrangements which will help remove inequalities and improve the quality of workers' professional and family life.

4.1. Access to Employment – Proactive Employment Policies

4.1.1. OAED: Weakness in the procedures of properly informing the unemployed of their legitimate obligations

Organised, continuous and intensive information would help to protect vulnerable groups of the population from the risk of losing vital rights due to legislative changes which, objectively, not everyone and always is in a position to monitor.

OAED pledged to examine the conclusions and suggestions of the Ombudsman, to identify malfunctions in the system of keeping the unemployed informed and to review procedures that might need improvement.



4.2. Unequal treatment at the workplace – Proposals for work-life balance of workers

As a body monitoring and promoting the application of the principle of equal opportunities and equal treatment for men and women¹¹, the Ombudsman received a large number of complaints from fixed-term workers in the wider public sector¹², complaining about the great inequalities that exist vis-à-vis their colleagues, civil servants and private employees, concerning the status of maternity leave.

The problem highlighted by the significantly increased number of complaints over the last two years **concerns, in particular, women employed in the wider public sector under a fixed-term private-law employment contract, who are entitled neither to the 9-month child-care leave for permanent civil servants (even though they have exactly the same duties as permanent civil servants), nor to the specific (6-month) leave of maternity protection granted to workers in the private sector, since they are not employed in the private sector.**

The Ombudsman addressed the General Secretariat for Gender Equality of the Ministry of Labour, pointing out the adoption of Directive 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance for parents and carers, which our country is required to transpose into national law by 02.08.2022. The preamble to the Directive provides that: *‘Work-life balance policies should contribute to the achievement of gender equality by promoting the participation of women in the labour market, the equal sharing of caring responsibilities between men and women, and the closing of the gender gaps in earnings and pay. Such policies should take into account demographic changes including the effects of an ageing population.’* In this context, the Directive contains specific provisions for employee facilitation (parental leave, flexible forms of work, coverage of insurance contributions during the period of parental leave, etc.).

The balance between work and private life remains a serious challenge for working parents, especially those with increased care responsibilities (minor children, children with disabilities, senior parents or relatives with disabilities, etc.). In practice, this responsibility lies mainly on working women, which has a negative impact on their type of employment (part-time, fixed-term contracts) and their representation on the labour

11. Law 3896/2010

12. FY 258274, 258244, 258277, 262776

market (under-representation) and on the difficulty of balancing their occupational and family obligations.

The Ombudsman considers that the provisions of the Directive will contribute positively to the inequality in policies and measures that ensure work-life balance away from stereotypes. At the same time, it formulated the following concrete proposals, with a view to addressing work-life balance inequalities immediately and effectively:

- a) establishment of a 6-month parental leave for persons employed in the public sector under private law employment contracts not entitled to the 9-month parental leave in accordance with the Civil Service Code
- b) immediate priority to extend the specific 6-month leave of maternity protection to specific categories of workers.

5. Social Solidarity

By Law 4520/2018, the newly established Organisation of Welfare Benefits and Social Solidarity (OPEKA) is now responsible for the management and granting of welfare benefits, allowances, financial aid and social services, for the financial support and social integration of families and vulnerable groups of the population. However, during the transition to the new system, technical and procedural issues arose which led to delays and inconvenience of beneficiaries, including the risk of loss of benefits.

The Ombudsman dealt in particular with a number of problems encountered in the granting of:

- the housing benefit, which was resolved, thanks to the Ombudsman's intervention, through the modification of the relevant electronic platform
- the housing assistance benefit for uninsured elderly persons
- the social solidarity benefit for the uninsured elderly.

5.1. Problems related to welfare benefits

5.1.1. Housing benefit

In relation to the new housing benefit¹³ for main residence lessees, a number of complaints revealed a problem with regard to calculating the income of those entitled to the benefit.

Through the cooperation of the relevant government bodies, the electronic platform of the application for the benefit was modified¹⁴ and the relevant instructions were given to the competent municipal services in order to fill the welfare benefit amounts in a specific box so that they would not be taken into consideration for the purpose of granting the housing benefit.¹⁵

5.1.2. Housing aid for uninsured elderly

A structural problem of OPEKA delaying the examination of the relevant applications for many months was identified in relation to the housing aid for uninsured elderly people.¹⁶ The Ombudsman asked the Ministry of Labour and Social Affairs to publish the Benefits and Services Regulation of OPEKA as soon as possible.

5.1.3. Social solidarity benefit for uninsured elderly

Citizens who have applied to OPEKA for social solidarity benefit for uninsured elderly people face a very important problem and their applications have been pending for a long time, which often exceeds eighteen or even twenty-four months. From the investigation of the complaints to date, it appears that the departments of OPEKA do not follow the instructions of the relevant circulars, so that the procedure for granting the benefit remains pending and those who meet the above criteria remain without any form of social protection.¹⁷

13. Article 3 Law 4472/2017 and JMD no.D.13c.10747/256/2019 (FEK B 792)

14. <https://www.asynigoros.gr/?i=health-and-social-welfare.el.kpnews.566236>

15. FY 258481, 258934, 260397

16. JMD C3/ik.2615/22-5-1985 (FEK B 329/1985), Ministerial Decree C3/ik.2435/8-7-1987 (FEK B 435/1987), article 4 of Law 4520/2018

17. FY 265740, 267602, 265334

6. Health and Social Security

The Ombudsman, having an overall picture of the problems arising after reforms in the social security area, is able to identify malfunctions and distortions and propose solutions.

