



EU funding for the integration of migrants and refugees in Greece: The clock is ticking

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Over the past year, there have been several developments in the EU policy and funding landscape guiding Europe's response to migration. Meanwhile, the COVID-19 pandemic has highlighted many of the existing policy and implementation gaps. With the arrival of new funding opportunities, it is vital to reflect on how EU funding has been used so far and how it can be better utilised going forward, particularly in light of needs resulting from the COVID-19 pandemic.

2021 is the first year of the new EU Action Plan on Integration and Inclusion (2021-2027), and the European Union is also seeking to define a comprehensive response to migration through its recent Pact on Migration and Asylum. At the same time, two large funding instruments are coming into play: the Multiannual Financial Framework (MFF) (2021-2027) and the NextGenerationEU recovery instrument (NGEU) (2021-2023). The latter is a special fund designed to help repair the economic and social damage caused by COVID-19 and lead Europe to a greener and fairer future. Both these instruments provide the means to access funding for the integration of refugees and migrants in Europe. It is vital that authorities across the EU

capitalise on this opportunity and implement integration programmes more strategically going forward.

Over 2021, several meetings and an online workshop were held by [Common Ground](#) and the [International Rescue Committee](#) (IRC) in Greece with relevant stakeholders and authorities (Ministry of Migration and Asylum, DG HOME, municipalities and municipal development agencies, UNHCR, IOM, EU funds managing authorities in Greece and civil society organisations) to identify barriers to integration and help discover possible solutions. The learnings generated from these meetings and the workshop have contributed to the content and recommendations of this policy brief.

While there have been improvements around integration efforts and fund management in Greece in the last year, serious gaps remain in national integration programming. Moreover, COVID-19 exacerbated barriers to integration by making access to information, housing, employment and education more difficult. The pandemic also highlighted the need for increased digitisation, improved digital skills and more comprehensive databases so that refugees and migrants can access services remotely. The implementation of the EU Action Plan on Integration and Inclusion could provide valuable assistance to national and local authorities on how to minimise the impact of COVID-19 and invest in integration. Close collaboration between regions, municipalities and central govern-

ment will be key to addressing some of these challenges.

This brief explores Greece's approach to the funding and implementation of integration programming. It intends to serve as a guide for civil society and other interested stakeholders on the availability and variety of EU funds, as well as developments related to existing sources of support. Additionally, it identifies challenges and gaps and makes recommendations on how best to address these. Doing so will be crucial to ensuring a successful, long-term and principled approach to the integration of refugees and migrants.

The structure of the paper is as follows:

1. Main EU funds available for the integration of refugees and migrants
2. COVID-19 and integration: new challenges and increased needs
3. Developments with regard to existing projects and upcoming initiatives
4. Further needs and recommendations

EU POLICY FRAMEWORKS relevant to integration

→Pact on Migration and Asylum (September 2020)

In September 2020, the EU launched its [Pact on Migration and Asylum](#), which is a series of legislative proposals, made in an effort to overcome the political deadlock that has dominated EU migration policies in the last few years. The Pact seeks to address different elements needed for a comprehensive European approach to migration, however it has been criticised by various actors for its focus on deterrence and returns. Although the Pact does not offer legislative proposals for integration per se, it lays out two key commitments in the area of integration:

1. Adopt a comprehensive Action Plan on integration and inclusion (see point below);
2. Implement the renewed European Partnership for Integration with social and economic partners and look into expanding the future cooperation to the area of labour migration¹.

→EU Action Plan on Integration and Inclusion (2021-2027)

The [Action Plan](#), as part of the EU's approach to migration put forward in the Pact on Migration and Asylum, covers all stages of the integration process and prioritises education and training; employment and skills recognition; access to health and adequate and affordable housing. To support integration efforts in these areas, the Action Plan underlines the importance of partnerships and promotes the participation of refugees and migrants in the policy making process. The Commission supports member states through funding, guidance, coordination and monitoring. While it is a non-legislative instrument, it is part of the EU's response to tackling the challenges linked to migration presented in the New Pact on Migration and Asylum and runs over the same period as the MFF for better alignment between funding and policy work.

1 [New Pact on Migration and Asylum includes integration measures](#), European Commission, 23 September 2020

EU FINANCIAL FRAMEWORKS relevant to integration

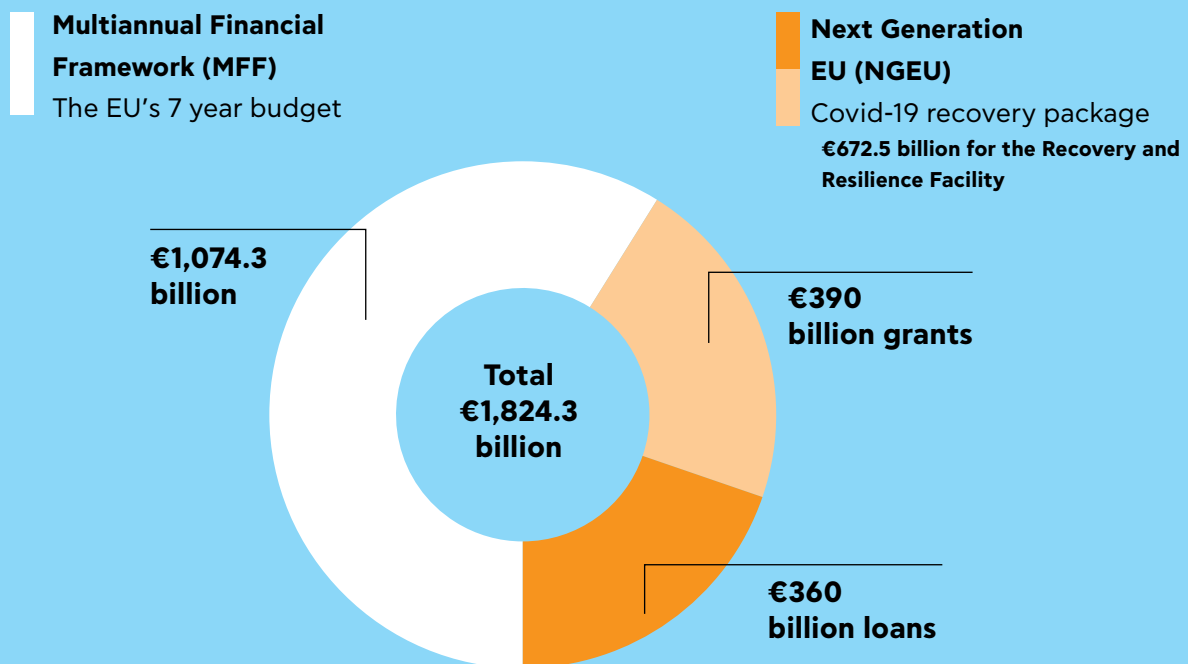
→ Multiannual Financial Framework (2021-2027)

