

Country: GREECE

Key Policy Issues Paper¹

1. Specific Issues

Common European Asylum System (CEAS)	
Key policy issue 1:	Inadequate assistance to asylum seekers and beneficiaries of international protection / Inadequate reception capacities / Excessive use of detention
<p>Greece received in 2012 approximately 9500 new asylum applications. However, due to a considerable backlog of pending asylum requests, the number of asylum applications is in fact much higher. It is expected that by 2014, due to a substantial clearance of that backlog, the overall number of asylum applications under examination will drop to around 20 000.</p> <p>Since 2010, Greece has made progress in the area of asylum, as far as the examination of asylum claims is concerns, the reduction of backlog cases and the establishment of screening procedures for of mixed flows at border areas. A number of detention facilities that were considered inappropriate have also closed down. Despite this progress, a number of concerns remain:</p> <p>Greece's asylum policy is still too much focused on increasing the capacity of detention centres (from a few hundred to 7000 places currently), while capacities of open reception centres remain negligible (1000 for 35 000 applicants). Third country nationals (TCN) who are found in an irregular situation are systematically detained, as a rule for a period of 18 months. The same practice applies to asylum applicants who make an asylum demand while in detention. Commission has been urging Greece to use the unspent amounts under the 2013 Structural Funds to renovate existing buildings to be transformed into open reception centres. Such open centres would create alternatives to detention both for asylum seekers and TCN which do not have necessarily to be detained. Numerous reports and judgements of the European Court of Human Rights also refer to inappropriate detention conditions, in infringement of article 3 of the European Convention on Human Rights. Since April 2013, access to health care in detention centres has been suspended, apparently for lack of funding. Inadequate detention conditions have also been included in the Commission's infringement proceeding against Greece initiated in 2010.</p> <p>Furthermore, Greece has been experiencing recently serious incidents of violence against asylum seekers (and TCN in general) from members and supporters of extreme right-wing parties which saw an increase in their supporters and are becoming more influential in Greek society. Measures should also be taken in this area to ensure adequate protection of asylum seekers and persons in need of international protection.</p> <p>Desired outcome:</p> <ul style="list-style-type: none"> • Use of structural funds for increasing accommodation capacities. EASO and EU Task-Force on Greece can provide technical assistance on the preparation of the relevant project proposals. AMF can be used for covering some of the operational costs • Adequate reception conditions ensured to all asylum applicants, including under Dublin procedures. • Ensure that detainees have access to appropriate reception conditions [food, clothing, medication, 	

¹ This paper was prepared by the Commission services in the framework of the Policy Dialogue with Greece on the priorities for the two national programmes under the future Home Affairs funds - Asylum and Migration Fund (AMF) and Internal Security Fund (ISF).

interpretation, legal assistance] and that detention is applied only after an adequate individual examination of each case.

- Ensure training of police officers on the EU and international rules on detention.
- Setting up of a system to monitor the standards and capacity, in particular of detention conditions [e.g. via the Ombudsman].
- Setting up of a communication strategy/measures to raise awareness on the specific situation of asylum seekers and beneficiaries of international protection thus improving their image amongst Greek citizens.

Comments from the Member State:

Key policy issue 2: Poor quality of the asylum examination procedure

Greece still faces enormous challenges regarding the quality and speed of its asylum examination procedure. Recognition rates for beneficiaries of international protection at first instance are close to 0%. The situation has not improved despite continuous EU funding for the provision of training to police officers conducting asylum interviews. The police remains responsible for the examination on 1st instance of all asylum applications made before 6 June 2013 (thus prior to the beginning of operations of the Attica Regional Asylum Office and of the new Asylum Service). Access to the asylum procedure remains seriously impeded since applications can only be submitted in two offices in the whole country [in Athens and in Fylakio].

The Greek authorities are not granting any international protection status to Syrian nationals. Recognition rates at first instance in this case are also close to 0%, while in other affected EU Member States they reach practically 100%. Although not sent back (*refoulement*), Syrians (including asylum applicants) are simply released from detention and allowed to stay on the territory.

No special attention is also provided to vulnerable groups such as unaccompanied minors (UAM), whose access to appropriate representation is not ensured. Although the Public Prosecutors for minors are currently acting as temporary guardians of unaccompanied minors, it appears that the assistance provided by these officials is rather weak. Apparently, temporary guardians are merely informed of the presence of a UAM in the territory but rarely meet the minor or keep track of the situation. With the exception of Fylakio screening centre, there is no system for the identification of persons with special reception and procedural needs: very often this category of applicants does not benefit from any medical care and thus their health condition and well-being deteriorates further.