In this context, the Ombudsman:

- reiterated the issue of illegal extra charges to individuals insured with the National Organisation for Health Care Services Provision (EOPYY) who were hospitalised in private hospitals
- highlighted issues that arose after the creation and launch of Unified Social Security Fund (EFKA), such as the need to operate an effective computerised system, as well as the obligation to update pensioners and provide access to information related to their pension.

6.1. Problems in relation to the charges imposed by private hospitals to persons insured by the EOPYY

Over time, the Ombudsman has repeatedly considered the issue of charges from private hospitals for the provision of services to persons insured in the public social security system, from different aspects.

The repeated imposition of additional illegal charges to insured persons by contracted private health providers, led to the addition of article 61 to the current EOPY (Single Regulation for Health Services Supply)¹⁸, according to which, the beneficiaries, during their hospitalisation in all types of private health care structures, are not obliged to any additional financial burden beyond those provided for in the Regulation and in the contract of providers with the EOPYY, except if they themselves request upgrading of the services in writing. Furthermore, it is foreseen that the upgrading of hospital accommodation is not accompanied by a different pricing of the patient's lab tests.

6.2. Social insurance issues since the implementation of Law 4387/2016

Law 4387/2016 attempted to fully reform the Social Security system, within the framework of a Single Social Security System.

18. FEK B 2315/2019

Main provisions of the new institutional framework were the unification of all previous Social Insurance agencies and their integration into a single national body, EFKA, as well as the introduction of uniform rules for all insured persons and pensioners.

With the creation of the Unified Social Security Fund (EFKA), and the introduction of uniform rules for the regulation of social security issues, the attempt was made to address the problems arising from the fragmentation of pension and insurance regulations, the pluralism and inequality of benefits. The Ombudsman in its Annual report highlighted:

- the need to design and implement a computerised system in EFKA for individual insurance requests
- issuance of administrative acts recalculating pensions in accordance with the provisions of Law 4387/2016 – Non-posting information notes on the website of EFKA.

7. Immigration

The Ombudsman, having the remit to protect rights, in particular those of vulnerable groups, continues to deal systematically with the issues of immigration policies, monitoring current legislative developments in the field, formulating – where necessary – proposals for their improvement and exercising control over how the existing immigration legislation is implemented by the competent authorities. Especially with regard to the problem of long delays in the process of granting and renewing residence permits, which is still unresolved, the Ombudsman remains constantly in contact with the Administration, proposing specific ways to deal with and improve the time for processing applications.

7.1. Delays in the procedure for granting/renewing residence permits

Excessive **delays** observed in the **examination** of all categories of residence permits, whether they involve initial granting or renewal of a prior permit, both by the competent departments of the Department of Migration Policy of the Ministry of Citizen Protection¹⁹, and by the majority

19. Former Ministry of Migration Policy

of Directorates of Aliens and Immigration (DAM) of the country's decentralised administrations, remain, for yet another year, the main issue of a large number of complaints to the Ombudsman.

In particular, with regard to the category of residence permits for **exceptional reasons**, the delay is not only found in the long duration of the examination of the request on the merits, but mainly in the long wait for lodging the request, since **the determination of the date of submission of a request** to the competent authorities (especially in Attica) surpasses one year from the manifestation of the relative will of the interested parties.

The Ombudsman, as the recipient of numerous relevant complaints from third-country nationals and within the framework of its remit, continued the open dialogue with the Administration on **how to deal** with these malfunctions, recalling its standing recommendations for adequate staffing of the services, relocating them, where necessary, to more appropriate infrastructures, providing additional logistical means, the possibility of electronically setting a date for submission of applications for exceptional reasons and for additional documents. These proposals will clearly bring about, as also perceived by the relevant officials, simplification and acceleration of the relevant procedures.

In this direction, **a pilot system for automated appointments was activated in the DAI of the South Sector, Piraeus and Islands via an electronic platform**, which however presented problems in its implementation and efforts are being made to improve it. Moreover, in October 2019, **recruitment procedures for fixed-term contract employees were completed**, initially for an eight-month period, with the possibility of renewal, which we believe will help speed up the relevant procedures. According to an assessment by the Foreign Affairs Directorate of the Ministry, following the above-mentioned capacity increase, pending requests for residence permits for exceptional reasons, which had been submitted until entry into force of Ministerial Decision 58114/2016²⁰, are expected to be examined by the beginning of 2020. In the same context for the decongestion of the Directorates of Aliens and Immigration (DAI) in the large urban centres of the country, **M.D. 9907/2019/19**²¹ was issued, which gives the possibility to submit a request for an investor permanent residence per-

20. 'Redetermination of competent authorities issuing residence permits granted in accordance with the provisions of article 19 of Law 4251/2014, as in force' (FEK B 4471) with effect from 03.04.2017

21. FEK B 1106

mit of article 20 (b) Law 4251/2014, with any one stop service of the DAI of the decentralised administrations of the country and not necessarily the one to which the property to be acquired belongs.

The Ombudsman understands the serious problems of delays mainly due to insufficient staffing of the competent services, combined with the increased volume of requests for the granting/renewal of residence permits, it also recognises the efforts made by their officers towards a faster and simplified examination process, but considers that the objective of smooth management and elimination of maladministration in this field has not yet been achieved.²²

8. Land Reclamation Agencies-Rural areas of high productivity

Over time, the Ombudsman has examined citizens' complaints about land reclamation agencies and rural land of high productivity.²³ It noted the wideness and fragmentation of both the existing legal framework and the competent authorities and supervisory and management bodies.

Key problems in the adequate functioning of Land Reclamation Agencies (OEB) and causes of tension with citizens are:

- the unclear and obsolete provisions in force since 1943
- the different legal forms of management bodies
- overlapping responsibilities
- the lack of good administration practices
- the absence of a supervisory authority
- the understaffing
- limited financial resources
- disparities in pricing policies
- incomplete harmonisation with environmental law and
- deficiencies in digitisation of management bodies' areas of responsibility.

