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**Deep Dive on Child Poverty
and Social Exclusion:
Unmet Needs and Access Barriers
EU Child Guarantee in Greece**

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Project overview

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Abbreviations

ALMPs - Active Labour Market Policies

AROPE – At risk of poverty and social exclusion

Art. - article

CG - Child Guarantee

EaSI - European Union Program for Employment and Social Innovation

ECHR - European Convention on Human Rights

ECG – European Child Guarantee

ECSR - European Committee of Social Rights

EFKA - Unified Single Social Insurance Fund

ELSTAT - Hellenic Statistical Authority

ESF - European Social Fund

ESC - European Social Charter

EU - European Union

GMIS - Guaranteed Minimum Income Scheme

GSEE - Greek General Confederation of Labour

ILO - International Labour Organization

HE - Higher Education

MofLSA - Ministry of Labour and Social Affairs

NA - National Agency

NEET - Not in education, employment, or training

NILHR - National Institute of Labour and Human Resource

NSSI 2014-2020 - National Strategy for Social Inclusion 2014 - 2020

OAED - Greek Manpower Employment Organization

PD - Presidential Decree

PES - Public Employment Service

RESC - Revised European Social Charter

SSI - Social Solidarity Income

UACs - Unaccompanied children

UN - United Nations

ICESCR - International Covenant on Economic, Social and Cultural Rights

UNCRC - United Nations Convention on the Rights of the Child

UNCRPD - United Nations Convention on the Rights of Persons with Disabilities

VET - Vocational Education and Training

Background to the European Child Guarantee

In 2015, the European Parliament called on the European Commission and the European Union Member States, *“in view of the weakening of public services, to introduce a Child Guarantee so that every child in poverty can have access to free healthcare, free education, free childcare, decent housing and adequate nutrition, as part of a European integrated plan to combat child poverty”*.

The European Commission proposal for the European Child Guarantee (ECG) was adopted by the European Union’s Employment, Social Policy, Health and Consumer Affairs Council (EPSCO) in June 2021. The focus is on effective and free access to quality services in the fields of early childhood education and care (ECEC), education, health care, nutrition and adequate housing.

The European Commission (DG Employment) has partnered with the UNICEF Regional Office for Europe and Central Asia (UNICEF ECARO) to test how the ECG could work in practice and provide recommendations for the successful design and implementation of the ECG. As part of this engagement, UNICEF ECARO has been working since July 2020 with national and local governments from seven EU Member States (Bulgaria, Croatia, Germany, Greece, Italy, Lithuania, and Spain) and key national and local stakeholders in these countries.

Part of this support has included the development of 'policy deep dive' country studies. The overall objective of these deep dives is to support the national governments in the seven pilot countries to design, implement, and evaluate ECG. The deep dives are designed to provide the information and evidence base that governments need for the development of evidence-informed Child Guarantee National Action Plans (CGNAPs). The deep dive analyses look at policies, services, budgets, and mechanisms to address children’s service access barriers and unmet needs in the five thematic areas of the ECG: early childhood education and care (ECEC), education, health, nutrition, and housing.

The deep dives have been designed to help governments identify the children who should be prioritized in their future CGNAPs and to recommend the policy measures that need to be put in place at national, regional and local levels to complement existing policy measures that have been effective in providing positive outcomes for children. In addition, the deep dives identify, compile and recommend indicators that could be used to monitor and evaluate the impact of the CGNAPs and recommendations on how to address the identified gaps in data.

For more information on the ECG, see:

<https://ec.europa.eu/social/main.jsp?catId=1428&langId=en>

I. Child poverty and social exclusion in Greece

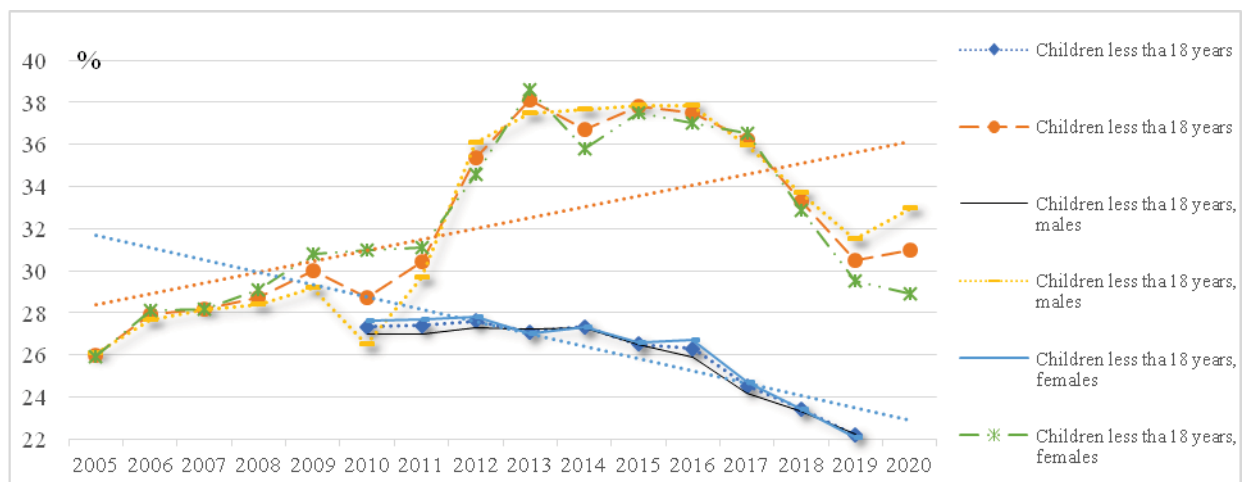
Eurostat and the Greek statistical authority (ELSTAT) publish and provide periodically information on at-risk of poverty or social exclusion rates in Greece and the EU. These figures have systematically ranked Greece in the adverse positions within the EU, especially when focusing on child poverty or social exclusion¹.

A. Main data

Poverty Profile of Children in Greece

According to the most recent data, in 2020, **almost 31 per cent of children (less than 18 years old) in Greece lived in households experiencing poverty or social exclusion, while it was slightly higher for males (33%) and somewhat lower for females (28.9%)**. As shown in Figure 1, in 2008, child poverty or social exclusion affected 28.7 per cent of children while thereafter, during the crisis period, it obviously worsened continually and peaked in 2013 (38.1%). Moreover, during the period 2013-2018 the difference from the EU-27 average exceeded the 11 percentage points, while in 2020 it decreased to 8 percentage points (Figure 1).

Figure 1 Share of children at risk of poverty² or social exclusion, less than 18 years old by sex, Greece and the EU-2027, * 2005 -2019/2020³



* Data for period 2010-2019 / Source: Eurostat. Authors elaboration from EU-SILC, (ILC_PEPS01)

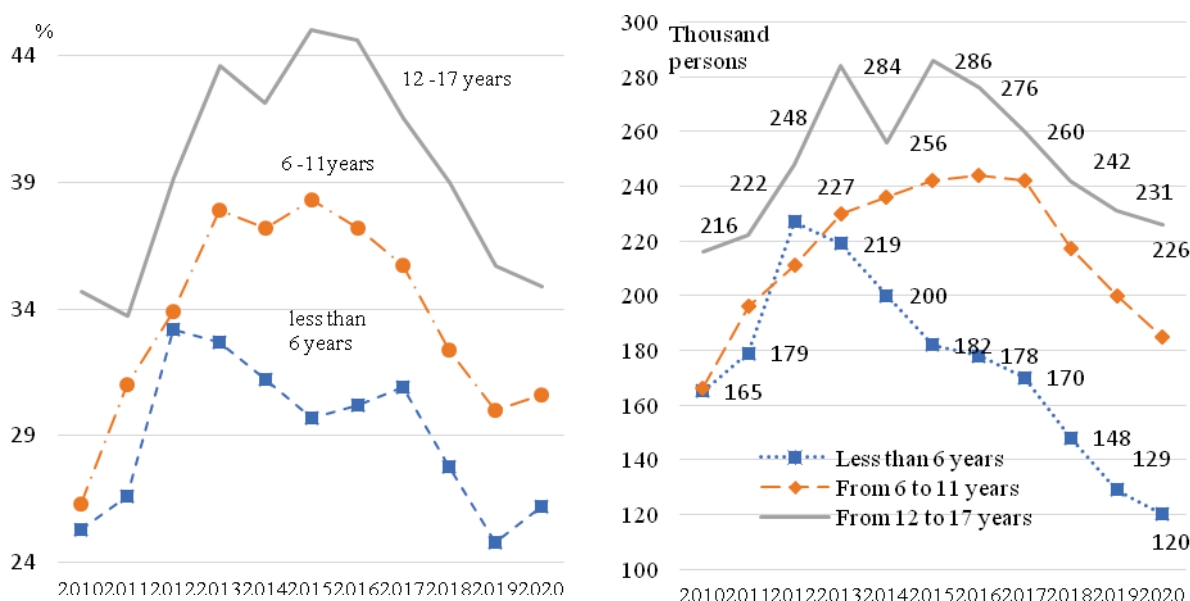
¹ Children are defined here as persons below the age of 18.

² **At risk of poverty or social exclusion**, abbreviated as **AROPE**, corresponds to the sum of persons who are either at **risk of poverty**, or **severely materially and socially deprived** or **living in a household with a very low work intensity**. People are included only once even if they are in more than one of the situations mentioned above. The **AROPE rate** is the share of the total population which is at risk of poverty or social exclusion. It is the main indicator to monitor the EU 2030 target on poverty and social exclusion and was the headline indicator to monitor the **EU 2020 Strategy** poverty target. For more detailed information, please check: [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:At_risk_of_poverty_or_social_exclusion_\(AROPE\)](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:At_risk_of_poverty_or_social_exclusion_(AROPE))

³ It should be noted that as AROPE is a composite indicator, some components refer to year t-1.