There is also no system for the provision of legal assistance and representation. The situation is particularly problematic in detention areas, where communication with the outside world is impeded.

Desired outcome:

- Improvement of the quality and speed of the asylum decision-making (notably through the training of decision makers but also of border guards, judges, etc.).
- Ensure that persons in need of international protection can have effective access to the asylum procedure, by establishing additional registration places for asylum claims, as described in Law 3907/2011.
- Ensure access to the asylum procedure for all TCNs, especially Syrians, in compliance with the Asylum Procedures and Reception Conditions Directive.
- Ensure access to legal assistance and representation.
- Establishment of a system of identification of special needs.
- Establishment of a national system of continuous evaluation of the asylum procedures and assistance provided to asylum seekers.

Comments from the Member State:
Key policy issue 3: Allegations of "push back operations" to Turkey
<p>This key policy issue should be seen in close connection to key policy issues n° 9 and 10 in section "Border management and Schengen governance".</p> <p>Recent reports continue to allege push back operations to Turkey, by the Greek authorities, of third country nationals trying to reach the territory via the Aegean Sea and Evros region. There are also allegations of cases of ill-treatment by the Greek police and coastguard against migrants during these "push back operations".</p> <p>Desired outcome:</p> <ul style="list-style-type: none"> • Ensure that "push backs operations" to Turkey do not occur. • Training of border guards in order to ensure that the asylum seekers are referred to relevant competent national authorities dealing with asylum.. • Training of officials in relevant competent authorities on EU and international law in the area of asylum, as well as on country of origin information (COI). • Ensure the application of Council Decision 2010/252/EU supplementing the Schengen Borders Code as regards the surveillance of the sea external borders in the context of operational cooperation coordinated by FRONTEX.

Integration of third country nationals (including beneficiaries of international protection)
Key policy issue 4: Increased effectiveness of integration measures
<p>Integration measures are necessary due to the fact that, in general, Third Country Nationals (TCN) can be disadvantaged in terms of access to services or facilities, or to the labour market, including as a result of lack of information and tools available to them and to the organisations and bodies they are in contact with.</p> <p>Despite Greece's economic and financial crisis, the number of TCN kept growing, as Greece has become one of Europe's major countries of transit and destination. In 2011 the share of TCN was 7% of the total population (double of EU average). Greece has seen in recent years a dramatic rise in unemployment, in particular among TCN: from nearly full employment the unemployment rate of TCN men jumped to 11% in 2009 and 40% in the last quarter of 2012. There are significant challenges related to over-qualification of TCN as well as wage inequalities if compared with Greek citizens, due to discrimination. TCN women are also vulnerable to exploitation, especially those employed in the domestic labour sector.</p> <p>The current economic and financial crisis, coupled with the high influx of TCNs and asylum seekers in recent years, has had severe repercussions on the public and political discourse on migrants, making the process of integration even more difficult. There is a worrying rise in xenophobia and racist violence against TCN that needs to be addressed in an effective manner.</p> <p>Desired outcome:</p> <ul style="list-style-type: none"> • In accordance with the European Agenda for Integration pursue the implementation of policies promoting the integration of third-country nationals, including beneficiaries of international

protection.

- Enhanced capacity to deal with integration issues and diversity, especially among NGOs, TCN associations and civil servants, as well as for policy evaluation for integration.
- Support to initiatives that provide useful information to TCN and beneficiaries of international protection and give them the means to defend their rights.
- While maintaining, as appropriate, a horizontal approach at the national level, particular attention should be paid to regional and local approaches, enhancing co-ordination between different governance levels and strengthening the involvement and capacities of local authorities and the cooperation between competent public bodies, NGOs and other actors.
- Enhanced culture of acceptance and understanding towards TCN and beneficiaries of international protection among the Greek society, to be achieved also through the development of a communication strategy that increases awareness and counters the negative perceptions of TCN, asylum seekers and beneficiaries of international protection.

Comments from the Member State:

Return Policy

Key policy issue 5: **Effective return policy - Strengthening of voluntary return, improvement of return procedures and detention conditions, and establishment of an effective forced return monitoring system**

Complying with fundamental rights standards and guaranteeing a dignified return procedure are core aspects of EU return policy. Voluntary return is the most humane, effective and less expensive method for returning irregularly staying third country nationals. Hence, the use of voluntary return should be given preference over forced return measures. Greece's return policy is still strongly focused on forced return. Renewed efforts to use voluntary return schemes should be made, including support to reintegration in countries of origin.