22. For example, FY 266368, 269659, 268641, 266573

23. FY 259901, 263483, 253273, 263033

9. Recruitment Procedures

During 2019, the Ombudsman investigated recruitment issues in the public and private sectors with its general competence and its specific competence as a body to monitor and promote the application of the principle of equal opportunities and equal treatment in access to employment.

In this context:

- It evaluated the system of appointment and recruitment of permanent and substitute teachers in general and special education units in primary and secondary education and proposed a series of improvement measures to the Ministry of Education.
- It investigated the issue of age limit for public and private posts and examined whether or not it meets the legal conditions allowing for deviations from the principle of equal treatment.

9.1. Teachers' recruitment

In its report to the Minister of Education²⁴, the Ombudsman analysed the situation in the sensitive area of teachers' recruitment, especially after the relevant decisions of the Council of State, asked for the implementation of Law 3848/2010, which remained unenforceable for many years and proposed a number of improvements, including the following:

- To accept foreign degrees recognised by the Professional Qualifications Recognition Council (SAEP).
- In the case of recruitment for Special Education and Training structures, only professional experience in Special Education to be taken into account or professional experience in Special Education to be counted as specialised experience.
- Acknowledge the four hundred (400) hours training in Special Education if it has been offered by a University or a public body supervised by the Ministry of Education, without defining the period within which the training took place.
- Make the evaluation tables dynamic, i.e. constantly absorbing new information and allowing for subsequent adjustment regarding the professionals already recorded in them, as well as allowing new applicants to be introduced to them. Appointments and recruitment

24. FY 228372/33009/25.7.2017

should be made from the tables in force at the specific recruitment moment.

- Allow candidates to file the military status certificate and Greek language certificate at the time of appointment or recruitment and not on the date of application for the appointment/employment procedure.²⁵

9.2. Age limit for participation in recruitment procedures in the public and private sectors

The Ombudsman received numerous complaints from citizens²⁶ seeking employment in the private and public sectors, but found that they were excluded from a number of jobs, due to their age. The relevant notices contained maximum age limits for applying, ranging from the 28th year for some posts to the 30th year, the 35th year, the 40th year and the 45th year respectively.

Age is a protected ground in anti-discrimination legislation. The Council of the European Union, recognising that age is a sensitive issue in the labour market, particularly in conditions of uncertain or precarious economic environment, has included it in the grounds in which discrimination in the field of employment is prohibited. According to the preamble to Directive 2000/78/EC²⁷, prohibition of discrimination on the grounds of age is an essential element towards achieving the objectives set out in the Employment Guidelines and encouraging diversity in employment. Any deviations from the application of the principle of equal treatment, which are permissible under the regulatory framework of the Directive, must be applied strictly, as they introduce exceptions to the general rule of its respect.

Moreover, the scope of the Directive includes, in addition to active employment, access to it, as explicit reference is made to *'the selection criteria and terms of recruitment irrespective of the sector of activity and at all levels of the hierarchy, as well as the conditions of service and vocational training'*.

In view of the margin of discretion recognised to the Member States and the social partners, the promotion of recruitment of young people

25. FY 257641, 261211, 261094, 260770, 258186

26. Indicative FY 220773, 225783, 243683, 254188

27. Point 25

and the age balance of staff as a legitimate objective in recruitment cannot be excluded. However, such an approach should, in any case, be interpreted narrowly, since it constitutes an exception to the general principle of non-discrimination and should be adequately justified. Even if the objectives are deemed legitimate, the way and the specific actions to implement them should be in line with the principle of proportionality.²⁸ It is therefore necessary to balance the aim pursued and the measures chosen each time to achieve it.

10. Higher Education

A series of laws²⁹ adopted in the academic year 2018-2019, aimed at forming a Single Area of Higher Education, through closing down the Technological Educational Institutes (TEI) and integrating them into existing universities or, in some cases, establishing new universities. The structural changes in the country's academic map and the direct transition to the operation of the new departments and institutes, have had a multi-level impact on academic functions and processes.³⁰

The Ombudsman has recorded these consequences, and concluded that the process of implementing the so-called 'synergies' between TEI and Universities, without providing reasonable space for adequate planning and organisation of the transition to the new regime, took the area of higher education by surprise. The abolition of thirteen TEI and subsequent mergers in universities have brought consequences to a wide range of academic functions, which should be alleviated through appropriate measures.

11. Natural Disasters

The Ombudsman has received a significant number of complaints, especially in recent years, relating to inadequate shielding, prevention, man-

28. C144/2004 Mangold

29. Laws 4521/2018, 4559/2018, 4589/2019, 4610/2019

30. Indicatively FY 252214, 253569, 255433, 258475, 260980, 264517, 269010, 269155, 269163, 269238

agement & repair of damage occurring from natural disasters, as well as insufficient civil protection. The majority of complaints relate, on the one hand, to inadequate management (e.g. *insufficient institutional framework, overlapping or/and avoiding responsibility, failure to assume responsibility by the administration, restoration of damages, reinforcement of infrastructure*, compensation, etc.) and on the other hand to inadequate prevention (e.g. *urban planning, control of arbitrary constructing, management of water bodies*, understaffing of competent services, etc).