Since childcare, education, health, housing and social protection policies are associated to different age categories, and the risk of poverty or social exclusion could be differentiated according to age, the breakdown of the broad child age category is of high significance for both analytical and policy design purposes. Given that the different age groups of children reflect varying developmental stages and childcare urgencies, the following breakdown is used in this report: 0-5, 6-11 and 12-17 years. **Based on this, it seems that in Greece the risk of poverty or social exclusion is higher among children aged 12-17 years (34.9% in 2020 or 226 thousand), compared with the 30.6% (or 185 thousand) of children aged 6-11 years and the lowest rate (26.2% or 120 thousand) of children aged less than 6 years (Figure 2).**

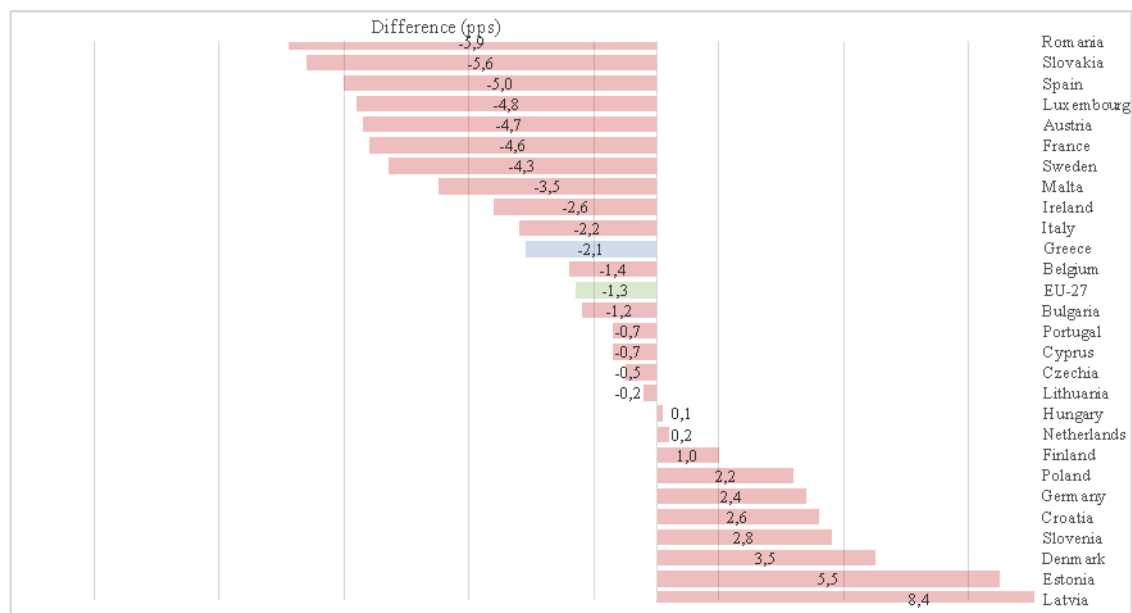
Figure 2 and 3 At risk of poverty or social exclusion for children by age groups: 0-5 years; 6-11 years and 12-17 years (% , thousand), in Greece, 2010-2020



Source: Eurostat. Authors elaboration from EU-SILC, (ILC_PEPS01)

The risk of poverty or social exclusion among children varies considerably across the EU Member States while in most cases, including Greece, it was well above the risk for the whole population (Figure 4).

Figure 4 Difference between the share of children less than 18 years at risk of poverty or social exclusion relative to national average (%), 2019/2020*



*Year 2020 for Belgium, Bulgaria, Denmark, Estonia, Greece, Hungary, Netherlands, Austria, Romania, Slovenia, Finland / Source: Eurostat. Authors elaboration from EU-SILC, ([ILC_PEPS01](#))

The Household structure/composition of AROPE children

Household composition is a factor affecting whether or not the children in that household are likely to be at risk of poverty or social exclusion. The 2020 distribution of households shows that the share of households in which children live can vary (Figure 5). At EU level, around three in ten households (28.7 %) include children, while in Greece it is lower (26.3%). **Particularly, children living in different types of households have different at risk of poverty or social exclusion profiles (Figure 5).⁴ In the case of people living in single-person households with dependent children in Greece, 53.3 % were at risk of poverty or social exclusion in 2020, compared with 36% of single person households and 22.1 % of people living in households with two adults and one dependent child.**

More essentially, the risk of poverty or social exclusion for a single person with dependent children was 23.3 percentage points higher than the average for all types of households with dependent children (53.3 % compared with 30 %). Some other household types with dependent children also recorded relatively high rates for the risk of poverty or social exclusion. Notably, the risk was 35.4 % for people living in households with two adults and three or more dependent children and 33.7% for people living in households with three or more adults with dependent children.

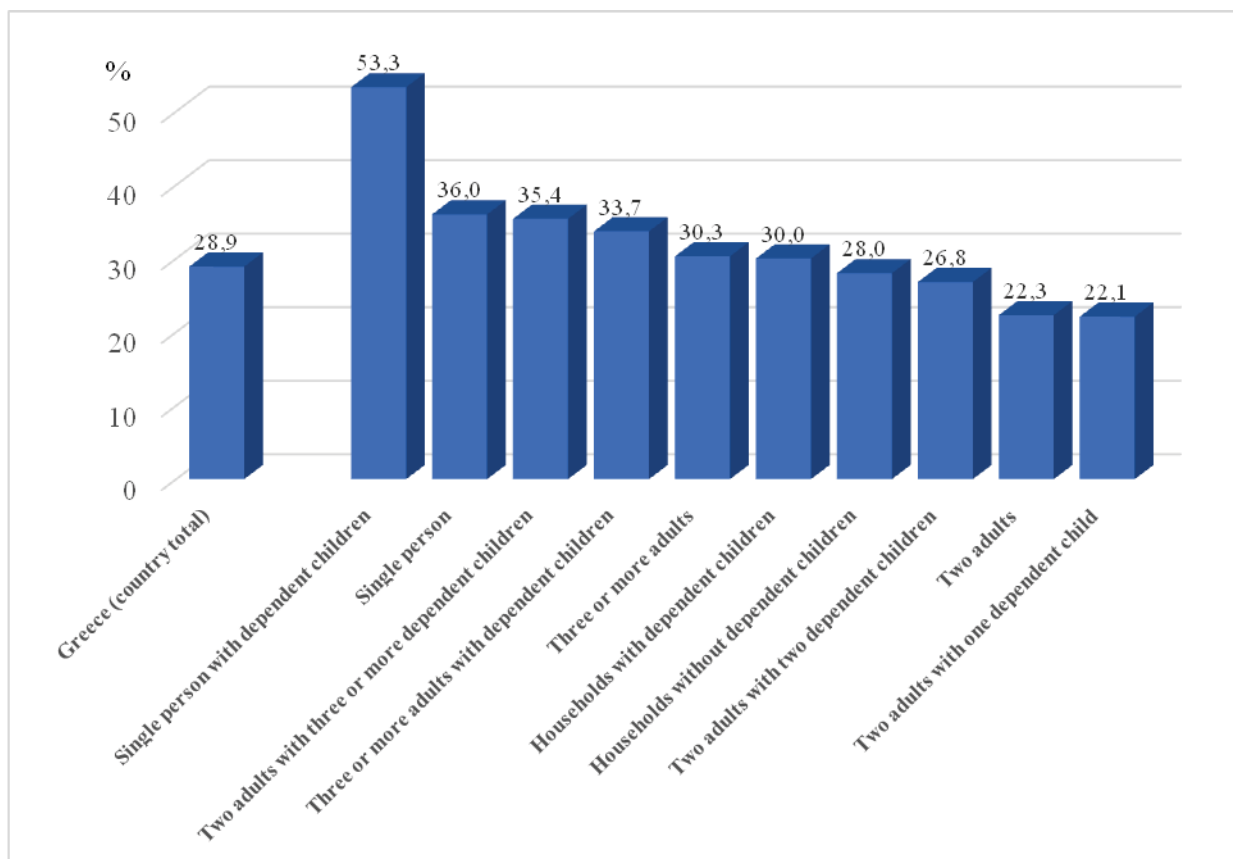
It should, however, be noted that the risk of poverty or social exclusion in Greece for people living in households with dependent children was two percentage points higher in 2020 than that for people living in households without dependent children.

⁴ When defining household types, the concept of dependent children (individuals aged less than 18 years or aged 18-24 years if economically inactive and living with at least one parent) is used instead of the concept of children (aged less than 18 years).

As such, people living in some households with dependent children also had a relatively higher risk of poverty or social exclusion.