Greece issues a high number of return decisions but many decisions are not effectively implemented. Detention of third country nationals (TCN) is applied indiscriminately. TCN who are found in an irregular situation are systematically detained, as a rule for a period of 18 months. Illegally staying TCN subject to return procedure are also detained for public order reasons despite the fact that, according to the Return Directive, persons subject to return can only be detained if there is a risk of absconding or a risk that they avoid or hamper the preparation of return or removal process.

Besides, the living conditions in the Greek detention centres are bad and were qualified as inhuman and degrading by the European Court of Human Rights.

There is also a need to develop a forced return monitoring system.

Desired outcome:

- Stronger commitment from Greece to use voluntary returns, including provision of information on the programmes and conditions of return and promotion of reintegration measures in the countries of origin.
- Reduce the number of irregular TCN placed in detention centres by speeding up the return procedure (deliverance of travel documents from third countries) and by developing alternatives to detention
- Improvement of living conditions in the detention centres, in full conformity with the Return Directive.

<ul style="list-style-type: none"> • Speed up removal process by increasing the staff in charge of planning the voluntary /forced return of irregular migrants in the Greek administration/police and by further improving the cooperation with countries of origin or transit in order to increase the number of irregular TCN effectively returned and reintegrated. • Ensuring efficiency and credibility of the forced return monitoring system.
Comments from the Member State:

Border management and Schengen governance
<p>Key policy issue 6: Definition of a national strategy for border management</p>
<p>Greece still has to adopt a global strategy for border management, concerning all relevant areas (sea borders, land borders, first reception, central coordination). Such a strategy should comprehensively address all the necessary components such as central coordination, human resources, training needs, technical capabilities, as well as daily cooperation between different bodies involved in border management (namely the Hellenic Police, Hellenic Coast Guard, Ministry of Foreign Affairs, First Reception Service). It is also important that the strategy allows Greece to define policy and investment priorities, including the funding priorities within the ISF allocation available for the country, taking into account urgency of certain projects and the seven-year perspective.</p> <p>Desired outcome:</p> <ul style="list-style-type: none"> • Adoption of a national strategy for border management, including all components (sea borders, land borders, first reception, central coordination). • Definition of priorities and adoption of investment plan in line with the national strategy and the overall priorities.
Comments from the Member State:
<p>Key policy issue 7: Effective capacity of "first reception" to manage mixed flows at the borders</p>
<p>Greece has shown critical weaknesses in the capacity to provide adequate "first reception" to irregular third country nationals (TCN), in particular failing to provide up to standards accommodation facilities for first reception, as well as to address all the humanitarian needs (e.g. medical psychological assistance) or procedural requirements (e.g. information, interpretation) during the screening process.</p> <p>In 2012 the <i>First Reception Service</i> under Ministry of Public Order and Citizens' Protection was created to manage the first reception of TCN who have crossed irregularly the border. The first fully fledged "first reception centre" was opened in Fylakio (Evros region) in May 2013, with additional centres under development.</p> <p>While these positive developments are noted, there is a need to further consolidate the capacities of the <i>First Reception Service</i> and its responsiveness to manage effectively migratory flows at the borders, including emergency situations in the regions where the dedicated first reception centres do not exist and, therefore, the first reception/screening would need to be organised in an ad hoc manner in close cooperation with other Greek services on the ground.</p>