The Multiannual Financial Framework is the main long-term budget the EU has at its disposal to implement its internal and external policies. The available amount for the EU27 for 2021-2027 is €1 074.3 billion. The MFF provides key funding tools for member states to finance integration in their national programming such as the Asylum, Migration and Integration Fund (AMIF), the European Social Fund Plus (ESF+) and the European Regional Development Fund (ERDF). Further information can be found at the European Website for Integration.

→ NextGenerationEU

NextGenerationEU is a temporary financial recovery instrument, which provides €750 billion for the EU27 to help them repair the immediate economic and social damage brought about by the COVID-19 pandemic. Combined with the MFF, this is the largest ever stimulus package financed through the EU budget, with its impact envisaged as creating a 'greener, more digital and resilient Europe.' It goes over the years 2021-2023 and is tied to the MFF.

EU budget 2021-2027



Graph source: https://ec.europa.eu/info/strategy/eu-budget/long-term-eu-budget/2021-2027/whats-new_en

1. Main EU funds available for the integration of refugees and migrants

Integration is a complex social and economic process, and a number of EU funds can be used for its support. The main funds focused on the integration of refugees and migrants are listed in this section.

Under the previous MFF (2014-2020), Greece benefited from €3.15 billion of EU support to manage migration. More specifically, Greece received €2.06 billion from the Asylum, Migration and Integration Fund (AMIF) and €643.6 million from the Emergency Support

Instrument (ESI), part of which was spent on integration activities.² Other funds, such as the European Social Fund (ESF), were also used for integration-related activities, albeit to a lesser extent.³

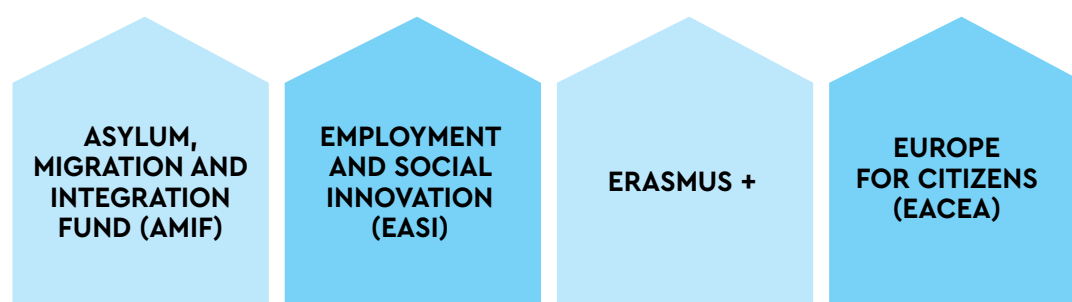
For the period 2021-2027, the financial envelope derived through the MFF for Greece is estimated at approximately €40 billion, a larger envelope than in the previous MFF according to officials interviewed. Greece also expects to receive €32 billion from NextGenerationEU, Europe's pandemic recovery fund. **This raises the total amount of funds that the country will receive from the EU for the period 2021-2027 to €72 billion.**⁴ The upcoming months are critical for the programming of the various funds as member states need to submit their MFF spending proposals to the European Commission.

EU funds supporting the integration of third country nationals, 2014-2020

BENEFICIARIES



EU FUNDS AVAILABLE THROUGH THE EUROPEAN COMMISSION



Graph source: https://ec.europa.eu/migrant-integration/main-menu/funding/eu-level?fbclid=IwAR1h8OXg-o5F-a35DaLGr_GEwm83xBzoD9QsoszVUEhUnok8u_Y-jrCvUug

2 [Managing Migration](#) - EU Financial Support to Greece, March 2021

3 Indicatively for 2014-2020 Greece received €15.35 billion in total [Cohesion Policy funding](#) (May 2014) financed through ERDF, ESF and the Cohesion Fund, however it is unclear how much of it was spent for the integration of refugees and migrants.

4 [Greece awaits €72 in EU support](#) 21 July 2020

1a. Asylum, Migration and Integration

Fund (AMIF)

EU level negotiations around AMIF came to a close in March 2021. In a positive development, AMIF will be included in the Common Provisions Regulation (CPR)⁵ which aims to simplify administrative procedures for the management of various EU funds that were complex and difficult to follow during the previous funding period. The partnership principle, which seeks to ensure that all partners are involved at all programming stages, will also be stronger during the 2021-2027 funding period.⁶ This Fund can finance activities for asylum seekers, i.e. activities during the reception stage. AMIF allocations for Greece will amount to approximately €500 million. Management of the AMIF in Greece falls under the Ministry of Migration and Asylum (MoMA), which has indicated that it plans to spend 35 percent of this total on early integration activities.⁷ However, there remains a concerning lack of a consensus throughout the EU as to what early integration means.