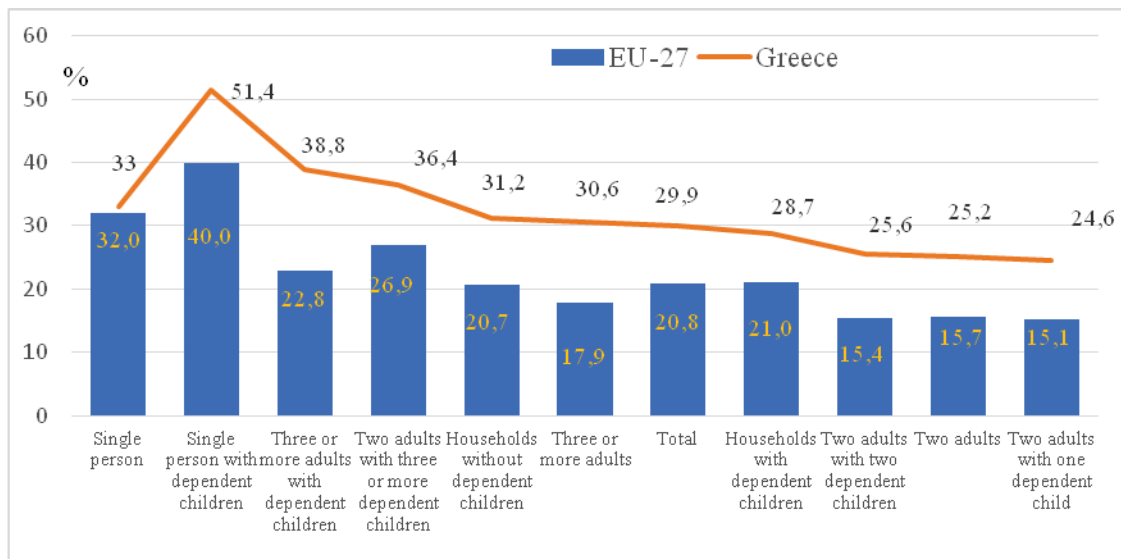
Figure 6 shows the share of population at risk of poverty or social exclusion, by household type and the percentage difference between Greece and EU-27 in 2019. It is clear from the results that for all household types the rates for Greece are substantially higher than the rates for the EU-27.

Figure 5 Share of the population at risk of poverty or social exclusion, by household type, Greece, 2020



Source: Eurostat. Authors elaboration from EU-SILC, ([ilc_peps03](#))

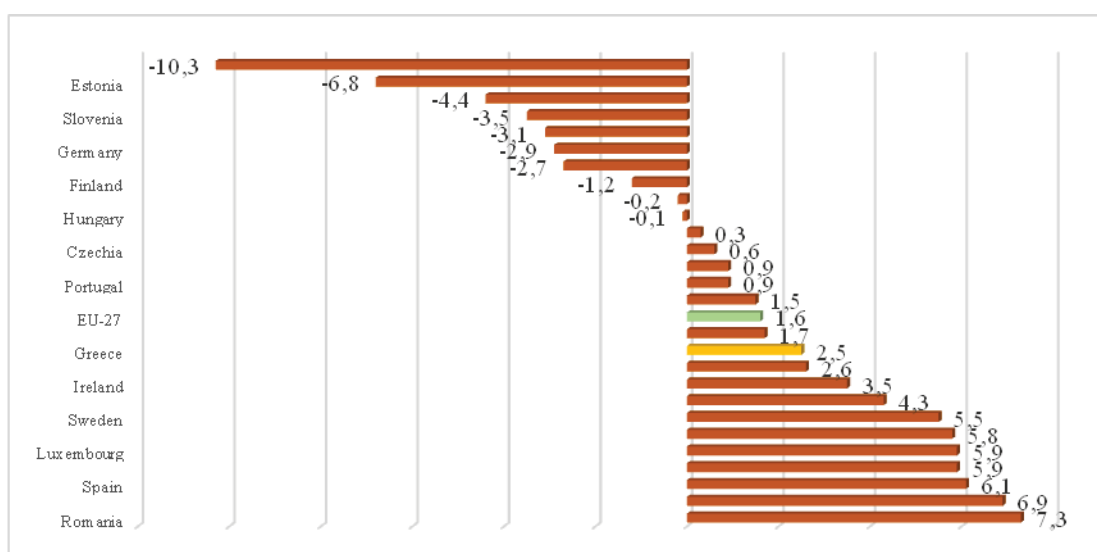
Figure 6 Share of the population at risk of poverty or social exclusion, analyzed by household type, EU-27 and Greece, 2019



Source: Eurostat. Authors elaboration from EU-SILC, (ilc_peps03)

Figure 7 illustrates the difference of the risk of poverty or social exclusion rate among those under the age of 18 and over 18 in 2019 or 2020. **In the EU27, the risk of poverty is higher for those people under the age of 18. The same is observed for countries such as Greece** and other countries including even Sweden. On the other hand, in a series of countries, the risk of poverty or social exclusion is higher for those over 18 years old.

Figure 7 Difference (percentage points) in at risk of poverty or social exclusion rate between children less than 18 years and adults (more than 18 years), in the European Union, 2019/2020*



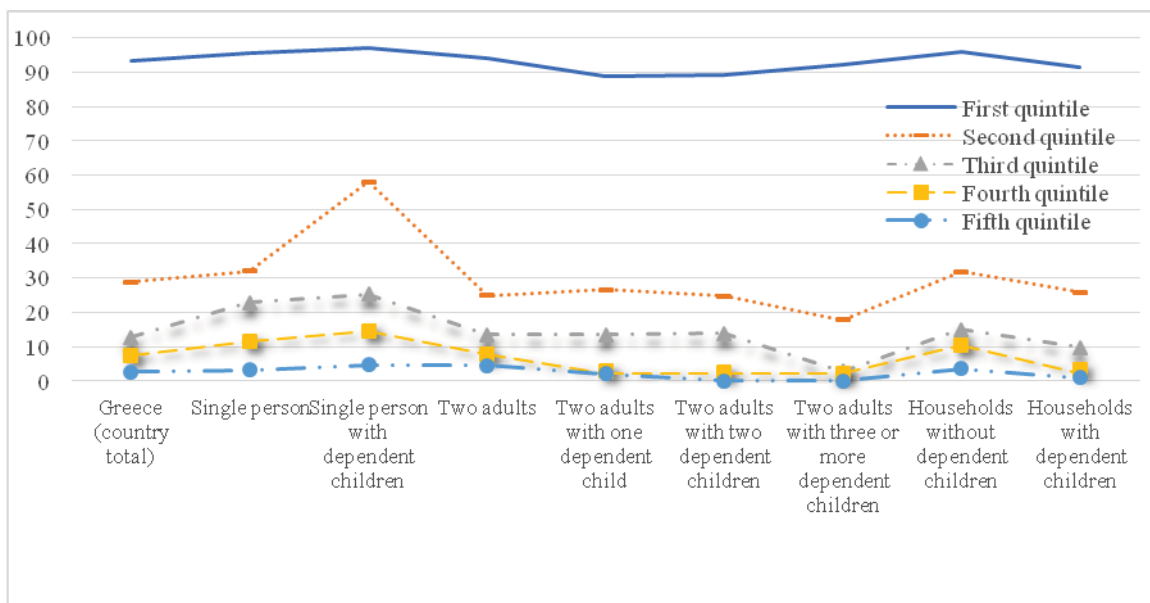
*Year 2020 for Belgium, Bulgaria, Denmark, Estonia, Greece, Hungary, Netherlands, Austria, Romania, Slovenia, Finland / Source: Eurostat. Authors elaboration from EU-SILC, (ILC_PEPS03)

The income quintile of AROPE children

According to Eurostat⁵, income quintile groups in social statistics are computed on the basis of the total equivalized disposable income attributed to each member of the household. The first quintile group represents 20% of the population with the lowest income (an income smaller or equal to the first cut-off value), and the fifth quintile group represents the 20% of population with the highest income (an income greater than the fourth cut-off value).

Based on this, it is not surprising that almost 90% of all types of households in the lowest income quintile are faced with the risk of poverty or social exclusion, while the situation for single-person households with dependent children is extremely high (97.2%) and continues to be high also for the second income quintile (58%). Some other household types with dependent children also recorded relatively very low rates for the risk of poverty or social exclusion, for example, in the third quintile, 3 % for people living in households with two adults and three or more dependent children as compared with the rate for two adults with one child (13.5%) or even two children (13.6%). More generally, the risk of poverty or social exclusion for a single person with or without dependent children is relatively high, as compared with other household types up to the third quintile (Figure 8).

Figure 8 Share of the population at risk of poverty or social exclusion, analyzed by household type and income quintile, Greece 2020



Source: Eurostat. Authors elaboration from EU-SILC, (ILC_PEPS03)

⁵ For full definition of income quintile group in social statistics see: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:Income_quintile_group

1. Risk of poverty for children

In 2010, 23% of children under the age of 18 were at risk of poverty in Greece, a percentage that gradually increased during the period of the economic crisis and peaked in 2013 (28.8%). **In 2020 about 21.4% of children of the same age in Greece were at risk of poverty (21.1% in 2019)**, in contrast to the lowest rate in the EU-27 (18.5% in 2019).⁶

The analysis of data reveals in Figure 9, that **in Greece the risk of poverty increases with the age of the child. For the period 2010-2020 the incidence is highest among children aged 12–17 years.**

On the other hand, the incidence of poverty is 1.7% lower than the total population among children aged less than 6 years. Generally, the trend is that in all age classes the rates for Greece exceeds the respective rates for the EU-27, while children at age 12-17 years have the worst incidence of poverty and those at age below 6 years are in a better situation.

Turning to households with dependent children, Figure 10 indicates that in Greece persons living in a single parent households were at the greatest risk of poverty in 2019 (36.9%) while in 2020 the greater risk was observed among households with two adults and three or more dependent children (27.2%).⁷ Among the household types shown in Figure 10 and 11, both at the EU-27 and Greece households composed of "two adults with one dependent child" were the least likely to be at risk of poverty.