Desired outcome: <ul style="list-style-type: none"> • Fully functioning First Reception Service in the region of Evros. • Adequate level of facilities and services at all First Reception Centres. • Adequate level of facilities and services at screening centres (on the islands). • Development of screening mobile units capable of providing effective first reception and screening, in particular addressing urgent humanitarian needs, in possible emergency situations at any sections of the Greek borders. 	
Comments from the Member State:	
Key policy issue 8: Development of EUROSUR	
<p>The draft Regulation establishing EUROSUR (COM(2011) 873, as modified by Council and EP) foresees surveillance of the land and sea external borders, with possibility to include also air borders and checks at border crossing points.</p> <p>Development of EUROSUR is of particular relevance for Greece, considering the geographical position of the country. Greece is expected to apply EUROSUR as of 2 December 2013, together with the Member States located at the southern and eastern external borders. In comparison to other Member States, Greece is significantly late as regards making its National Coordination Centre fully operational. Furthermore, the interagency cooperation, in particular between the Hellenic Coast Guard, Police and the Armed Forces still needs to be considerably improved.</p> <p>Desired outcome:</p> <ul style="list-style-type: none"> • Ensure that the Greece's National Coordination Centre (NCC) meets the EUROSUR requirements as of 2 December 2013. This requires that at least the Coast Guard, responsible for sea border surveillance, and Police, responsible for land border surveillance, cooperate with each other via the NCC side-by-side. • Upgrade the national situational picture for EUROSUR by including information collected at the external land borders. • Possibility to make NCC also responsible for border checks and air border surveillance. 	
Comments from the Member State:	
Key policy issue 9: Effective management of external land borders, in particular of the land Greek and Turkish border	
<p>The Greek-Turkish land border has been the most critical point of entry of irregular migrants into the EU. An extension of the existing automated border surveillance system has started (around 12,5 km already completed near Orestiada, with additional 35Km to be completed by the end of the year), with the possibility for a further extension of 90km (Alexandroupolis). After the launch of the "Shield operation" in Evros on 2nd August 2012, Greece has registered a dramatic decrease of irregular crossings at that land border; however the sustainability of such decrease is not certain. It is necessary to consider the further reinforcement of technical capabilities of the Greek services responsible for border management in Evros and, if necessary, to plan for their possible replenishment with new funding.</p> <p>In order to address this specific vulnerable border section, Greece should put in place an effective and sustainable integrated border management system for the whole Greek-Turkish border. The process should be based on a clear plan defining strategic, tactical and operational objectives of border control</p>	

<p>in the Evros region, with indication of both existing and still necessary equipment, transport means, required infrastructure and communication structures as well as sustainable staffing (as a follow up to Operation Shield). The strategy should also focus on the further reinforcement of the cooperation between the competent Greek and Turkish authorities at a local level.</p> <p>Desired outcome:</p> <ul style="list-style-type: none"> • Comprehensive long term strategy for the management of the Greek-Turkish land border addressing technical needs, sustainable staffing, cooperation with Turkey. • Coherent investment plan (in line with the above strategy) for all the land external borders. • Structural actions to ensure the control of the Greek-Turkish land border.
<p>Comments from the Member State:</p>
<p>Key policy issue 10: Effective management of external maritime borders</p>
<p>Greek maritime external borders (in particular the Greek islands along the Turkish coast) are particularly exposed to the risk of irregular migratory flows. Although the maritime border seems to be under control for the moment, since the start of the "Shield operation" there was an increase in the arrivals of irregular migrants at sea borders. The migratory pressure makes the situation very volatile, depending on the development of the international scenario, in particular on the political and economic situation in Northern African and the Middle-East. It is therefore essential to foresee an investment plan which ensures an adequate capacity of surveillance of the external maritime borders also considering the most advance technology available (e.g. the use of modern radar systems, equipment to detect small boats, etc.).</p> <p>Desired outcome:</p> <ul style="list-style-type: none"> • Adoption of medium/long term strategy for the management of the maritime borders. • Adoption of coherent investment plan (in line with the above strategy). • Adoption of structural actions to ensure the control of the sea borders and enhance the capacity to cope with possible increase in migratory flows/crisis situation. • Possible deployment of adequate technology to improve the capacity in border management.
<p>Comments from the Member State:</p>
<p>Key policy issue 11: Implementation of the Schengen <i>acquis</i></p>
<p>According to the latest Schengen Evaluation, weaknesses were identified as regards the establishment of the National Coordination Centre for EUROSUR (<i>see policy issue n°8</i>), the need to reinforce the monitoring and coordination between activities at regional and central level, the need to remedy weaknesses detected for border checks, the need to reinforce training, the need to establish a five-year investment plan based on priorities at land, sea and air borders (<i>see policy issue n°16 and 17</i>), the need to reinforce investments in the Evros region (<i>see policy issue n°9</i>). It should also be noted that new shortcomings might arise, following the next Schengen Evaluation visit foreseen for 20-25 October 2013. Greece is encouraged to indicate to the Commission any difficulties or shortcomings in the implementation of the Schengen <i>acquis</i> as well as to explain how the recommendations of the latest Schengen Evaluation have been addressed.</p> <p>Desired outcome:</p> <ul style="list-style-type: none"> • Implementation of recommendations and actions from Schengen Evaluation reports.

Comments from the Member State:**Internal security****Key policy issue 12: Drug trafficking**

Even though the Greek drug markets are rather small, increased seizures have been registered as regards cannabis, cocaine and psychoactive substances, possibly pointing at a growing trafficking trend. Heroin originating from South-West Asia is smuggled into Greece through the Balkan route. Figures from 2010 suggest that 41.6 % of the heroin seized comes from Turkey. Raw cannabis is imported by land, mainly from Albania. Cocaine is smuggled into Greece mainly by sea and land from other European Union countries. Bulgaria remains the main source for synthetic psychotropic substances seized in Greece, while for a significant proportion of synthetic drugs the country of origin remains unknown. In the last couple of years, while the quantity of cannabis and cocaine products seized increased, the quantity of heroin and ecstasy seized continued to decline.