12. Natural Environment – Geotopes³¹

12.1. Geotopes

Greece occupies a particularly important position on the geological map of Europe, having extensive areas of important geotopes, which, among other things, comprise paleontological remains, rare geomorphological structures and thousands of caves. The Ombudsman, in the context of its long-standing mediation, has identified important issues relating to the institutional framework as well as the administrative response in cases of risk or destruction of the above environmental elements. As a whole, the Ombudsman's research demonstrates the lack of comprehensive understanding of the protected subject, but also of active interest by the administration. These positions have been expressed in writing repeatedly over the years to the competent Ministries, to the Parliament's Environmental Committee in 2017 and during its presence in the Working Group set up in 2018 on the initiative of the Ministry of Environment and Energy regarding the protection of geotopes which continued its work until 2019.

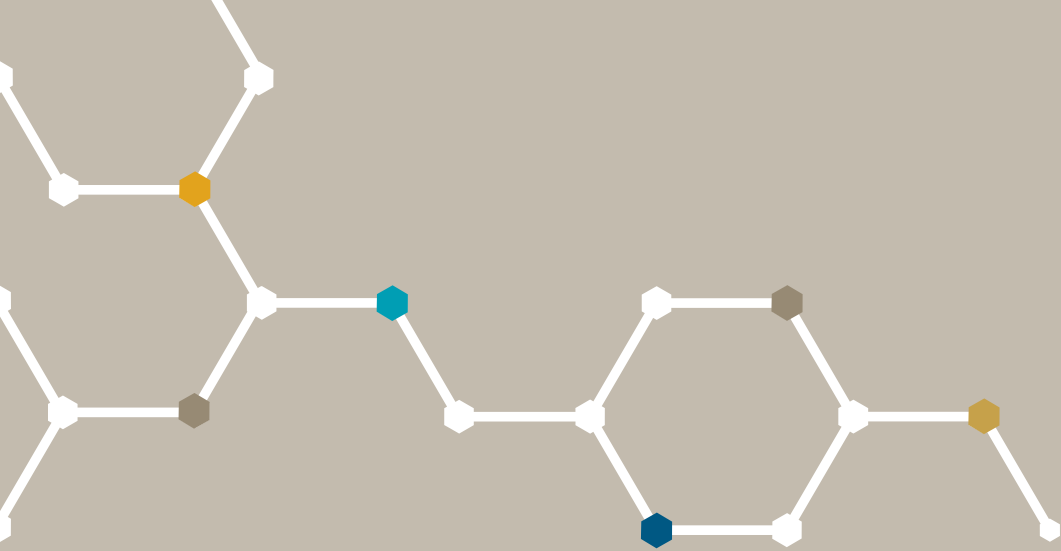
12.2. Protection of wetland of N. Propontis Chalkidiki³²

Following a complaint in 2017, the Ombudsman's mediation was requested for the protection of the "Sahara" wetland in the Municipality of Propontis, Chalkidiki. In the area there is a wetland officially recorded by the

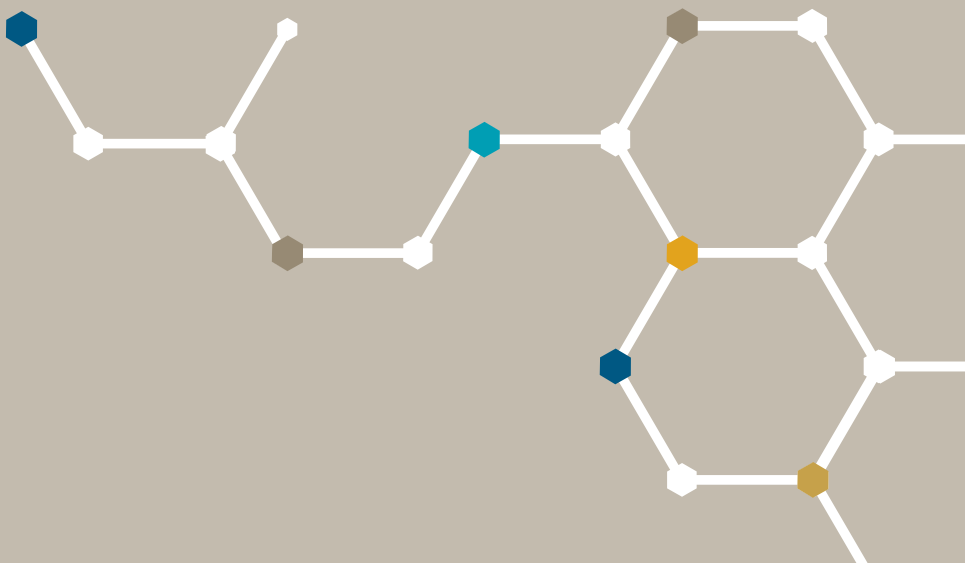
31. FY 265095, 265042, 229796

32. FY 230072

Greek Biotope/Wetland Centre (EKBY) which is a habitat of protected species of flora and fauna based on relevant studies carried out for the area. The Ombudsman, following an inquiry into the case, called for the competent services to be activated in order to ensure the protection of this wetland.



SPECIAL REMITS



SPECIAL REMITS

1. The Ombudsman as a framework for the promotion of the implementation of the UN convention on the rights of persons with disabilities (PWD)

1.1. Institutional framework

By article 72 of Law 4488/2017, the Ombudsman was defined as the Framework for the Promotion of the implementation of the UN Convention on PWD. In order to fulfil its mission, the Ombudsman is in collaboration with the National Confederation of PWD (ESAméA). The mission of the Promotion Framework is to monitor, promote and protect the implementation of the Convention and the public policies promoting the rights of PWD.