1b. Emergency assistance (EMAS)

Emergency assistance (EMAS) under AMIF will be limited in the 2021-2027 MFF compared to the previous one. As of April 2021, the EU has given Greece €1.36 billion from EMAS.⁸ Activities funded in the past by emergency funds will now have to transition to national funding. This could present challenges as funds managed under national programmes undergo stricter procedures and have less flexibility, including tighter reporting and time-consuming procurement rules. By drastically reducing the

use of EMAS, the Commission also aims at obliging member states to incorporate emergency responses in their national programmes through contingency plans.

1c. European Social Fund (ESF+)

Medium and long-term integration activities - usually associated with labour market integration - will be supported by ESF+, which was also approved in March 2021. The Fund is intended to be more flexible and simpler to access than before. The ESF+ merges several programmes including the European Social Fund (ESF), the Youth and Employment Initiative (YEI), the Fund for the European Aid to the Most Deprived (FEAD) and the European Health Programme. The exact ESF+ allocations for Greece are still unknown. However more information about the amount of available funds per country should be available soon as the ESF+ Regulation, worth €99.3 billion, is expected to enter into force in 1 July 2021.⁹

At least 25 percent of the fund is to be directed at the social inclusion of vulnerable groups, including migrants and refugees. Greece will also have to use 5 percent of the funds to tackle child poverty and 12,5 percent on youth unemployment.¹⁰ ESF+ can finance activities for the labour market integration of asylum seekers, refugees and other regularly residing migrants. With regards to social inclusion objectives, all migrants, including those who are undocumented, will be eligible to participate in ESF+ funded projects. **Together with AMIF, ESF+ will be the main instrument to finance integration activities for migrants and refugees, and synergies with other funds are encouraged and**

5 [Common Provision Regulation](#), 4 December 2020

6 [Partnership in practice](#), ECRE and PICUM Policy Note, March 2020

7 The EU threshold is 15 percent for integration and legal migration; 15 percent for asylum and 20 percent for solidarity among member states. There is no earmark for returns. For more information see ECRE's [policy note](#), 11 December 2020

8 [Managing Migration](#) - EU Financial Support to Greece, March 2021

9 [Green light from ESF+ from European Parliament and Council](#), European Commission, 9 June 2021

10 [Agreement on the European Social Fund+](#), ECRE, 5 February 2021

expected. The authority that manages the ESF+ in Greece sits under the Ministry of Development and Investments.

1d. Other MFF funds

Greece can also draw on funds for the integration of asylum seekers, migrants and refugees from other MFF resources, such as the European Regional and Development Fund (ERDF), Erasmus and the Citizens, Equality, Rights & Values programme (CERV). However, there do not seem to be any current integration proposals in relation to these funds from the Greek Government. This indicates that establishing synergies amongst the various funds has not been prioritised, despite such synergies being encouraged by the Commission and necessary for the efficient use of EU funding.

1e. NextGenerationEU (NGEU)

Greece is expected to receive €32 billion from NGEU (€19 billion in grants and €12.5 billion in loans), Europe's pandemic recovery instrument. COVID-19 has affected vulnerable populations, including refugees and migrants, disproportionately, hindering their access to healthcare, the labour market, education and housing. NGEU, or the 'Recovery Fund', aims to help EU member states repair the economic and social damage caused by the pandemic and support their green, just and digital transition. Since it is placed outside the MFF, procedures are simpler and more flexible. However, as the Fund is new, it remains unclear which authority will manage it in Greece.

EU member states are currently preparing their programme proposals for the above funds. Programme submission has been slowed down due to negotiations for the new NGEU fund, among other reasons. All national programmes are expected to be

agreed by September 2021, although continuous delays may extend this deadline. Commission officials shared that Greece has prepared early drafts of its integration plans and programme proposals; however, these require further development.

Greece's net takings from the European Union for the next seven years will come to €56.4 billion, which amounts to 4% of gross domestic product. For each euro the country contributes toward the European budget it will collect €4.6 through the Multiannual Financial Framework 2021-2027 and the NextGenerationEU fund. In the previous subsidy period (2014-2020) the ratio was 1:2.9.¹¹

Greece was also one of the first member states to prepare its Recovery and Resilience Plan,¹² required from each country by April 2021. Nevertheless, plans and programme proposals are being prepared without meaningful participation of relevant stakeholders, including civil society organisations that work on the ground and are well placed to make proposals and contribute to the design of projects based on the actual needs that they observe.¹³ Public consultations, where draft laws and policies are published on a consultation portal for comments, remain the main mechanism through which civil society organisations can provide feedback. While some ad-hoc consultation meetings with stakeholders have been organised in recent months, for example a consultation organised by the AMIF managing authority or an IOM consultation about the integration programme HELIOS, much more needs to be done to increase clarity and transparency around EU funding and opportunities for participation.

11 [Greece net recipient of over €56 bln from EU resources](#), 8 March 2021

12 ["NextGenerationEU"](#), 2 April 2021

13 [Joint statement by 56 civil society organisations regarding the National Recovery Plan - Common Ground](#), 5 April 2021

2. COVID-19 and integration: new challenges and increased needs

COVID-19 has affected the lives of millions of people and especially the most vulnerable. It therefore comes as no surprise that the onset of the COVID-19 pandemic and the response by the Greek authorities has further revealed gaps and challenges in the integration process

of asylum-seekers, refugees and migrants. Civil society organisations and other stakeholders working on the ground played a crucial role in supporting these populations during challenging times and swiftly adjusted their programmes and services to accommodate new needs generated by the pandemic. Still, there were significant unmet needs at the national and regional levels that were not addressed. Interviews with those affected identified the following issues:

→ Lack of **sufficient information from trusted sources** in languages that refugees and migrants understand. The lack of reliable information from trusted sources created fear, stress and uncertainty and resulted in long queues at public services, confusion about how to proceed with processes that required documentation, and fines by the police for 'unnecessary movement'.