Desired outcome:

- Increased number of seizures, prosecutions and convictions.
- Enhanced cooperation with other EU Member States and EU agencies, with increased flow of information to Europol.

Comments from the Member State:**Key policy issue 13: Trafficking in Human Beings**

Greece is a transit, destination and - although very limited - source country of trafficking in human beings (THB). According to the latest (April 2013) Eurostat statistical report on THB covering the years 2008-2010, the total number of identified and presumed victims of THB in Greece was 76 (2008), 121 (2009) and 92 (2010). The number of prosecutions of suspected traffickers is relatively high: 73 (2008), 131 (2009) and 80 (2010). No data has been provided by Greece on the number of convictions. Most of the women are trafficked for sexual exploitation, while children and men are put into forced labour: hundreds of children, mainly Roma from Albania and Romania, are subjected to forced labour, notably as street sellers, beggars, or to commit petty crimes.

According to Europol, of all the organised crime hubs, the South East (Greece) registered the greatest expansion in recent years, as a result of increased trafficking in human beings via the Black Sea, proliferation of numerous Balkan routes for illicit commodities to and from the EU, and a significant increase in illegal immigration via Greece. This trend is confirmed in Europol's SOCTA 2013 report, which sets THB as priority.

On the other hand, the overall increase in xenophobic rhetoric - as reported by the Council of Europe (CoE) Commissioner for Human Rights - raises concerns over the vulnerability and protection of potential and effective victims of THB.

Greece is in the process of aligning its national legislation with EU and Council of Europe (CoE) standards, lacking however the capacities to adequately implement it. Focus should be placed on actions to decisively address prevention and protection of victims, especially children. The prosecution and convictions rates should be increased, notably in the framework of a comprehensive approach

bringing together all relevant state authorities, in close cooperation with civil society organisations.	
Desired outcome: <ul style="list-style-type: none"> • Effective prevention, protection, detection and prosecution of THB, including compensation and other forms of assistance to victims of THB through durable solutions,. • Reduced demand in all forms of THB and higher number of proactive investigations and confiscations of instruments/benefits of THB. • Improvement of national referral mechanism, increased operational capacities of first line responders, and increased cooperation with civil society organisations nationwide. • Enhanced training and cooperation between the different actors, including police, labour inspectors, immigration and asylum officials, border guards, trade unions, civil society organisations, etc. • Improved data collection and reporting. 	
Comments from the Member State:	
Key policy issue 14:	Anti-corruption policy (in particular in public procurement procedures)
<p>According to the 2011 Eurobarometer on corruption, 98% of the Greek respondents (highest percentage in the EU) believe that corruption is a major problem in their country. In Transparency International's Corruption Perception Index Greece's score has fallen from 4.7 in 2008 to 3.4 in 2011, the lowest score in the EU in 2012 and ranking 94th of a total 176 countries. Business-related surveys show a similar perception: Greece ranked 96th of 144 countries in the World Economic Forum's Global Competitiveness Index and sits among the lowest scores on favouritism and diversion of public funds. Still according to Transparency International, the black economy is estimated to represent as much as a third of Greece's gross national product with tax evasion costing upwards of US\$20 billion a year.</p> <p>Establishing effective anti-corruption policies, including a comprehensive reform of the judiciary and the public administration, are amongst Greece's commitments under the EU bailout plans. In late 2012, the European Commission Task Force and the Greek authorities agreed on a Road Map on Anti-Corruption as a basis for future strategic measures in this area. The Greek authorities have developed an anti-corruption national strategy/action plan at the end of 2012 and more recently (early 2013) appointed a national anti-corruption coordinator. Work is on-going, with the support of the European Commission Task Force on Greece, to develop a strategy in the area of public procurement reform that would also comprise anti-corruption measures.</p>	
Desired outcome: <ul style="list-style-type: none"> • Effective implementation of the anti-corruption related measures to be covered by the future public procurement reform strategy. • Strengthened and coordinated ex-ante and ex-post controls of the legality and integrity of procurement procedures, including at regional/local level and on EU-funded projects. • Enhanced cooperation between public procurement authorities and anti-corruption authorities that would lead to increased detection and dissuasive sanctioning of corrupt practices (including conflicts of interests and favouritism). • Effective mechanisms in place for systematic corruption risk assessments to address vulnerable areas related to public spending and public procurement. • Strengthened internal control mechanisms within contracting authorities. 	
Comments from the Member State:	