1.2. The first report by the Ombudsman on the implementation of the UN Convention on the Rights of PWD

In July 2019, the Ombudsman prepared its first report as a framework for the promotion of the implementation of the UN Convention on PWD and submitted it to the UN Committee on the Rights of PWD, which coincided with the first appearance of our country before the UN Committee, which took place in Geneva on 3 and 4 September 2019 and concerned compliance with the country's obligations under the Convention.

The report's aim is to highlight and address the obstacles and difficulties that arise in the full enjoyment of the rights of PWD, either because of the inadequacy of the legislative framework or through consolidated practices and behaviours.

The Ombudsman's observations refer to Articles 5,7,9,11,12,13,14,15,18,19,20, 21,22,24,25,27,28 and the full text of the Report is posted on the Ombudsman's website.³³

33. <https://www.synigoros.gr/?i=equality.el.nea.587484>

1.3. Co-operation of the Ombudsman with the Hellenic Parliament

On 23 October 2019 the Ombudsman Andreas Pottakis presented its Report to the Hellenic Parliament and specifically to the Subcommittee on the Issues of PWD of the Special Permanent Committee on Equality, Youth and Human Rights. The Ombudsman presented the main axes of the Report and then informed the Subcommittee of further interventions by the Ombudsman as well as of legislative developments that took place following its submission to the relevant United Nations Committee.

As pointed out by the Subcommittee, the presentation of the Report was considered particularly important, as it was decided that it would be used by all Ministries as a guide to the problems to be resolved, both due to content, its structure and codification. Following the presentation and discussion that followed, the Subcommittee asked the Ombudsman to forward its former and recent proposals for legislation, policies and measures that should be adopted by the Government with a view to substantially improving the living conditions of PWD, their active inclusion in the community and the enjoyment of all their rights, classified per Ministry, while it undertook to study the Ombudsman's proposals, assist in their implementation and remain in constant communication and co-operation with the Ombudsman.

1.4. Actions of the Ombudsman

The Ombudsman, using both general and specific duties in order to protect the rights of PWD and promote the implementation of the Convention, investigates complaints, conducts on-site inspections, proposes legislation, holds working meetings with competent bodies and seeks constructive cooperation with both the ESAMEA and the State Coordination Mechanism.

It is also important to mention that the Ombudsman has set up on its website a separate website for vulnerable groups³⁴ and has developed a Guide³⁵ aimed at contributing to the coverage of the existing information deficit and easier access to the critical information concerning vulnerable groups (rights, benefits, recent and older provisions in force,

34. <https://www.synigoros-solidarity.gr>

35. <https://www.synigoros-solidarity.gr/solidarity/assets/uploads/2016/02/odigos-dikaiwmatwn-paroxwn-gia-eyalotes-omades-2015.pdf>

competent services to which the citizen can resort, etc.). This website is regularly monitored and updated and includes a specific domain for PWD.

2. The Ombudsman as an equality body

In accordance with Law 3094/2003 as amended by Law 4443/2016, the Ombudsman is the country's designated Equality Body in both the public and private sectors³⁶. The Ombudsman's competence covers all grounds of discrimination (race, colour, national or ethnic origin, religion or other beliefs, disability or chronic illness, age, family or social status, sexual orientation, gender identity or gender characteristics) in the field of occupation and employment, while in the areas of taxation, education, provision of services and social protection, the Ombudsman may intervene only in the case of discrimination on the grounds of national or ethnic origin, colour or race and racial origin. Finally, with Law 4443/2016 it is also responsible for the implementation of the free movement of workers, pursuant to Directive 2014/54/EC.

2.1. Discrimination on the grounds of gender at work: Childcare leave for substitute teachers

The Ombudsman made a specific proposal for the establishment of maternity leave for substitute teachers. The Ombudsman's proposal was finally accepted by the Ministry and was included in article 26 of Law 4599/2019, while in the explanatory report of the bill special mention is made to the Ombudsman's proposal.

2.2. Discrimination on the grounds of gender identity: Issue of new form for the examination of a candidate driver following legal recognition of gender identity

The Ombudsman addressed³⁷ the relevant Directorate for Transport and Communications and pointed out that the correction of data or doc-

36. See chapters "Labour Market and Employment" p.51 and "Recruitment Procedures" p. 59

37. FY 257971

uments relating to legal recognition of gender identity should not be disclosed or made accessible to anyone, for reasons of protection of sensitive personal data but, above all, for reasons of respect for the individual's personality, therefore it asked the department to issue a new form for the examination of a candidate driver, request which was met with a fast positive response.

2.3. Discrimination on the grounds of disability: Fine to a hotel company for refusing to hire a PWD

The Ombudsman recommended to the competent Labour Inspectorate (SEPE) the imposition of the suitable sanctions³⁸ when it found that the prohibition of any form of discrimination on grounds of disability or chronic illness in the field of occupation and employment had been violated. The SEPE imposed a fine on the company and submitted a complaint to the relevant Public Prosecutor's Office.

2.4. Discrimination on the grounds of national or ethnic origin

In cooperation with the Ombudsman and the former Ministry of Migration Policy, the Bank of Greece responded positively by sending instructions to banks, according to which the identification of asylum seekers can be certified on the basis of the original International Protection Applicant Card.

2.5. Discrimination at work on the grounds of age: Removal of age limit in recruitment ads for large chain stores

In the field of private employment³⁹, the Ombudsman found that on the website of a large chain of coffee shops, all posted recruitment notices included a maximum and minimum age limit, between 20-35 years old, as a criterion for recruitment.

The Ombudsman informed the company that in accordance with the applicable legislation, this practice constituted a breach of the principle of equal treatment on grounds of age and requested a change in the

38. Law 4443/2016

39. FY 259702

company's recruitment policy and alignment with the existing legislative framework. The company fully complied with the Ombudsman's recommendations, completely eliminating age as a criterion.