However, in 2019 Greece had higher at risk of poverty rates (approximately +3%) compared to EU in all type of households.⁸ The highest at risk of poverty rate in Greece concerns single-parent families (53%), followed by two adults with three or more children and three or more adults with dependent children and the lowest concerns two adults with one dependent child.

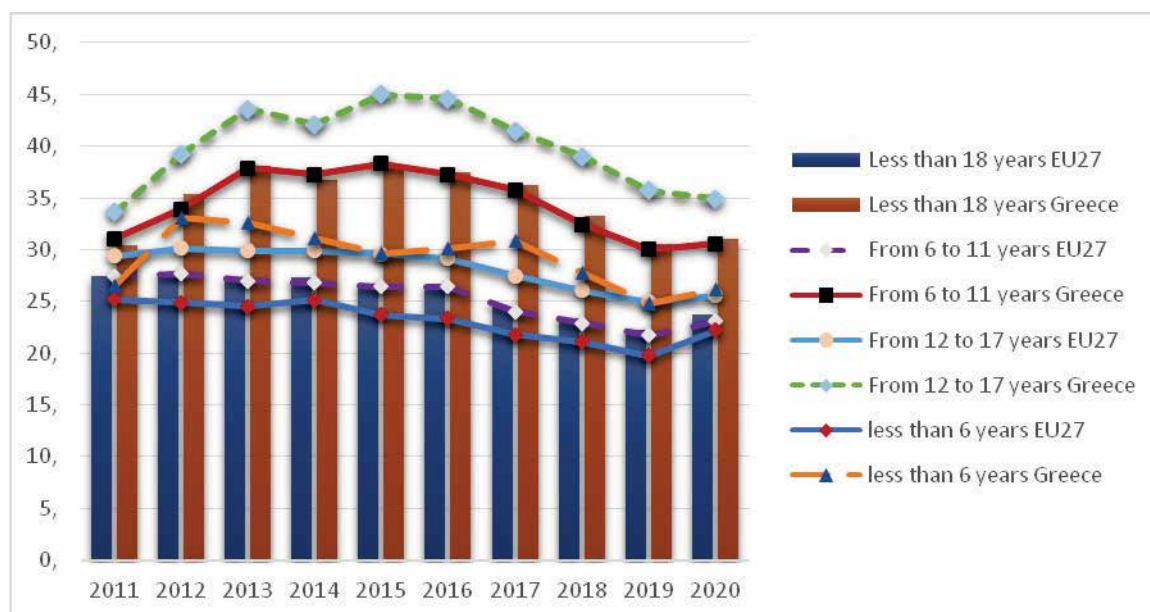
This finding confirms that children in single-parent (single person with dependent children) households or in large families (two or more adults with dependent children) are most at risk.

⁶ The indicator refers to income year t-1

⁷ ELSTAT published an amendment to 2020 figures noting a slight decrease at 24 percent, while the rate of children at risk of poverty was at 20.9%

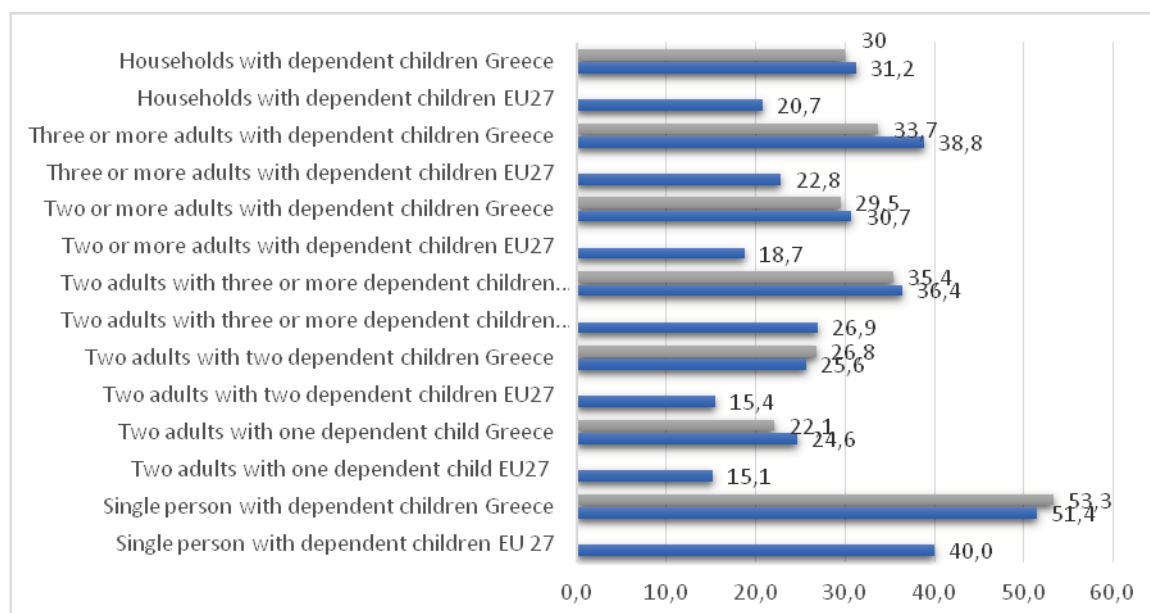
⁸ Data for 2020 are not available for all Member States.

Figure 9 Share of children at risk of poverty analyzed by age groups: 0-6 years; 6-11 years, 12-17 years and less than 18 years, Greece and the EU-27*, 2010-2020



*EU-27 data for year 2019 / Source: Eurostat. Authors elaboration from EU-SILC, (ILC_PEPS03)

Figure 10 Share of the population at risk of poverty, analyzed by selected household type with children, Greece and EU-27, 2019



*EU-27 data for year 2019 / Source: Eurostat. Authors elaboration from EU-SILC, (ILC_PEPS03)

1.1 The dispersion around the threshold and persistent poverty (secondary indicators) and persistent at-risk- of- poverty

The Indicators Sub-Group (ISG) of the Social Protection Committee (SPC) recommends that the relative income poverty measure and the child poverty indicators should include:

- ❑ At-risk-of-poverty rates at different thresholds (50%, 60% and 70% of the national median equivalized household income);
- ❑ The persistent at-risk-of-poverty rate.

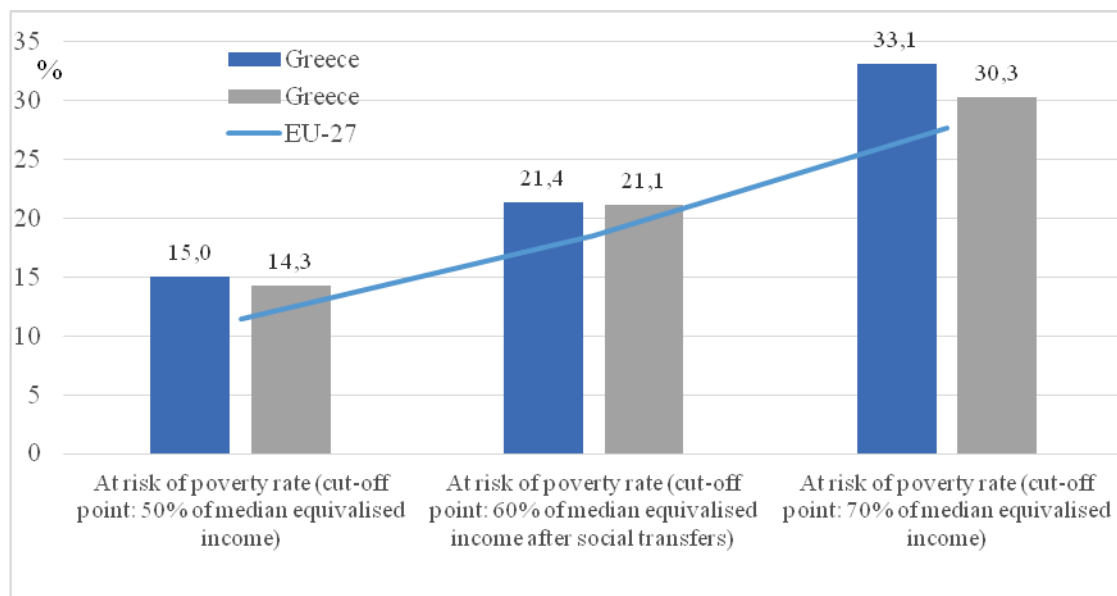
1.1.1. At-risk-of-poverty rates at different thresholds

The threshold set at 60% of the national median equivalized income provides information on relative levels of income, below which a person is considered to have a low income compared to the whole population. In EU Member States with high living standards (e.g., Denmark, Finland or Luxembourg), having an income below the threshold does not necessarily mean having a very low standard of living in absolute terms. Moreover, although the EU publishes estimates of the monetary value of the poverty threshold in Purchasing Power Parity standards (PPPs) this report uses the threshold based on euros as we think that it illuminates the situation better, given Greece's unique circumstances.

Figure 11 shows that in Greece the percentage of children who get by with less than 50% of the median equivalized income slightly increased from 2019 to 2020. Also, a commensurate increase of children above but close to the conventional poverty line (poor at 70% threshold) is recorded during 2019-2020 (from 30.3% in 2019 increases to 33.1% in 2020). It thus becomes evident that between 2019 and 2020 many non-poor children (cut-off point: 70% of median equivalized income) have moved closer to the conventional poverty line (cut-off point: 60% of median equivalized income).