Key policy issue 15:	Develop financial investigation in all serious and organised crime cases to dismantle criminal networks, provide prosecutable evidence before the judge, develop monitoring and detection tools and trace criminal assets
<p>Greece is particularly sensitive to illegal money flows from the Western Balkans and major tax evasion. It needs to implement the new Financial Action Task Force (FATF) standards. Most particularly, given penetration of the licit economy by organised crime, there is a general need to enhance financial investigation as a mean to support criminal investigation in view of better detection and dismantlement of criminal networks beyond the sole front line offenders, in compliance with the interpretative note to FATF recommendation 30 and 5th cycle of mutual evaluation on financial crime and financial investigation final report recommendations, as well as the recommendations specifically made in the country report. Furthermore, as all MS will be assessed within the FATF or MONEYVAL on their compliance with the new standards, there is a need to promote relevant actions.</p> <p>Desired outcome:</p> <ul style="list-style-type: none"> • Development of a strategic approach aiming to ensure, as far as possible, the opening of a financial investigation in parallel to criminal investigations in all serious and organised crime cases. • Improvement of detection, investigation and prosecution capabilities. • Increased number of financial investigators and financial analysts recruited and trained. • Significant rise in the number of financial investigations developed and increased results. 	
Comments from the Member State:	
Key policy issue 16:	Weak implementation of information exchange mechanisms ("Prüm Decision" and "Swedish Initiative")
<p>The exchange of information is the core mechanism of law enforcement cooperation in the EU. The so-called "Swedish Initiative" and the "Prüm Decision" are two key instruments in this area. Although the deadline for implementation of those mechanisms was 19 December 2008 and 26 August 2011 respectively, Greece has not yet fully implemented these legal acts. The Swedish Initiative has not yet been transposed into national law and, regarding the "Prüm Decision", Greece is not yet operational in the automated exchange of DNA, fingerprints and vehicle registration data.</p> <p>Desired outcome:</p> <ul style="list-style-type: none"> • Full implementation of the Prüm Decision (2008/615/JHA) by stepping-up investments in technical equipment and training, as well as the administrative, legal and organisational requirements for the exchange of data. • Transposition of the Swedish Initiative (2006/960/JHA) into national law and integration of its provisions into the workflow processes of relevant Greek authorities. • Establishing a comprehensive national SPOC (Single Point of Contact) for international information exchange in line with EIXM² recommendations. 	
Comments from the Member State:	

² European Information Exchange Model, Communication COM(2012) 735 published in December 2012.

Key policy issue 17:	Improve capabilities in the fight against cybercrime at national level and contribute to improvement at EU level
<p>The Commission and the High Representative have adopted a joint European Strategy for Cyber-security aiming for a safe and resilient digital environment and effective prevention and response to cybercrime, in respect of fundamental rights and European values. The European Cyber-security Centre (EC3) has prioritised the lack of capacity to mitigate the risks of cybercrime as the main issue of concern for EU cyber-security³.</p> <p>Greece has been identified as suffering from a particularly weak Network and Information Security system. It should improve its resilience in the face of cyber incidents. It should also seek to further build its capacity to prevent and respond to cybercrime and should foster exchange of information and cooperation between the different communities involved (including the public sector, private companies, CERTs, law enforcement and academia). Furthermore, according to the most recent Cybersecurity Eurobarometer, its citizens feel poorly informed about the dangers of cybercrime.</p> <p>Desired outcome:</p> <p>In line with the EU Cyber-security Strategy:</p> <ul style="list-style-type: none"> • Enhance its network and information security and improve its resilience. • Identify gaps and further strengthen its capability to investigate and combat cybercrime. • Use funding to support bodies that make the link between research/academia, CERTs, law enforcement practitioners and the private sector. • Support programmes that allow for active participation and contribution of Greece to the European Cybercrime Centre at Europol (EC3). • Foster awareness-raising and information campaigns on cybercrime. 	
Comments from the Member State:	
Key policy issue 18:	Radicalisation towards terrorism and violent extremism
<p>Greece faces a general threat from terrorism. The country is mostly concerned with left-wing/anarchist terrorism and with the underlying radicalisation process. In addition, there is an increase of attacks by extremist right-wing groups against migrants and asylum seekers both in Athens and elsewhere. Attacks may involve explosives and automatic weapons against Greek institutions, shopping malls, media interests, diplomatic targets and the police. On 3 June 2013 there were 3 such incidents in Athens, all at offices related to the government. During 2008-2010, the number of terrorist incidents in Greece amounted to 219, which represent a substantial share (43%) of the total incidents in the EU during that period.</p> <p>Acknowledging alarming levels of xenophobic violence, the government created specialized police units to address the issue.</p> <p>Desired outcome:</p> <ul style="list-style-type: none"> • Enhanced awareness of the phenomenon of radicalisation among frontline practitioners. • Increased know-how to prevent, recognise and tackle the phenomenon of radicalisation. • Establishment of partnerships and platforms for knowledge and exchange of information and experience between practitioners and stakeholders, based on the experience of the Radicalisation Awareness Network (RAN). 	