3. The Ombudsman as a promoter of the rights of the child

3.1. Promotional Actions

2019 was marked by new initiatives and actions, as well as the increase in the demands for intervention by the children themselves. In particular, in 2019 the Ombudsman visited over 80 schools and participated in over 60 events covering the entire scope of the United Nations Convention on the Rights of the Child.

The Ombudsman participated in the annual meeting of the European Network of Ombudspersons for Children (ENOC).

Furthermore, in November 2019 the Ombudsman took part in a conference of the Council of Europe, attended by Ombudspersons and Civil Society representatives entitled "Redefining strength: Strengthening the Rights of the Child."

In addition, in October 2019, the Ombudsman participated in the annual meeting of the South East Europe Children's Rights Ombudspersons' Network, dedicated to Children on the move.

The Ombudsman received over 800 calls on the Child's telephone line (8001132000), and replied to over 50 letters from children sent through the special field of the Authority's website "I ask the Ombudsman".

In collaboration with UNICEF in March 2019, it launched two new tools for raising children's awareness and learning rights.

4. The Ombudsman as an external monitoring mechanism for returns of third country nationals

The continued funding of the action "System for the Monitoring and

Control of Forced Returns” from the European Asylum, Migration and Integration Fund 2014-2020 (AMIF) enabled the Ombudsman, in cooperation with the Office for the Implementation of European Programmes of the Hellenic Parliament, to continue the implementation of the actions through visits and site inspections, with relevant publications and information material as well as other supporting actions.

In 2019 Ombudsman participated in dozens of forced returns of aliens, i.e. land return operations in Albania, national and joint European air return operations in Georgia and Pakistan, sea and air readmission operations from Lesbos to Turkey, as well as site inspections at pre-removal detention centres (PROKEKA) and police stations where aliens destined for return are being administratively detained.

The Ombudsman, until November 2019, visited:

- 4 pre-removal detention centres in the areas of Moria Lesbos, Kos, Amygdaleza and Xanthi. 10 site inspections were carried out during the year at Moria PROKEKA
- the detention centres of the Thessaloniki Aliens Directorate (2 site inspections) and 4 Migration Management Departments (Thermi, Agios Athanasios, Kordelio) as well as other detention areas of police departments where aliens for return are detained
- and it participated with its investigators as observers, in the following return operations:
 - 7 National Return Operations (NROs) to Pakistan and Georgia; 2 Joint European Return Operations (JROs) under the coordination of FRONTEX to Pakistan and Georgia;
 - 11 readmissions, by sea or air, to Turkey and
 - 6 land return operations from Thessaloniki and Athens towards the Albanian border.

In brief, visits to PROKEKA and detention centres reveal shortcomings in the provision of medical, supportive and administrative services, as well as inappropriate accommodation facilities, while during the external control of returns/readmissions there are shortcomings in the provision of interpreting services, medical control, feeding, psychosocial support, pastime/recreation etc. as well as material means such as suitable transfer vehicles.

As positive points we record the limitation of the means of restraint during operations (but using Velcro handcuffs in ferry operations until boarding) and the implementation of the individualised judgments on

the necessity of the restraint. However, in all operations there is lack of timely information (at least 24 hours ago) while the constant lack of medical examinations, medical records and provision of fit to travel certificates entails the risk of fundamental rights of returnees being violated.

Alongside its action as an external monitoring mechanism, the Ombudsman took an initiative ('Nafplio Initiative') on human rights in European return operations for aliens, through the creation of an independent external monitoring mechanism for forced return operations of aliens at EU level, in cooperation with counterparts from independent authorities of other Member States and with the support of the Council of Europe. The Independent Authority has recorded its serious reservations, in particular as regards transparency and accountability deficits in the so-called European observers pool; the provided monitoring scheme essentially converts external monitoring, with guarantees of transparency and independence, into internal, since the European pool observers refer to FRONTEX. Therefore, the aim of the new independent mechanism is to defend fundamental rights and to ensure the transparency and legitimacy of these operations as well as the accountability of those involved in them.

The Ombudsman will continue to contribute through its proposals and networking with equivalent independent institutions in the wider field of European developments, in order to strengthen guarantees of independence in the system of external control of national and European returns and to consolidate the perception that independence is a necessary institutional guarantee of accountability for the effective protection of fundamental rights and the transparency of administrative action at borders.

5. The Ombudsman as a national mechanism for the investigation of arbitrary incidents (EMHDIPA)

Following a recommendation by the Commissioner for Human Rights of the Council of Europe for the creation of an independent and effective of mechanism of complaints, Law 4443/2016, art. 56-57 assigned to the Ombudsman the specific remit to function as an external investigation and control mechanism of arbitrary incidents, parallel to the Administration. This is a special investigative remit for specific cases of arbitrary in-

cidents by law enforcement and other uniformed State agencies: torture or other offences against human dignity provided for in Article 137a of the EC Treaty, illegal and culpable menaces to life, health, physical integrity, personal freedom, illicit use of firearms and behaviour with racist motives.

The first special report of EMHDIPA⁴⁰ represented the quantitative and qualitative responsibilities of the Mechanism from the entry into force of the provisions of Law 4443/2016, i.e. from the beginning of June 2017 until the end of 2018, accompanied by an analysis of responsibilities in specific cases and a statistical representation of cases. The Minister of Citizen Protection invited the Ombudsman to present the findings of the report to the Hellenic Police Staff. At the meeting held on 29.08.2019, issues related to the operation of the National Mechanism and the degree of response and compliance of the Hellenic Police with the observations and recommendations were discussed.