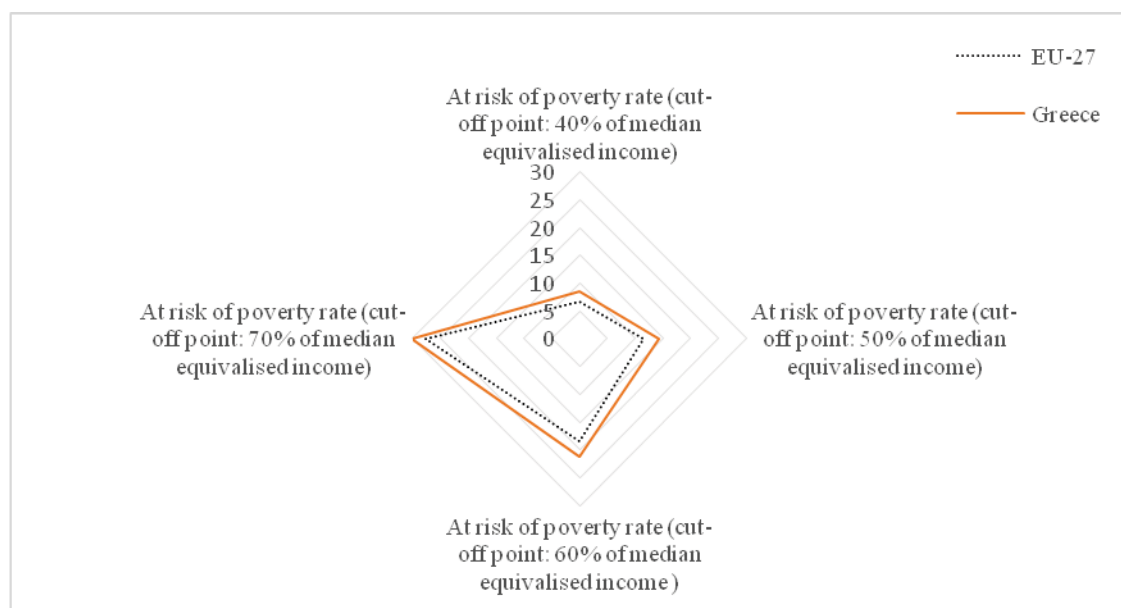
Note that the difference between the rates at 50% and 70% shows how many people are concentrated just below or just above the poverty indicator of 60%. In Greece, for example, relatively more children are clustered around the 60% threshold, in contrast to the EU average, where less children have an income just above or just below the threshold of 60% (Figure 11 and Figure 12).

Figure 11 Share of the children (less than 18 years) at risk of poverty at different thresholds, Greece and EU-27, 2019 and 2020*



*Year 2020 for Greece / Source: Eurostat. Authors elaboration from EU-SILC, (ILC_LI02)

Figure 12 Share of the children (less than 18 years) at risk of poverty at different thresholds, Greece and EU-27, 2019



Source: Eurostat. Authors elaboration from EU-SILC, (ILC_LI02)

1.2 The persistent child poverty

The *persistent poor indicator* shows the percentage of the population or the children whose equivalized disposable income was below the ‘at-risk-of-poverty threshold’ for the current year and at least 2 out of the preceding 3 years. Thus, this indicator captures those members of society who are particularly vulnerable to the persistent risk of poverty over relatively lengthy periods of time. The rationale behind this indicator is based on the fact that the chances for a household to recover or be lifted out of poverty fall the longer it remains below the at risk of poverty threshold (Eurostat, 2018).⁹ This is of interest to the extent that it allows a longitudinal analysis of whether the risk of poverty is transitory in nature (shared among various members of society) or whether it is a more structural phenomenon (whereby only a low percentage are to be persistently poor).

In 2020, the risk rate for persistent child poverty (less than 18 years) in Greece was 14.0%,¹⁰ which, despite having increased only slightly since 2019 (13.8%), remains worrying. The fact is that the “typical trend” continues to be observed and Greece show higher rates than the EU- 27 average both for child poverty indices¹¹ and for the total population, despite modest improvements in 2020 (Figure 13).

⁹https://eclass.unipi.gr/modules/document/file.php/SAE143/BOHΘHTIKA%20KEIMENA/eurostat_poverty.pdf

¹⁰ Equivalent to roughly 259,614 children.

¹¹ With the exception of year 2011.

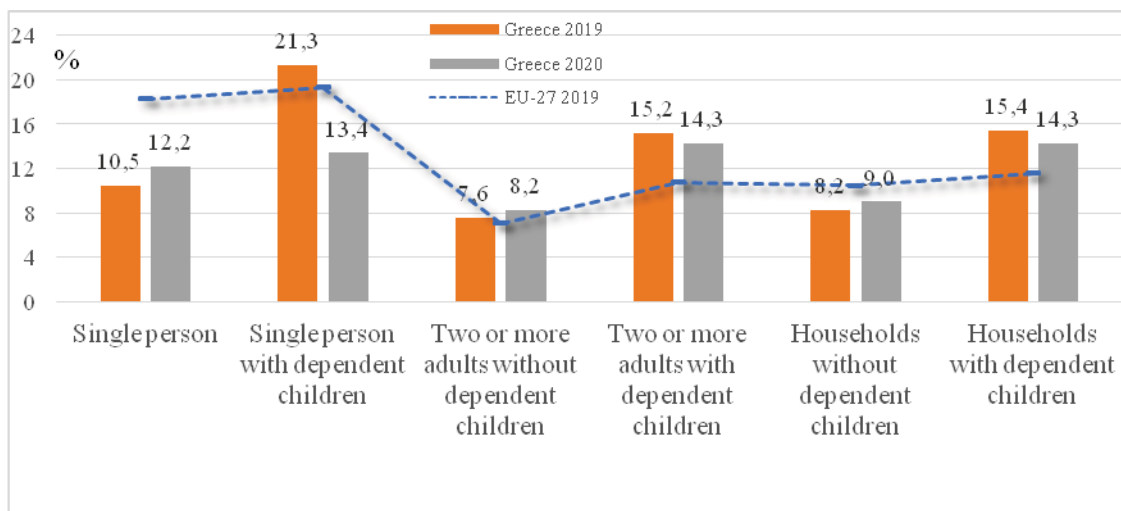
Figure 13 Share of total population and children (less than 18 years) at persistent risk of poverty by age in Greece and the EU-27, 2010-2020*



*Year 2020 for Greece / Source: Eurostat. Authors elaboration from EU-SILC, ([ilc_LI21](#))

It is obvious that some groups are more likely to be in persistent poverty than others. In particular lone parents are much more likely to experience persistent poverty than other groups. The presence of dependent children is of significance as the rate is higher in comparison with similar households without children (Figure 14).

Figure 14 Share of total population and children (less than 18 years) at persistent risk of poverty rate by selected household type, Greece and the EU-27, 2019/2020*



*Year 2020 for Greece / Source: Eurostat. Authors elaboration from EU-SILC, ([ilc_li23](#))

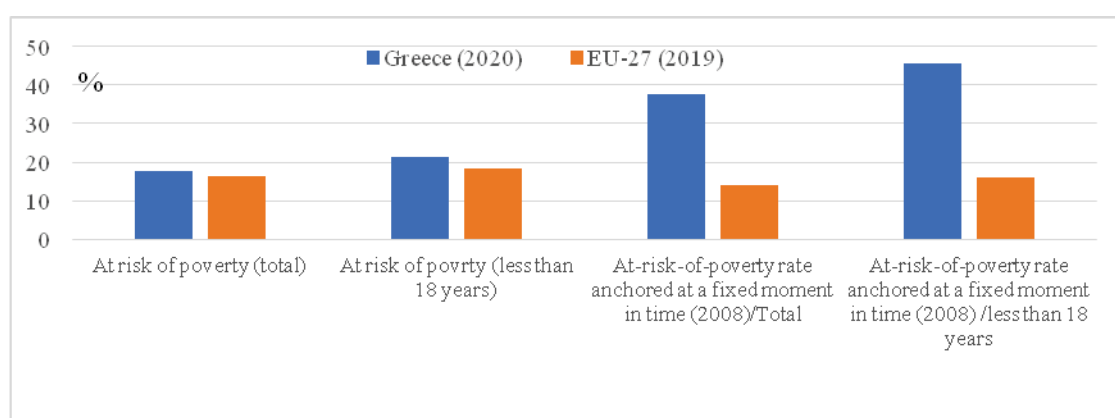
1.3 At-risk-of-poverty rate anchored at a fixed moment in time (2008)

Given that the at-risk-of-poverty rate is calculated on the basis of poverty thresholds that change from one year to the next, a more appropriate measure for examining developments over time is the at-risk-of-poverty rate anchored at a specific point in time. It supplements the conventional relative poverty indicators, as it brings some of the strengths of absolute poverty measures discussed earlier. The measure is

obtained using the at-risk-of-poverty threshold in a particular year, adjusted for inflation during the following years. Comparison of changes in this measure with those in the “conventional” at-risk-of-poverty rate gives an indication of changes in the absolute situation of those with low incomes in relation to changes in the relative situation.

The EU-SILC data indicate (Figure 15) that in 2020 keeping the poverty threshold at the 2008 level in terms of real income, the risk of poverty for children (less than 18 years) in Greece is higher than the respective rate for the total population (45.6% vs 37.8%). **It is obvious that this high rate for children exceeds significantly both rates based on the conventional poverty line.**

Figure 15 At-risk-of-poverty rate anchored at a fixed moment in time (2008) compared with the conventional at-risk of poverty rate total population and children (less than 18 years), at the EU-27 2019 and Greece, 2020



Source: Eurostat. Authors elaboration from EU-SILC, (ilc_li22b)

2.1 Work intensity and in work poverty

The problem of poverty amongst working families has been the subject of increasing attention in recent years in Greece, particularly during the financial crisis period. In-work poverty occurs when a working household’s total net income is insufficient to meet their needs and fluctuates below the poverty line. Thus, low pay is one possible reason for in-work poverty occurring, but we must consider the circumstances of the whole household and not just the person in paid employment.