³ Virtual Global Taskforce Environmental Scan 2012.

- Support initiatives challenging terrorist propaganda, including initiatives promoted by victims of terrorism.

Comments from the Member State:

Key policy issue 19:

Substantial improvement of management capacities of Greek administration to ensure adequate management of EU funding in the area of Home Affairs

Greece needs to substantially improve its administration's management capacities, in view of ensuring adequate management of EU funds. Poor management of EU funds by the Greek authorities is a serious problem preventing the efficient and effective use of EU financial support, notably in the area of Home Affairs. This is a key issue that, if not urgently addressed, could seriously compromise the launching and effective implementation of Greece's national programme both for the Asylum and Migration Fund and the Internal Security Fund.

Most particularly, Greece should put in place an effective and workable institutional and legal framework in line with the requirements of the relevant legal basis. Greece should urgently improve the administrative capacity of all the entities involved in the implementation of EU Funds (central managing authorities as well as beneficiaries), notably in terms of better internal coordination and allocation of human resources. Procurement procedures must be improved and an adequate multiannual planning of procurement for the whole period 2014-2020 should also be developed, based on a comprehensive and detailed identification of needs. A simplification of internal workflows for the preparation of tender documents is urgently needed, as well as the advanced preparation of the appropriate technical specifications. In this context, Greek authorities are strongly encouraged to use FRONTEX's support for tenders' specifications for purchasing key equipment.

Desired outcome:

- Effective management structure (legal and institutional aspects) in place as of 2014.
- Significant improvement of administrative capacity of authorities involved in the management of EU Funds (managing authorities and beneficiaries), including as regards internal coordination and staffing.
- Significant improvement in procurement process, especially of its preparatory stages (multiannual planning, drafting of technical specifications, preparation of tender documents, etc.).

Comments from the MS:

2. General issues

Internal security	
Key policy issue 20:	EU policy cycle on serious and organised crime - participation of Greece
<p>The policy cycle is a clear expression of the new post-Lisbon Treaty reality as it provides for a genuine attempt of EU level coordination of MS operational cooperation in the field of cross border crime phenomena.</p> <p>Greece has not been very active in the implementation of the first trial policy cycle 2011-2013 (it is a member of Western Balkans, illegal immigration, THB and cybercrime EMPACT⁴ projects, not leading any actions), but it expressed interest in participating in 5 out of 9 policy cycle priorities 2013-2017: illegal immigration, counterfeit goods, cybercrime (all three sub priorities), firearms and organised property crime. It volunteered to be the co-driver of the illegal immigration⁵.</p> <p>Desired outcome:</p> <ul style="list-style-type: none"> Increased engagement of Greece in the new policy cycle 2013-2017 especially regarding the following SOCTA (Serious and Organised Crime Threat Assessment by Europol) recommendations: illegal immigration, where Greece is a transit country, drugs trafficking, cybercrime as well as MTIC⁶ and excise fraud. Reinforcement of national infrastructures for data collection and analysis concerning international organised crime, as well as their transmission to Europol, which are precondition for EU Member States' participation in policy cycle. 	
Comments from the Member State:	
Key policy issue 21:	Implementation of the EU Law Enforcement Training Scheme (LETS)
<p>LETS is a new policy area on high quality law enforcement training on cross-border / EU matters. It focusses on 4 areas where training supported by or organised at EU level adds value to existing training at national level. Greece should assess to what extent law enforcement officials are trained in 1) basic knowledge on the EU policing context and 2) in depth knowledge on bilateral cooperation/instruments. Implementing training under strand 1 and 2 of the LETS is a national competence. The target group, the Greek police, employs approximately 50.700 officers according to available Eurostat statistics. Greece participates and contributes actively to CEPOL courses.</p> <p>Desired outcome:</p> <ul style="list-style-type: none"> Improve cross-border law enforcement cooperation. Improve a cross-border minded culture of law enforcement officers through training. 	