The second special report of the National Mechanism, which refers to the year 2019, examines the degree of response and compliance of the Hellenic Police, the Fire Department, the Coast Guard and the State Penitentiaries to the comments and recommendations of EMHDIPA. In addition, the subject of analysis is the statistics and findings of the Mechanism for the cases submitted to it in the year 2019, which amount to 208, mostly regarding Police investigations, as well as its findings on previous investigations. Also, the report refers to compliance with decisions of the ECtHR (European Court of Human Rights) for disciplinary investigations referred to EMHDIPA in 2019.

On 25.10.2018, the Ombudsman organised an event entitled: "Investigation of arbitrary incidents in the security forces: Upholding the Rule of Law Principles". Linos-Alexandros Sicilianos, President of the ECtHR, made the keynote speech at the event and the Ombudsman and the President of the Legal of the State participated. In his address, the Minister of Citizen Protection reiterated the State's willingness to cooperate and advance the proposals of EMHDIPA⁴¹.

40. https://www.synigoros.gr/resources/docs/emhdipa_2017_2018_gr.pdf

41. Indeed, a legislative initiative was taken and Law 4662/2010 (FEK 27 A) was issued, article 188 of which regulates relevant issues

6. The Ombudsman as a national preventive mechanism (NPM) against torture and other cruel, inhuman or degrading treatment or punishment

2019 was the sixth year the Ombudsman operated as the NPM according to Law 4228/2014, by which Greece ratified the Optional Protocol of the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT).

During 2019 the NPM continued its monitoring on conditions existing in various detention places (criminal, administrative, psychiatric, welfare), with regular visits and drawing material from complaints of detainees to the Ombudsman regarding their living conditions and respect of their rights. It also followed institutional developments in the field of the treatment of prisoners, while maintaining exploratory contacts with the competent Ministries and administrations of detention sites.

6.1. Institutional developments

At institutional level, worth noting were the transfer of anti-crime and immigration competences from the Ministry of Justice and the Ministry of Migration Policy (abolished in 2019) to the Ministry of Citizen Protection (PD 81/2019), the entry into force, as of 1.7.2019, of a new Penal Code and Code of Criminal Procedure⁴², as well as the re-amendment of the conditions for administrative detention of aliens⁴³.

6.2. Prisons

The acute staffing problem is added to the usual issues, such as over-population, inability to repair infrastructure and lack of opportunities for education, entertainment, employment and training, highlighted in the NPM's annual site inspections. The vacant posts of necessary staff leads either to a complete absence of vital functions, such as, but not limited

42. Laws 4619/2019, 4620/2019 and 4637/2019, cf. and relevant recommendations of the Authority in detail in the chapter of the Greek report "Observations of the Ombudsman on draft laws"

43. Law 4636/2019 with entry into force on 1.1.2020

to, social services at the Detention Facility of Kos, or to a very poor response to the needs of the detainees, such as, for example, in the case of the clinic at the Malandrino Detention Facility. The de facto sparse possibility of visits is also a common problem for all remote detention facilities.

6.3. Detention centres and pre-removal centres

The 2019 site inspections confirm the unchanging finding of the NPM that the already problematic conditions in police detention centres (such as impossibility of outdoors activities, insufficient guarding, limited capacity and inadequate cleanliness), are burdened to the maximum by the fact that they are also used for long-term administrative detention, a purpose incompatible with their destination and specifications.

6.4. Mental hospitals and closed-care institutions

In most psychiatric clinics, organisational and functional gaps cause serious difficulties in managing agitated patients. Closed-care institutions for persons with disabilities are burdened with fixed organisational and operational problems.

**LEGISLATIVE AND
ORGANISATIONAL
PROPOSALS – COMMENTS
ON DRAFT LAWS
– SPECIFIC REPORTS**

LEGISLATIVE AND ORGANISATIONAL PROPOSALS – COMMENTS ON DRAFT LAWS – SPECIFIC REPORTS

The Ombudsman consistently seeks to contribute to the improvement of legislation and administrative procedures in which it identifies problems and deficiencies in the exercise of its remits. Its Annual Report is an opportunity to codify and collect the legislative and organisational proposals to the competent Ministries and to record legislative developments, in cases where these proposals are accepted by the Administration.

In 2019, the Ombudsman made its remarks on the draft law on international protection and made general and specific observations on specific provisions in the process of reviewing the Penal Code and the Code of Criminal Procedure.

At the same time, it prepared four Special Reports, on the problems: State aid in the Agricultural Sector & Primary production, the implementation of the International Convention on the Rights of the Child, the Rights of Children on the Move and the Recognition of Foreign Academic Qualifications and Professional Rights.

1. Rights of Children on the Move⁴⁴

The Greek Ombudsman, within the framework of fulfilling its institutional mission to promote and protect children's rights, has been monitoring the situation of children on the move, with the purpose to intensify coordinated institutional intermediations and thereby strengthen their protection and contribute to the strategic planning.

Key findings

- Protection of children upon arrival and early reception stage
- Access to international protection
- Access to dignified and safe accommodation

44. https://www.synigoros.gr/resources/docs/annual_report_2018-rights_of_children_on_the_move.pdf

- Access to health care
- Access to education
- Key issues regarding unaccompanied children
- Recommendations.