Many scholars argue that there are three mechanisms that explain in-work poverty: (i) job quality (remuneration levels), (ii) job quantity (labour market participation of household members, and (iii) household size and more precise household composition (number of dependents). There have been attempts to identify the relative contributions of these three mechanisms, and these have generally argued that low work intensity is the primary mechanism explaining in work poverty.¹² Nevertheless, EUROSTAT states that “*changes in the approach to workers also lead to changes in the household characteristics of workers at risk of poverty. This is due*

¹² Hick and Lanau (2017) IN-WORK POVERTY IN THE UK: Problem, policy analysis and platform for action accessed at: https://www.cardiff.ac.uk/data/assets/pdf_file/0009/758169/Hick-and-Lanau-In-work-poverty-in-the-UK.pdf

to various composition effects (distribution of unemployment by age group, women's participation in employment, part-time, and general household structure) that only detailed monographs could account for. However, we can at least look at its impact on household type, especially its economic composition".¹³

For this part of the analysis, the following indicators were used:

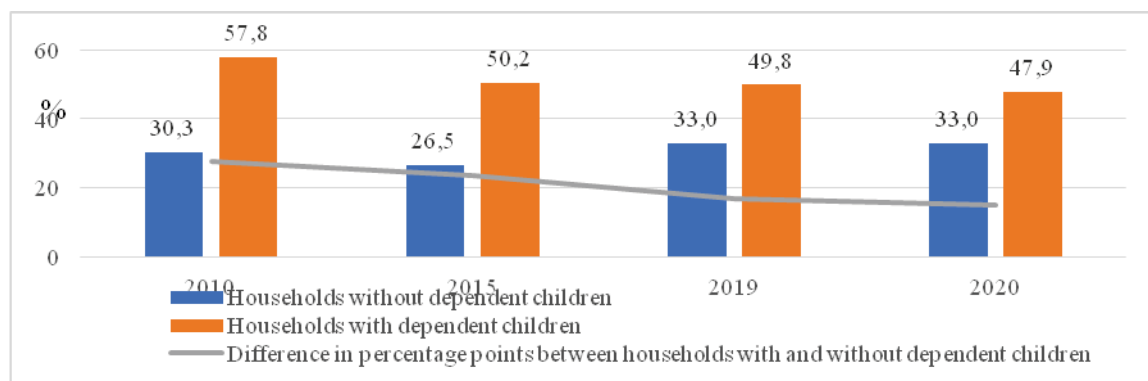
- In-work poverty rate of people living in households with dependent children;
- At-risk-of-poverty rate for children by work intensity of the household.

Parallel with these indicators, the Project Team examined the sex difference in employment, between those with or without children.

Data from Figure 16 show that in-work at-risk-of-poverty rate for households with low work intensity is differentiated between household with and without dependent children in Greece. During the period 2010, 2015 and 2020, households with dependent children are worst of than households without dependent children, although the difference between the two rates has been decreased from 27.5 percentage points in 2010 to 14.9 percentage points in 2020.

Data from Figure 17 show that in work poverty for single person with dependent children in Greece was a serious problem in 2010 (21.2%) which has been decreased in 2020 (11.2%). All in all, the data shows that workers 'in-work at risk of poverty' living in a household with children tend to be over-represented in Greece, but this is expressly noticeable for those who are single parents and the only worker in their family. **This suggests that single persons with dependent children are not able to obtain the quantity of work that would obviate the risk of poverty, while in the case of two or more adults with dependent children, it is rather the quantity of work of the other adult/s (i.e., the worker's partner) that probably is at issue.** The second high poverty rates are actually found among the household category "Two or more adults with dependent children".

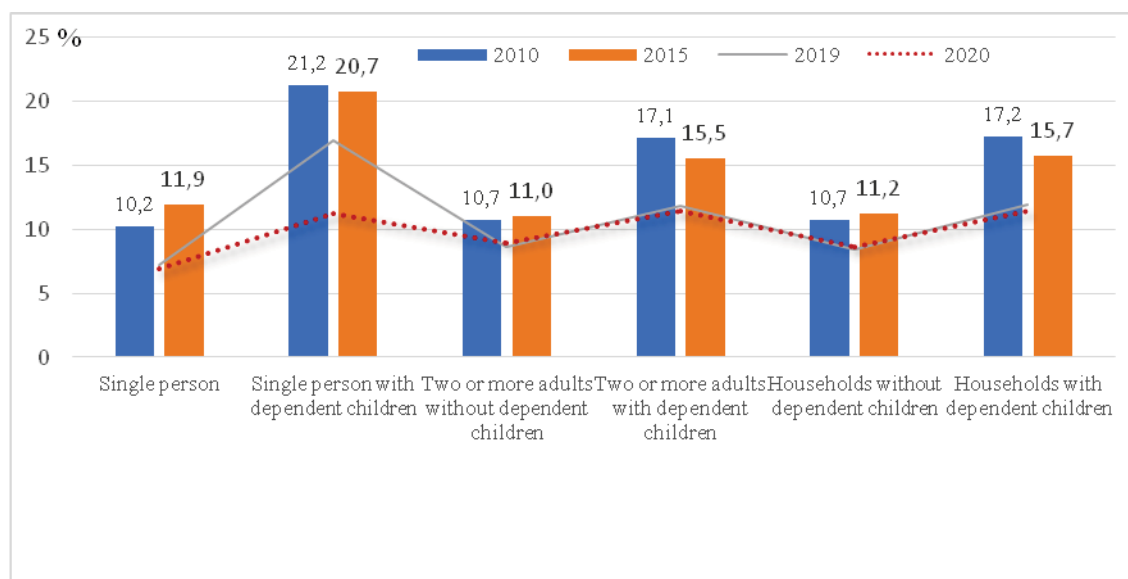
Figure 16 In-work at-risk-of-poverty rate of households with and without children, by low work intensity of the household (population aged 18 to 59 years), Greece 2010,2015, 2019, 2020



Source: Eurostat. Authors elaboration from EU-SILC, (ILC_IW03)

¹³ See: <https://ec.europa.eu/eurostat/documents/3888793/5848841/KS-RA-10-015-EN.PDF/703e611c-3770-4540-af7c-bdd01e403036>.

Figure 17 In-work at-risk-of-poverty rate by household type, Greece 2010, 2015, 2019, 2020



Source: Eurostat. Authors elaboration from EU-SILC, (ILC_IW02)

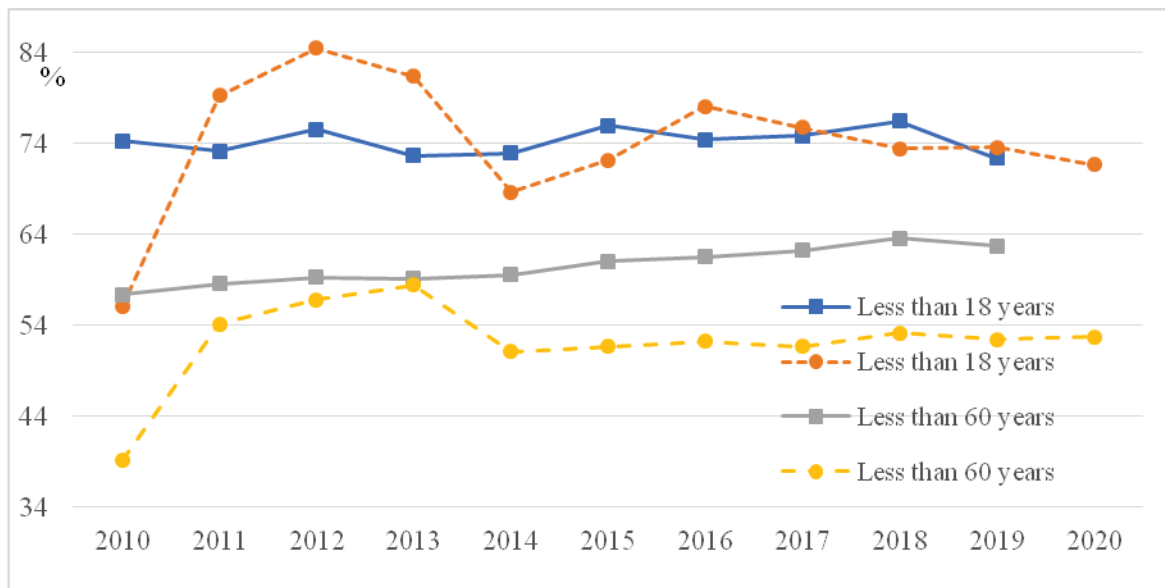
The data in Figure 18 show the risk of poverty rate for children by work intensity of the household for persons below 60 years old and children less than 18 years for Greece and the EU-27. There is evidence that children suffer disproportionately compared with the population less than 60 years.