→ Unfair and unjustifiable **restrictions of movement** applied to people living in refugee camps, where living conditions were already very difficult. Compared to Greek citizens, the measures imposed on people living in camps were stricter and considered by many stakeholders as disproportionate.¹⁴

→ **The continuing forced removals** of recognised refugees from camps, hotels and the ESTIA programme at a time when there were limited alternatives, resulting in thousands of people being faced with the risk of homelessness.¹⁵

→ School closure and the **online learning procedure** disproportionately affected refugee and migrant children. This was especially the case for those living in camps, who could not access school classes due to a lack of digital equipment, internet access or digital literacy.¹⁶ Likewise, informal educational activities for children and adults either moved to an online environment or ceased altogether.

→ **Access to employment.** The pandemic brought employment to a halt for many migrants and refugees. It prevented job seekers from securing employment and those already working in severely impacted sectors, such as the hospitality industry, lost their jobs. Many of the migrants and refugees who stopped working were unable to benefit from government assistance as the vast majority work informally or do not have access to the information needed to claim state subsidies.¹⁷

→ COVID-19 further increased obstacles to accessing **social services**. Securing a tax registration number (AFM), a social security number (AMKA and PAAYPA) or opening

14 [The Cruelty of Containment The Mental Health Toll of the EU's 'Hotspot' Approach on the Greek Islands](#) International Rescue Committee, December 2020 and [How Covid-19 has Highlighted the Anti-migration Agenda in Greece](#), FEANTSA, October 2020

15 [Joint NGO letter](#) about forced exits, 29 May 2020

16 [NGO open letter](#) about access to education, 9 March 2020

17 [Greece Country Report: Impact of the Covid-19 Pandemic on Labour Market Integration](#), Sirius, January 2021

a bank account has always been difficult for migrants and refugees. Without these, individuals cannot access the labour market, healthcare, rented accommodation or social benefits. The rocky transition to digitalised services, combined with migrants' and refugees' lack of Greek language and digital skills, further hindered the process of issuing essential documents.

→ **Delays in the asylum process** and other essential services. The Asylum Service was closed to the public for months and when services re-opened, delays and cancelled appointments for asylum interviews, family reunification requests or permanent residency cards were often reported.

All of the above obstacles left people in limbo, which exacerbated anxiety, uncertainty and fear of destitution. As a result, people's mental health, which was already under strain from the threat of COVID-19, was further negatively impacted.¹⁸ While the long-term impact of the pandemic cannot be fully measured yet, there is concern that mental health problems may increase in the future.¹⁹

Prior to Europe's recovery plan, AMIF and the ESI were activated to provide support for refugees and migrants in relation to the fight against COVID-19.²⁰ Emergency measures, such as emergency accommodation to shield of vulnerable people living in the hotspots on the islands, as well as further support for the provision of healthcare, were implemented with delays and were only partially successful. Longer term measures -even more crucial for the integration of migrants and refugees- such as the digitisation of courses and services also presented challenges. This was because the inception and roll-out of the new national digital systems were inadequately planned and, on many occasions, practically excluded migrants and refugees from services. Moreover, these populations

often did not have the means or digital skills to access the new systems.

From 2021 onwards, Europe's new recovery fund offers fast and flexible finance to mitigate the impact of the pandemic and is a great opportunity for the country to address existing challenges and strengthen preparedness for future crises. So far however, Greece's Recovery and Resilience Plan does not ensure a coherent response for a sustainable recovery that can cover gaps in its basic systems, including access to healthcare, education and employment. Based on our assessment of the Plan, the actions proposed remain ad-hoc and fragmented and synergies across sectors are lacking. Improved cross-sectoral coordination and collaboration among all stakeholders is needed. Likewise, while the Recovery Plan claims to ensure coherence and complementarity with the National Strategy on Integration,²¹ the latter has only been used partially since its adoption and, according to MoMA's announcements, will be amended soon. Consequently, it is unclear how challenges presented by the pandemic and the integration needs of asylum-seekers, refugees and migrants will be addressed.