2. State aid in the Agricultural Sector & Primary production⁴⁵

The first systematic mapping of the Independent Authority's long-term experience with regard to administrative malfunctions in the management of State aid for primary production in the agricultural, livestock breeding and fishing sectors. Impediments, distortions, bureaucratic problems and excessive delays in a number of procedures, in informing farmers of the penalties imposed, in their payments following acceptance of objections, in aid recovery procedures and in hearing fishery complaints have been recorded. In addition, the responsibility of agencies acting as intermediaries has been assessed, deficient inspections have been highlighted and errors in the digitisation of land parcels and the cartographic mapping have been identified. The special report contains fourteen specific proposals that should help to address both structural problems in particular in the area of aid, and the preparation of Greek farmers in the light of the new circumstances.

3. Recognition of Foreign Academic Qualifications & Professional Rights⁴⁶

The Ombudsman's Special Report on "Recognition of Foreign Academic Qualifications & Professional Rights: the institutional framework and the difficulties of accessing the labour market" puts forward, among other things, the complete reform of the framework of foreign qualifications recognition and the rationalisation of safeguarding the professional

45. <https://www.synigoros.gr/?i=stp.en.news.637042>

46. <https://www.synigoros.gr/resources/101019-pr-allodapoi-titloi-spoydon.pdf>

rights of thousands of graduates who asphyxiate — frequently for a number of years — among the red tape and the reasoning of professional interest groups.

4. Enrichment of the Legal Framework in 2019

The recognition of the Ombudsman as an independent, reliable and effective interlocutor of both the citizens and the State, led the latter to further endow the Independent Authority with three important institutional remits of substantial content. These arrangements enriched the scope of its participation in public life and in particular secured the participation of the Ombudsman, through its Equal Treatment Department in the National Gender Equality Mechanism⁴⁷, its participation in the Ethics Committee of the newly established National Transparency Authority⁴⁸ and the participation of a representative of the Authority as Rapporteur in the Special Interparty Committee of decisive competence, competent to examine objections against decisions rejecting registration in voting lists of voters outside the Hellenic territory⁴⁹.

47. Law 4604/2019 article 4 par. 2

48. Law 4622/2019 article 74 par. 2

49. Law 4648/2019 article 2 par. 6

ORGANISATION AND STAFF

The scientific and administrative staff of the Ombudsman at 31.12.2019 comprised 204 members, including the Ombudsman and six (6) Deputy Ombudsmen, of whom 53 men (25.98 %) and 151 (74.02 %) women. The scientific staff consists of 137 Senior Investigators and the administrative staff encompasses 62 executives.



Among the scientific staff 39 people (28.5 %) are PhD holders, 81 (59.1 %) Masters' graduates and 17 (12.4 %) University graduates. Of the administrative and secretarial staff 2 people (3.2 %) are PhD holders, 20 persons (32.2 %) hold postgraduate degrees, 13 (21.0 %) are graduates of higher education, 4 (6.4 %) graduates of TEI, 20 (32.2 %) have secondary education qualifications and 3 (4.8 %) are graduates of compulsory 9-year education.

The scientific fields cover a wide range of disciplines. These include: 86 lawyers, 14 political scientists, 5 philologists, 1 theologian, 10 economists, 11 sociologists, 8 archaeologists, 2 communication scientists, 1 architect, 5 psychologists, 3 geologists, 1 physicist, 1 chemist, 1 chemical engineer, 2 civil engineers, 2 educators, 1 statistician, 1 medical doctor, 2 topographer engineers, 6 IT scientists, 2 librarians, 1 archives manager, 7 graduates of business administration, 5 graduates of humanities, 1 graduate of health management, 1 translator and 2 journalists. Above you can find a photo of the Ombudsman's staff.

ABBREVIATIONS

- **AMIF:** European Asylum, Migration and Integration Fund
- **AMKA:** Social Security Number
- **AOM:** Association of Mediterranean Ombudsmen
- **DAM:** Directorates of Aliens and Immigration
- **DEDDIE:** Hellenic Electricity Distribution Network Operator
- **DEH:** Public Power Corporation
- **ECtHR:** European Court of Human Rights
- **EFKA:** Unified Social Security Fund
- **EisNAK:** Civil Code Introductory Law
- **EKBY:** Greek Biotope/Wetland Centre
- **EKPY:** Single Regulation for Health Services Supply
- **EMHDIPA:** National Mechanism for the Investigation of Arbitrary Incidents
- **ENOC:** European Network of Ombudspersons for Children
- **EOPYY:** National Organisation for Health Care Services Provision
- **ESAmA:** National Confederation of Persons with Disabilities
- **EYDAP:** Athens Water Supply and Sewerage Company
- **FEK:** Official Journal
- **FY:** File Number
- **IAPR:** Independent Authority for Public Revenue
- **IOI:** International Ombudsman Institute
- **JROs:** Joint European Return Operations
- **KEP:** Citizens Service Centres
- **KESY:** Educational and Counselling Support Centres
- **KYA:** Joint Ministerial Decision
- **KYPA:** Alien Health Care Card
- **MD:** Ministerial Decision
- **NPM:** National Preventive Mechanism
- **NROs:** National Return Operations
- **OAED:** Manpower Employment Organisation

- **OEB:** Land Reclamation Agencies
- **OEK:** Workers' Housing Association
- **OPCAT:** Optional Protocol to the UN Convention against Torture
- **OPEKA:** Organisation of Welfare Benefits and Social Solidarity
- **PAAYPA:** Provisional Insurance and Health Care Number for Aliens
- **PEKES:** Regional Centres for Educational Planning
- **PROKEKA:** Pre-removal Detention Centres
- **PWD:** Persons with Disabilities
- **RFRE:** Reception Facilities for Refugee Education
- **RIC:** Reception and Identification Centres
- **SAEP:** Professional Qualifications Recognition Council
- **SEPE:** Labour Inspectorate Body
- **TEI:** Technological Educational Institutes
- **UN:** United Nations



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