Whether or not a household or a person has children present in the household, affect significantly labour market participation. The number of children and the age of the youngest child influence furthermore the participation in the labour market. Figure 20 shows analytically these effects for both sexes. According to Eurostat, the data include only persons aged 25-49 years, so that different national situations for being a pupil, student and/or retired person do not influence the results and do not compromise the comparability between countries (Eurostat, 2020).¹⁴

In 2019, 1 in 3 women (aged 25-49 years) with children, worked on a part-time basis in the EU-27 (33.1 %). The share of part-timers differs greatly between men and women while the gender gap becomes even bigger when persons have children. In all countries examined the proportion of women with one or more children that are employed on a part-time basis is higher, compared to men. In Greece the respective differences were very moderate (the gap was 9.1 and 6.5 percentage points) depending on the fact that the proportion of part-time workers is relatively low and not well protected.

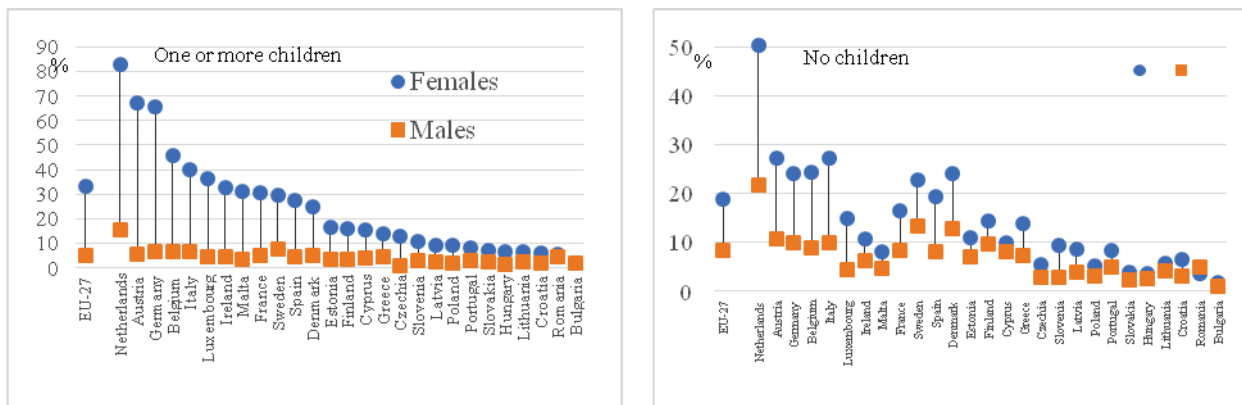
¹⁴https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Labour_market_and_household_statistics

Figure 18 At risk of poverty by very low work intensity of the household for children less than 18 years and persons less than 60 years, Greece and the EU-27, 2010-2019/2020*



* 2020 for Greece / Source: Eurostat. Authors elaboration from EU-SILC, (ilc_li06)

Figure 19 Gender gap in part-time employment in households with and without children, 2019 (% of employed aged 25-49 years)

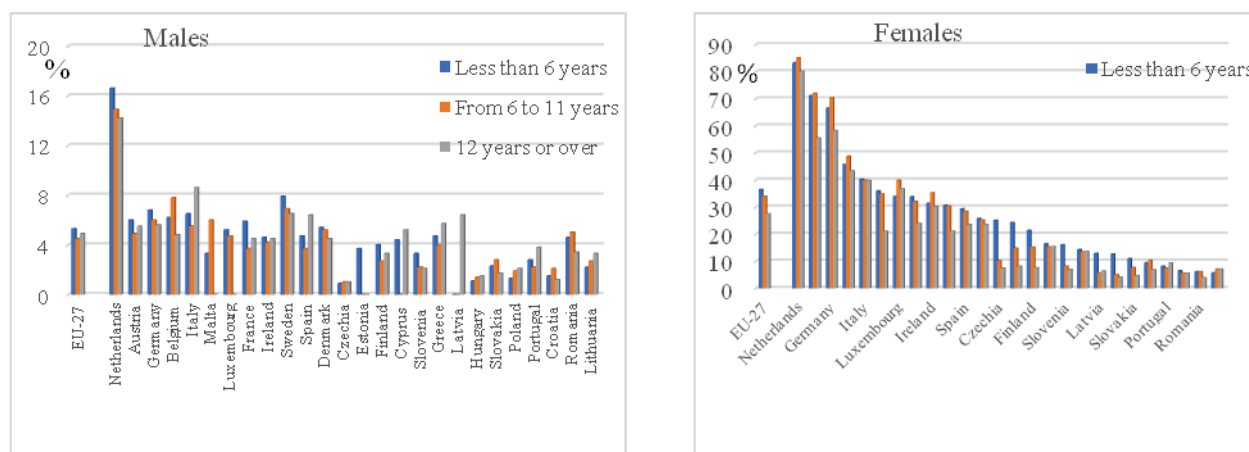


Source: Eurostat 2019

According to Eurostat (2020)¹⁵ the age of the youngest child affects the proportion of women working part-time. Concerning Greece, we find that about 14% of women (aged 25-49 years) in employment and having children, worked part-time in 2019: 14.5% for women with children less than 6 years, 13.5% % for women with children and 13.6% for women with children 12 years and over. The respective figures for men (aged 25-49 years) show that part-time employment rate is not affected by the age of the youngest child as it is always (with the exception of Netherlands) below 9 % in all EU Member States (Figure 20).

¹⁵https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Labour_market_and_household_statistics.

Figure 20 Gender gap in part-time employment by existence of children in the household, EU countries 2019 (% of employed aged 25-49 years)/ Males and Females



Source: Eurostat

https://ec.europa.eu/eurostat/statisticsexplained/index.php?title=Labour_market_and_household_statistics

The results so far show that household labour poverty can be explained by labour intensity which is expected to affect poverty significantly as it is strongly dependent on household characteristics and composition: fewer dependents (e.g., young children) affect mainly women’s part time employment in many countries. Other things equal, the labour market situation of parents is a key determinant of the conditions in which children live and grow up.

2.2 Unmet needs

Subjective poverty is the result of people’s views, perceptions, preferences or feelings about their situation or well-being. A subjective method completes the picture by giving a measure of economic well-being to respondents themselves¹⁶. It is operationalized in terms of economic strain within the EU –SILC survey. Respondents are asked to rate the degree of financial difficulty their household experiences in “making ends meet”, and households are identified here as subjectively poor if they report “great difficulty” in doing so.

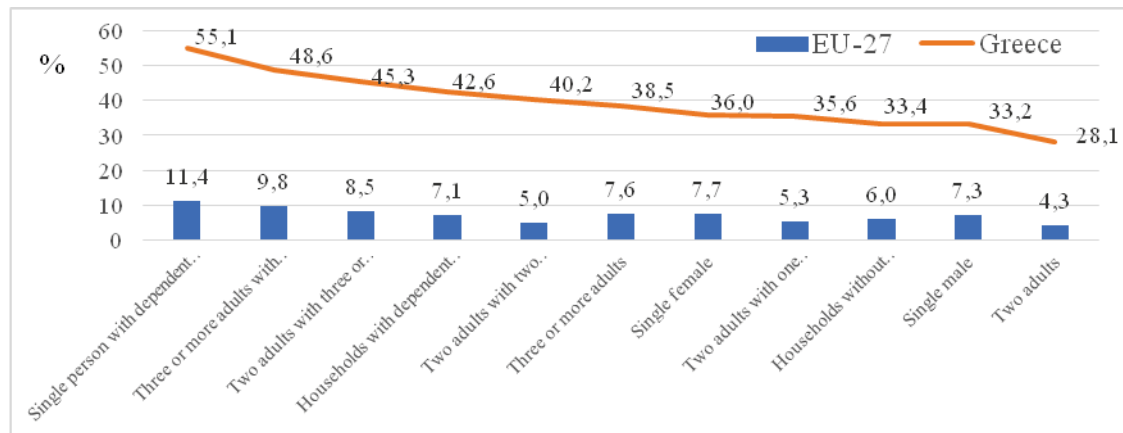
In EU-27 the rates of households making ends meet with great difficulty are low, compared with Greece. Specifically, only 11.4% of single person with dependent children make ends meet with great difficulty and 9.8% of large families in EU-27. In Greece the rates are almost five times higher (Figure 21). Half of single person with dependent children make ends meet with great difficulty. The rates are also high for large families/households (three or more adults with dependent children and two adults with three or more dependent children).

Thus, in effect, **the number of people who felt poor - in the sense that they report substantial difficulties in making ends meet - was high for certain**

¹⁶ Heikkilä et al. (2006), Poverty policies, structures and outcomes in the EU 25, Report to the Fifth European Round Table on Poverty and Social Exclusion

households categories and significantly higher than the respective categories with an income below the poverty threshold¹⁷.