⁴ EMPACT: European Multidisciplinary Platform Against Crime Threats. There are 8 EMPACTs overall.

⁵ The new 9 priorities for the policy cycle 2013-2017 (illegal immigration, THB, cybercrime, Missing Trader Intra Community (MTIC), excise fraud, firearms, property crime, counterfeit goods, synthetic drugs production and trafficking as well as cocaine & heroin trafficking), were agreed by COSI on 17 April 2013. They are contained in the Policy Advisory Document drafted jointly by the Presidency and the Commission. They have been endorsed with the Council Conclusions by the JHA Council on 6-7 June.

⁶ Missing Trader Intra Community (MTIC) fraud, in other words VAT fraud.

Comments from the Member State:

Border management and Schengen governance

Key policy issue 22: **Use of modern technology at the border**

Greece does not seem to have any Automated Border Control (ABC) systems in place or planned. With the view of facilitating travel of EU citizens and in the future also of Registered Travellers, Greece is encouraged to start using ABC systems at its busiest border crossing points.

Desired outcome:

- Investment leading to use of interoperable modern technologies in line with European standards where they exist. For example ABC gates for EU citizens should also be able to be used for the future Registered Traveller Programme (RTP) component of the smart borders initiative, by implementing fingerprint readers.

Comments from the Member State:

Information Systems

Key policy Issue 23: **The implementation of Visa Information System (VIS) and increasing the 'consular coverage' in Schengen visa issuance**

VIS has been in operation since 11/10/2011; however it is necessary to ensure its full roll-out. In this context, the Commission highlights the need to ensure adequate funding for these purposes, either under relevant EU instrument or national budget. Due to the fact that "first time applicants" shall have to appear in person either at the consulate or external service provider (ESP) in order to provide their fingerprints, Greece - even though it has a rather wide consular network - should still consider concluding representation arrangements with other Member States, making more use of the various forms of consular cooperation and/or step up the cooperation with ESPs.

Desired outcome:

- Full implementation of VIS including VISMAIL available and in operation.
- VIS roll-out in consulates from the third and last set of regions and for the issuance of visas at the border.
- Preparation for the introduction of fingerprint verifications at the border.
- Efficient operations and customer-friendly service to visa applicants through increased consular cooperation by establishing Common Visa Centres (i.e. representation by/from other MS, or resource pooling with other MS, or joint cooperation with external service providers involving several MS).
- Further improve "consular coverage" in Schengen visa issuance, in order to avoid a disproportionate effort on the part of visa applicants to have access to consulates/ESPs.

Comments from the MS:	
Key policy issue 24:	The implementation of Schengen Information System II, including development of backup capability
<p>SIS II has been in operation since 9 April 2013. As the SIS II is fundamental for the functioning of the Schengen Area, maintaining it fully operational should present a core priority for all Member States, in particular by ensuring the necessary infrastructure for the system and for its operation, and allowing the evolution of the national components in line with the evolutions agreed for the central system. Equally important, the running of the SIRENE offices should also be treated as a high priority, both in terms of adequate staffing and appropriate technical support.</p> <p>As a mission critical system for the security of the Schengen area and the management of migration, SIS II is a high availability system, requiring 24/7 access for users. Therefore, it is essential that it has a full disaster recovery/business continuity plan.</p> <p>As of today, SIS II contains approximately 48 million sensitive records, out of which more than 1 million are on identity (and related) information on persons, including witnesses in criminal procedures or persons subject to discreet checks due to the threat they represent to public or national security. Accordingly, the protection of both the persons concerned, as well as the security within the Schengen area must be adequately ensured at the national level too, including via up-to-date cyber security measures.</p> <p>Desired outcome:</p> <ul style="list-style-type: none"> • SIS II available and in operation. • SIS II has of a full disaster recovery/business continuity plan which includes, depending on national architecture, elements such as: full national system redundancy on identified key components/processes, with a stand-by arrangement guaranteeing industry standards, continuity of service, as well as a further fall-back plan, with mechanisms to switch to queries in central SIS II when national queries are no longer available from the national site. • SIS II national system is resilient to cyber-attacks in terms of physical, computer and data security. 	
Comments from the MS:	

Development of communication strategy aiming at raising general awareness on EU Home Affairs policies	
<p>In view of strengthening EU policies in the area of Home Affairs, each EU Member State is invited to develop communication strategies that would allow to raise the awareness of the population in general and target groups in particular on the measures being taken at EU level.</p>	
Comments from the MS:	