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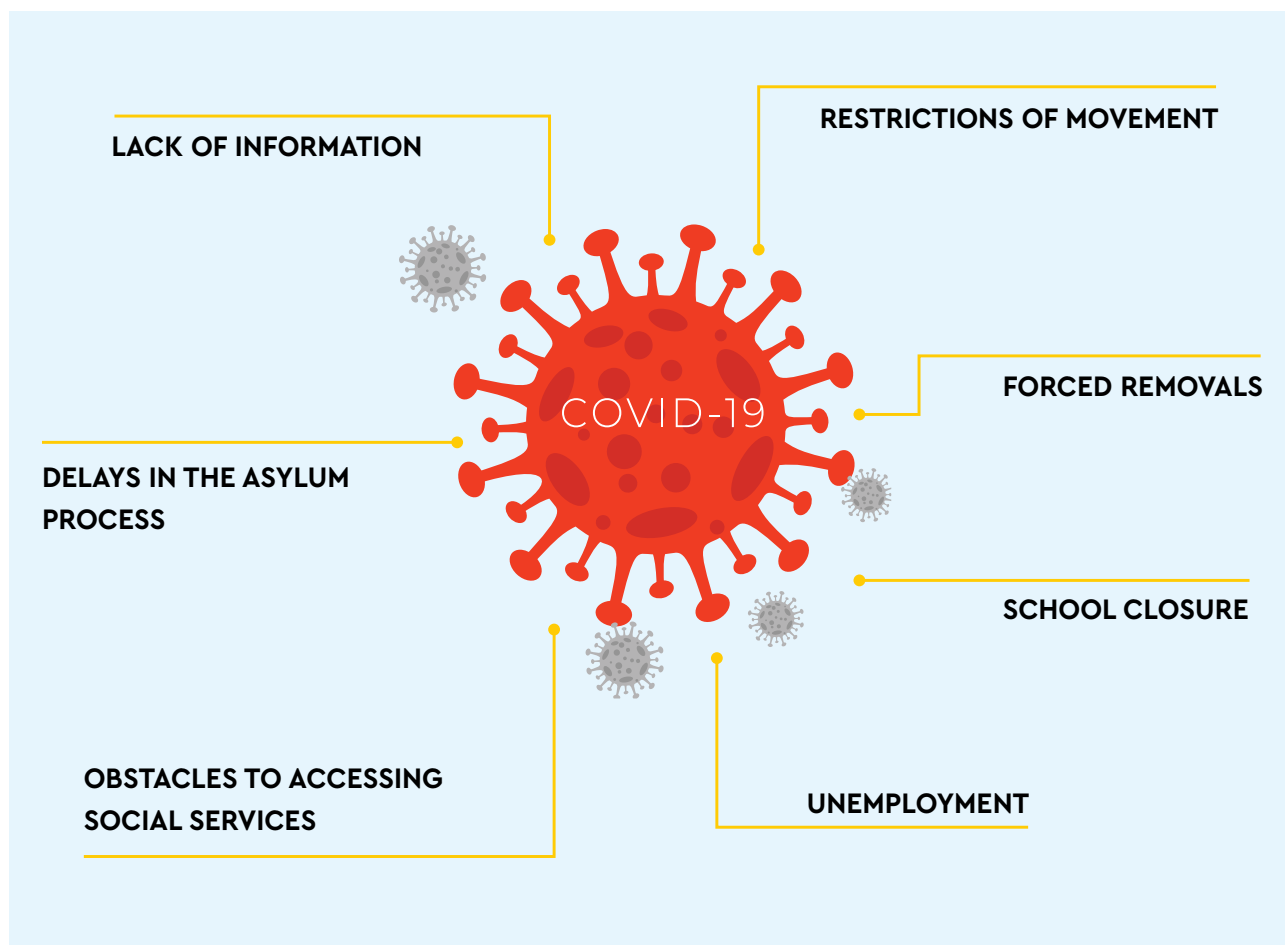
18 [The Cruelty of Containment: The Mental Health Toll of the EU's 'Hotspot' Approach on the Greek Islands](#) International Rescue Committee, December 2020

19 World Health Assembly recommends [reinforcement of measures to protect mental health during public health emergencies](#), WHO, May 2021

20 [Parliamentary questions](#), 6 August 2020

21 [National Strategy on Integration](#), July 2019

INTEGRATION CHALLENGES DURING COVID-19



3. Developments with regard to existing projects and upcoming initiatives

The integration of refugees and migrants has not been a priority for the Greek state over the last five years and as a result, efforts in this field have been limited and fragmented. The pretext that Greece is a transit country and that these populations are not interested in remaining has been used frequently to justify the lack of integration policies.²² The recent appointment of an Alternate Minister for Integration could be an indication that priorities are shifting, especially since the Alternate Minister announced that Greece's National Strategy on Integration, adopted in 2019, will be reviewed. The existing Strategy has only been partially implemented and programmes to date have been limited and not part of a coherent plan. So far, little information has been made available regarding the reviewed Strategy. This has left little space for the stakeholders expected to implement it (municipalities, migrant and refugee communities and civil society organisations) to contribute towards its development.

Ongoing delays in the MFF negotiations at the EU level affect planning at the member state level and have created funding gaps. As a result, there is currently no meaningful access to funding for new programmes nor for the continuation of existing ones. MoMA is trying to use limited unabsorbed AMIF funds from the 2014-2020 MFF to bridge these gaps. Stakeholders such as IOM are negotiating with the Greek Government and

the European Commission (DG Home) in order to ensure the continued implementation of the few ongoing programmes. They remain hopeful that the transition between the two funding periods will be implemented in a timely manner and with no gaps in service provision.

In the next section we present the four main integration projects that will continue to be funded by EU funds in 2021-2027. We also explore their challenges and identify new initiatives.

3a. HELIOS

The continuation of HELIOS, implemented by IOM, is one of the government's main priorities. The project aims at promoting the integration of beneficiaries of international protection into Greek society, through integration courses, accommodation and employability support, integration monitoring and sensitisation of the host community.²³ It is the only nationwide integration programme in the country. Since its inception in 2019, it has been funded by AMIF and its funding is currently secured until September 2021. Its next phase will be funded by the ESF+ Regional Operational Programmes, a positive development as integration has to be decentralised and supported at the local level. Nevertheless, bridge funding is needed to ensure there are no gaps in the provision of services. The Greek Government will undertake its full supervision most likely from the beginning of 2022.²⁴

Building on the experience gained from the implementation of HELIOS' first phase and taking into consideration feedback received from implementing partners and other relevant humanitarian stakeholders, IOM in co-

22 [Greece shouldn't have to integrate refugees, minister says](#), 28 May 2021

23 [Information about HELIOS](#), IOM

24 [Greece will undertake the full supervision of HELIOS](#), 26 May 2021

operation with MoMA, aims at addressing some shortcomings of the project.²⁵ This will be done by enhancing the services offered and introducing new ones under the different project pillars. The aim is to respond to employment, education and accommodation needs and gaps, by offering stronger employability support and job finding services, vocational training and better geographical distribution and accommodation incentives, including the possibility of longer rental support, from six to twelve months.

3b. ESTIA

Although not an integration programme *per se*, ESTIA can promote integration, as it covers basic accommodation and subsistence needs through the provision of urban accommodation in apartments²⁶ and cash assistance.²⁷ Until 2019, ESTIA was funded by ESI funds and from then onwards by AMIF, which will remain the programme's financial source as it caters for asylum seekers. At the beginning of 2021, the transition of the ESTIA accommodation programme from UNHCR to MoMA was completed and the entire programme is under the exclusive management of the Greek state.²⁸ The transition has not been smooth, and the government's revision of terms and requirements have forced several implementing partners to discontinue the implementation of the programme.²⁹ As a result, MoMA faced difficulties finding new partners and expanding places, as it was intended. Delays in processing payments to partners have also been reported. This in

turn has meant that the implementing partners cannot deliver the funds for the rent of thousands of apartments. This has led to the deterioration of living conditions for approximately 18,500 persons, of which 10,000 are children and 5,000 are extremely vulnerable people.³⁰

It remains to be seen whether the programme will be expanded and directly linked to integration initiatives for asylum-seekers, which currently do not exist for this population, or whether it will be linked to HELIOS in order to help refugees transition between the two programmes. Recent announcements that ESTIA places will be reduced as 'there are camps with available places',³¹ create concerns for civil society organisations and other stakeholders who are well aware that these facilities are not only unsuitable for the effective integration of newcomers, but they can also be dangerous and highly inadequate. At the same time, the Greek Government is to take over the management of the ESTIA cash assistance programme in October 2021 and has announced that, as of 1 July 2021, only asylum-seekers resident in state structures will be able to enjoy this right.³² The cessation of cash assistance to asylum seekers and refugees not residing in state accommodation is likely to result in some 24,000 people being stripped of financial support and independence, if they are unable to be referred and accepted into state accommodation. As a result, people will be forced to choose between living independently in cities without support or liv-

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25 [The time is now: A plan to realise the potential of Refugees in Greece](#), IRC, September 2020

26 Information about [ESTIA](#), UNHCR

27 Information about [cash assistance](#), UNHCR

28 [UNHCR hands ESTIA housing to the Government](#), page 3, March 2021

29 [Open letter](#) by one of the NGOs that stopped ESTIA after Ministry revised rules, 23 September 2020

30 [ESTIA 2021 leaves refugees unprotected and landlords unpaid](#), 25 April 2021 and [New payment delays for ESTIA II](#), 20 May 2021

31 [Greece will undertake the full supervision of HELIOS](#), 26 May 2021 and [A big setback in integration: The cut in aid to asylum seekers](#), joint NGO open letter, June 2021

32 While linked with ESTIA, currently the cash programme is available to all asylum-seekers who live in sites or are self-settled

ing in isolated and restricted camps with modest cash assistance.³³

3c. Migrant Integration Centres (KEMs)

One of the most important projects for the integration of migrants and refugees are the **Migrant Integration Centres (KEMs) in 11 municipalities**, which provide specialised services and support to migrants and refugees. KEMs aim at helping target populations improve their living standards, access the labour market and integrate.³⁴ The number of KEMs across Greece is to be expanded to 30 during 2021-2027, in specific municipalities, with criteria based on the existence of camps and the number of migrants and refugees in the area. Staffing the Centres with the necessary number of intercultural mediators -as a first step 50 new intercultural mediators will be recruited- has been challenging. According to officials interviewed, KEMs are public entities therefore they cannot hire non-Greeks. Efforts to resolve the issue are in progress. KEMs were funded by ESF in the previous MFF and are expected to continue being funded by ESF+ in the new MFF.

3d. Supported Independent Living for unaccompanied children

Supported Independent Living (SIL) in apartments for unaccompanied children aged 16-18 years old started as a pilot in 2018 and became an official form of accommodation and support for transition into adulthood in 2019.³⁵ Each SIL apartment hosts four children who receive a range of services, such as legal aid, individual and group psychosocial support, non-formal education and skills-building ac-

tivities. The SIL apartments are considered an alternative to the traditional institutional models of accommodation, with great potential to support children's transition to independence and their integration into the local community. At the moment, there are 104 SIL apartments in Greece,³⁶ most of which are funded by AMIF. Current funding for SILs runs until March 2022. Poor planning such as last-minute notification of calls and funding extensions have been reported by implementing partners. This makes it difficult for them to prepare their proposals as the requirements are often complex and time-consuming. MoMA's plan is to continue and expand SILs, using the same funding source.

3e. New integration programmes

Apart from the above-mentioned programmes, some **new initiatives** are in the making, most of which focus on labour market preparedness and integration. An AMIF-funded proposal was published in January 2021 to fund three integration programmes: **Multaka**,³⁷ which includes a two-year programme that will train 25 refugees to become museum guides; a programme for sensitising local communities by raising awareness about migration through **public campaigns**; and one for the **vocational training for refugees**. The implementation of these programmes is expected to start no sooner than 2022 which is indicative of how long procedures can take before a new programme starts. MoMA has also announced the implementation of a programme for the certification of **intercultural mediators**.³⁸ The first pool of participants is expected to be the 170 registered intercultural mediators in Greece,

33 [Greece's most vulnerable refugees are being denied safe shelter](#), 20 May 2021

34 Information about [Migrant Integration Centres](#)

35 Information about [Supported Independent Living](#)

36 Situation update: [Unaccompanied Children in Greece](#), 15 May 2021

37 The [Multaka](#) integration project in Germany. A similar project will be implemented in Greece.

38 Intercultural mediators certification [programme](#), 10 May 2021

who will receive formal certification and will be eligible to work in state services such as refugee camps, hospitals, schools and KEMs.³⁹

Another **proposal for the labour market integration of refugees** is included in Greece's National Recovery and Resilience Plan. The €32 million pilot programme aims to integrate refugees to the labour market by skills mapping, job counselling and language and digital skills courses, as well as vocational training for 18,000 refugees. This is to be done in collaboration with OAED, the National Manpower Employment Organisation.⁴⁰ Currently, this is the only NGEU-funded project that directly targets the integration of migrants and refugees in Greece.

MoMA is also interested in increasing accommodation programmes for asylum-seekers and refugees, especially those with severe vulnerabilities or disabilities who may never be able to become self-sufficient. A much-needed, new **supported-independent living programme for people with disabilities** is planned.⁴¹ A programme already exists for Greek citizens with 55 apartments⁴² and MoMA, together with the Ministry of Labour and Social Affairs, plans to create a similar one, where Greeks and refugees will live in the same apartment blocks in order to promote peaceful co-existence and integration.

More recently, MoMA and UNICEF signed a memorandum of cooperation which will be the framework for the implementation of a €34 million three-year comprehensive **plan for the effective entry of refugee and migrant children to education**, starting in August 2021. With the motto "All Children in

Education", it aims to deliver informal and formal education and ensure that by 2024 all children have access to uninterrupted quality education.⁴³ The programme will include linguistic and scientific literacy, European democratic citizenship and human rights education. Besides MoMA and UNICEF, the Ministries of Education, Interior and Health as well as DG HOME, UNHCR and IOM will be part of its coordination committee. Other stakeholders that are expected to be involved in the programme, including local and regional authorities and civil society organisations, will be informed about their participation at a later stage.

Information about the continuation of existing programmes and new integration related proposals for 2021-2027 is not widely available, including to civil society organisations and other key stakeholders. Therefore, some upcoming programmes may not be included in this brief. While the announcement of new integration projects is a positive development, these remain ad-hoc and are not part of a wider integration strategy, without which integration efforts may not be as successful. Delays in the implementation of new programmes, lack of information sharing and coordination among stakeholders are some of the major problems that persist. Furthermore, experience from the previous MFF (2014-2020) has shown that even when the government announces a call for proposals for integration related projects, it is occasionally cancelled without notice before being fulfilled.⁴⁴ Stakeholders are concerned that these problems will continue during the 2021-2027 MFF, unless better planning is undertaken.

39 [Positive Step for Refugees' Employment and Integration](#), UNHCR, May 2021

40 [National Recovery and Resilience Plan](#), page 108, 2 April 2021

41 [Announcement](#) of the new accommodation programme by the Ministry of Migration and Asylum

42 [Independent Living Programme for disabled persons](#)

43 [Memorandum of cooperation MoMA and UNICEF](#), 2 June 2021

44 Examples include a [call](#) for a pilot training and educational project to support the development of migrants' and refugees' vocational skills and a [call](#) for a pilot project for vocational training, certification of skills and the employability of unemployed refugees and asylum seekers

4. Further needs and recommendations

The integration programmes proposed by Greece so far, do not adequately address the needs and gaps identified by civil society organisations and other stakeholders, including local authorities. This section lists some of the major needs that should urgently be addressed and makes recommendations on how EU funds could be invested and managed more efficiently, to enhance integration. The proposals that follow are complementary to the recommendations made in the first policy brief of this project.⁴⁵

Specific programming needs identified by stakeholders:

- Large-scale, nationwide **language courses**: The lack of extensive language skills programming remains a major challenge. This is particularly true as regards non-formal education courses for adults. Migrants, refugees and asylum-seekers should have access to quality short and long-term language learning opportunities. This would also positively affect integration outcomes later in the process. With reference to HELIOS, following the acquisition of basic knowledge, access to flexible advanced language training should be encouraged.
- Increased **support for accessing the labour market**: Migrants, refugees and asylum-seekers require increased support in accessing the labour market. Programming should include skills mapping; job matching; on the job training; language and vocational training; apprenticeships and assistance in demonstrating qualification equivalence. While livelihoods programming should be led by the government at the national level, it would need to remain context-specific, recognising variations in the local labour markets. Mobilisation of the private sector should also be sought.
- Increasing the **capacity of the Migrant Integration Centres (KEMs)**: The plans to increase the number of KEMs across Greece is a welcome move. However, for KEMs to become fully functional, and to fulfil their mandate of being a one-stop shop, staff should be trained in protection and in relevant service provision. Additionally, more intercultural mediators should be hired, and case management should be offered where needed.
- **Housing programmes**: In a country where social housing schemes are lacking, current programmes that offer accommodation solutions (ESTIA, HELIOS, SILs and a few pilot projects) do not cover existing needs. Temporary housing solutions like hotels and camps hinder integration, especially as they are usually in remote places. MoMA has identified expanding their housing programmes as key to addressing needs, but many regions throughout the country are yet not willing to host asylum seekers and refugees. Those who do are not always interested in expanding existing programmes or introducing new ones, as they advocate for a more proportional allocation of refugees. Therefore:
 - **Stronger collaboration between national and local authorities** is needed to achieve the equitable distribution of refugees and migrants, which

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⁴⁵ [Multiannual Financial Framework 2021- 2027: an opportunity to enhance the integration of migrants, refugees and asylum seekers in Greece](#), pages 5-10, July 2020

would in turn help increase suitable housing options.

→ **Existing programmes need to be revisited.** For example, as mentioned above, the new terms and requirements of ESTIA II make it difficult for partners to continue implementing the programme and has led several of them to terminate the collaboration. This situation needs to be addressed as soon as possible. HELIOS should reinforce its housing component as less than half of all of its beneficiaries have managed to use the rental subsidies the programme offers,⁴⁶ while NGOs report homelessness upon termination of the programme. Interconnectedness of the two programmes is crucial for tackling homelessness and addressing other gaps.

→ Learnings and approaches from successful pilot projects like Curing the Limbo,⁴⁷ such as **case management**, need to be recognised as best practices and replicated more widely.

→ SILs for unaccompanied children and refugees with disabilities should be further supported and expanded. This would secure a move away from institutionalisation and promote integration.

- Access to **formal education**, especially for children residing in camps, is a further challenge that needs to be addressed:

Despite Greek and European Law⁴⁸ providing for free and compulsory education for children aged 4-14, refugee children have in practice almost zero access to schooling. For example, since regions became responsible for the transportation of refugee children to school most camps have been left without transportation options meaning children cannot get to school. Access to equipment is also needed (laptops, wi-fi connection etc) both during and after the pandemic, with the allocation of funds for distance learning.

- Access to **digital skills**: While Europe is preparing for its digital transition, much of which will be supported by the new Recovery and Resilience Facility, migrants and refugees will face inequalities and digital exclusion unless more relevant courses and learning opportunities are offered to them as well as access to digital infrastructure. Likewise, digitisation of public services should take into account the needs of vulnerable groups. For example, online systems should be easy to navigate, available in multiple languages and accessible via mobile phones, as migrants and refugees do not usually have access to computers.
- One overarching theme is the need for greater investment in **support upon arrival and a holistic approach to support transition from the reception to the integration phase**: Many asylum-seekers face great insecurity and difficult living condi-

46 HELIOS [factsheet](#), May 2021

47 Information about [Curing the Limbo](#)

48 Including but not limited to: Article 14 of the Charter of Fundamental Rights of the European Union concerning the right to education, Article 14 of Directive 2013/33 / EU and Article 27 of Directive 2011/95 / EU on recognition. In Greek law, Articles 28 and 51 of Law 4636/2019 foresee the education and access to education of minor asylum seekers and beneficiaries of international protection and Article 60(h) of Law 4636/2019 foresees the access of unaccompanied minors to education. Furthermore, Article 21(7) and (8) of Law 4251/2014 and Article 40 of Law 2910/2001 foresee unimpeded access of third country minors to education. On the banning of discrimination see Article 21 of the Charter of Fundamental Rights and Article 14 of the European Convention on Human Rights read in conjunction with Article 2 of Protocol 1 of the ECHR, and in Greek law see Article 3(2)(c) Law 4443/2016

tions upon arrival in Greece and these in turn impact their ability and readiness to integrate. So far, integration support focuses mostly on recognised refugees who usually receive their status months or even years after applying for asylum. This means that valuable time is wasted, people become demotivated, and integration

is hindered. Even where there are integration programmes such as HELIOS, there is a lack of sufficient information and support to access the programme. The EU Action Plan on Integration and Inclusion underscores implementing integration measures from the reception stage. The Greek Government should make use of the increased funding opportunities under the new framework to deliver this.

Key next steps in accelerating the integration of asylum-seekers and refugees in Greece:

→ Full alignment with the **EU Action Plan on Integration and Inclusion** at the national level, so as to enhance strong partnerships with municipalities, regions and other stakeholders to improve integration programmes, strengthen the active participation of migrant and refugee communities and allocate more EU funding for early-stage and long-term integration initiatives. Access to education, employment, health and social housing are the Plan's four sectoral priorities. The Greek Government should also prioritise these sectors.

→ The announcement of an updated **National Strategy on Integration** is a positive first step. To ensure its success, the government should develop an outcome-oriented action plan that responds to the needs of refugees and asylum-seekers by promoting the participation of all stakeholders, including refugees themselves in the design, implementation and evaluation stages. Long-term planning is essential, supported by a targeted and stable funding policy.

→ More **clarity and transparency** are urgently needed around integration needs and authorities' assessments, priorities, and programming of funds. This would require long-term planning with set timeframes and milestones, monitoring of progress, and increased accountability. Regular information exchange sessions with stakeholders, simplified guides outlining priorities and funding procedures, public awareness campaigns, timely publication of available funding instruments and calls, are all examples of how this could be achieved. Simplification of procedures for call proposals is also crucial.

→ Implementation of the **partnership principle**. The meaningful participation of all stakeholders, including civil society organisations that implement integration programmes should be fostered. This should take place at all stages of

fund management i.e. preparation of programmes, implementation of actions and monitoring and evaluation of the results. Active participation of migrants and refugees in the planning and implementation of the MFF is also essential.

→ **Cooperation and coordination** at all levels. MoMA should enhance cooperation with the Ministry of Labour and Social Affairs to coordinate efforts and create synergies for social housing and accommodation programmes; with the Ministry of Education and Religious Affairs for refugees' access to education; and the Ministry of Health for access to healthcare. It should also work more closely with municipalities and regions as much of the ESF+ funding for social inclusion will be distributed through the 13 regions. Coordination among various programmes is also needed. For example, HELIOS should closely cooperate with KEMs to enhance its outreach and programmes.

→ **Synergies among funds** are necessary to achieve integration goals. Projects can and should be co-funded by various funding instruments for better and long-term results. For example, vocational training and language courses can be funded by ESF+ while infrastructure for the same courses such as equipment, refurbishments etc can be funded by ERDF. Likewise, Greece's Recovery and Resilience plan should not be seen as a stand-alone initiative but part of a broader effort to improve policies for a better and more sustainable future, where social inclusion of marginalised groups is one of the key priorities. Therefore, the plan should be fully aligned with other funds and strategies and all its proposed programmes should be coherent and interlinked, taking into account the needs of the whole society, including those of migrants and refugees.

Publication date: July 2021

Disclaimer

The information in this brief was correct at the time of writing (June 2021)

Acknowledgements

Thanks to all the people from MoMA, the European Commission, Municipalities and Development Agencies, international organisations and NGOs, who agreed to be interviewed for and/or reviewed this brief. Many thanks also to everyone who participated in the online workshop of 6 April 2021. Finally, special thanks to Eleanor Paton, Melina Koumpou, Isabella Logotheti and Anastasia Sikiaridi for their contributions and to ECRE and PICUM for sharing their knowledge and their continuous support.

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This project has been supported by the European Programme for Integration and Migration (EPIM), a collaborative initiative of the Network of European Foundations (NEF). The sole responsibility for the project lies with the organiser(s) and the content may not necessarily reflect the positions of EPIM, NEF or EPIM's Partner Foundations.