Figure 21 Inability to make ends meet (households making ends meet with great difficulty) by household type, Greece and EU-27 (%), 2019



Source: Eurostat. Authors elaboration from EU-SILC, ([ilc_mdcs09](#))

2.3 Material deprivation

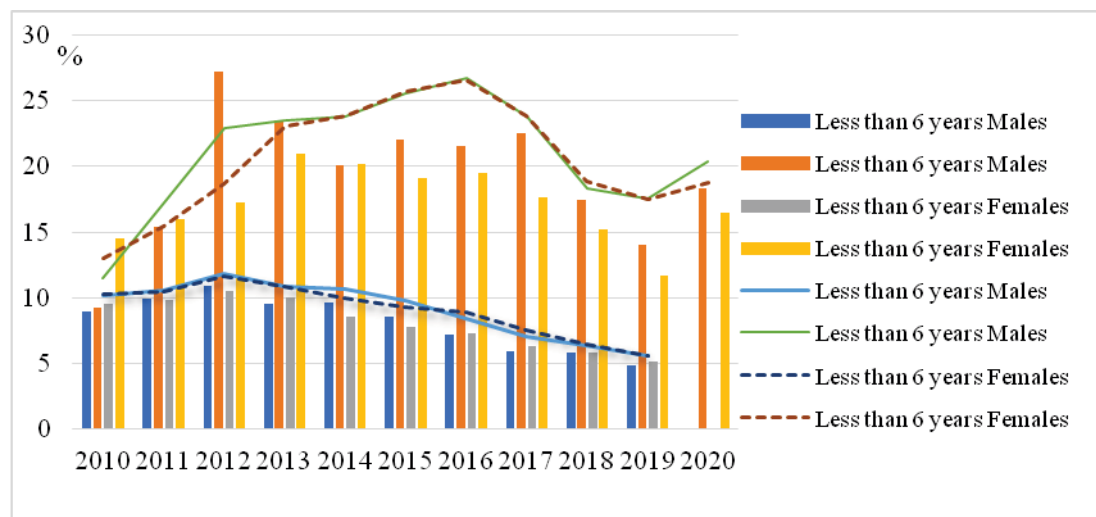
Severe material deprivation (SMD) is a composite indicator and a component of the AROPE indicator. It is based on the enforced lack or deprivation – i.e. the presence of four or more of the 9 deprivations (i.e. inability to: pay rent or utility bills; keep home adequately warm; face unexpected expenses; eat meat, fish or a protein equivalent every second day; take a week’s holiday away from home; have a car; have a washing machine; have a colour TV or have a telephone); However, this measure is not child-specific, and provides no clear explanations about children’s own experiences of poverty/deprivation.

Analysis points to Greece facing severe material deprivation rate (SMD) peaked for both sexes between 2011 and 2017, while noting more severe incidences of material deprivation for males.

Moreover, as shown in Figure 23, in EU-27 the rates of severe material deprivation regardless household type are low, compared to Greece. In specific, only 10.6% of single persons with dependent children make ends meet as opposed to over 30 percent in Greece for the same year.

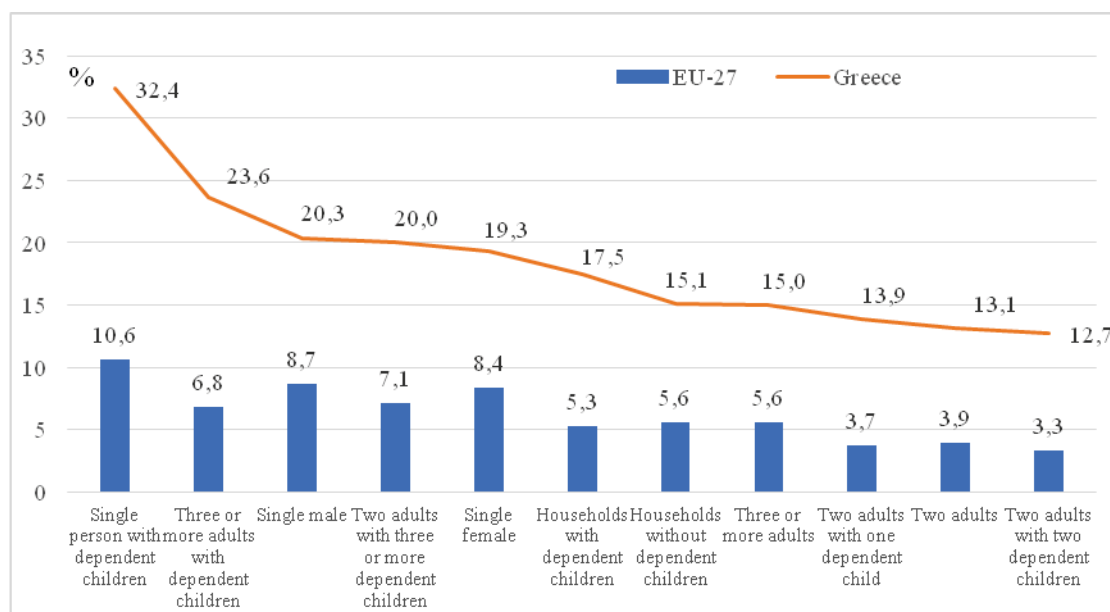
¹⁷ The answers to the two questions: “ability to make ends meet” refer to the year of the survey, while the at-risk-of-poverty estimate considers income in the previous year(s).

Figure 22 Severe material deprivation rate for children less than 6 years, by sex, Greece and EU-27 (%), 2010-2020



Source: Eurostat. Authors elaboration from EU-SILC, (ILC_MDDD11)

Figure 23 Severe material deprivation rate by household type, Greece and EU-27 (%), 2019



Source: Eurostat. Authors elaboration from EU-SILC, (ilc_mddd13)

2.4 The use of new indicators

The indicator ‘children at risk of poverty or social exclusion’ shows the number of children less than 18 affected by at least one of three forms of poverty:¹⁸ monetary poverty, material deprivation or low work intensity. Children can suffer from more than one dimension of poverty at a time. To calculate this composite indicator,

¹⁸ Also referred as sub-indicators.

children are counted only once even if they are present in more than one sub-indicator.

In 2021, the AROPE indicator has been modified. It allows to better measure deprivation including the new severe material and social deprivation rate (SMSD)¹⁹ and to better account for the social exclusion situation of those in the working age (aged 18 to 64 instead of 18 to 59).²⁰

Based on this, the level of the new AROPE indicator changes slightly but the ranking or the clustering of the countries as far as children are concerned remains more or less the same, with some exceptions as Romania for example, where the rate increases with more than 4 percentage points. More specifically, with the 'old' indicator Greece in 2019 was at the third place among the countries with the highest rates (Romania: 35.8%, Bulgaria: 34.1%, Greece: 30.5% and Spain 30.3%). Respectively, for the same year the estimates with the new definition place Greece at the fourth place.

Similar trends are observed when analysing the situation among the various age groups. Namely we find that those at the highest age group (12-17 years) are more likely to be at risk of poverty or social exclusion (36.9% in 2019) than children at the lowest ages, while those less than 6 years seem to be in a better position. (25.1% in 2019).

Examining the three components of the risk of poverty or social exclusion-new definition for children less than 18 years for Greece, we find that in 2019 the at risk of poverty for children (21.1%) is higher than the new severe material and social deprivation (18.2%), while child poverty or social exclusion (in constant 2015 levels) decreases steadily after 2016. This downward trend is more intensive for children less than 6 years while it moderates for children at the age group from 12 to 17 years (Figure 24).

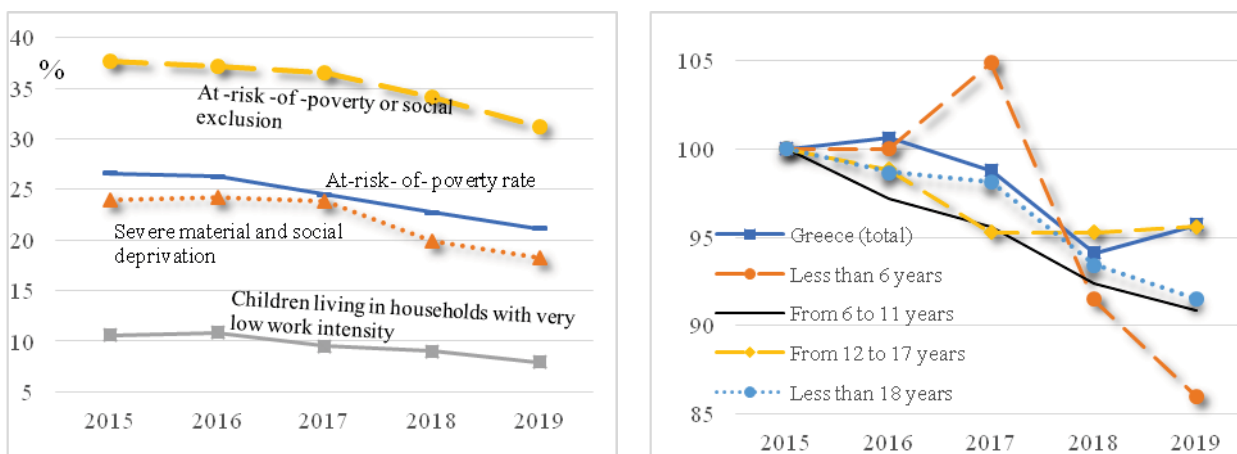
¹⁹ The severe material and social deprivation rate (SMSD) is defined as the proportion of the population experiencing an enforced lack of at least 7 out of 13 deprivation items (6 related to the individual and 7 related to the household).

The full list of items at household level include the following items: Capacity to face unexpected expenses; Capacity to afford paying for one week annual holiday away from home; Capacity to being confronted with payment arrears (on mortgage or rental payments, utility bills, hire purchase instalments or other loan payments); Capacity to afford a meal with meat, chicken, fish or vegetarian equivalent every second day; Ability to keep home adequately; Have access to a car/van for personal use; Replacing worn-out furniture. The full list of items at individual level: Having internet connection; Replacing worn-out clothes by some new ones; Having two pairs of properly fitting shoes (including a pair of all-weather shoes); Spending a small amount of money each week on him/herself; Having regular leisure activities; Getting together with friends/family for a drink/meal at least once a month.

²⁰ For more details see:

https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:Persons_living_in_households_with_low_work_intensity

Figure 24 Share of children aged less than 18 years at risk of poverty or social exclusion-new definition, and developments for child poverty or social exclusion indicators -new definition (index, 2015=100), Greece 2015-2019

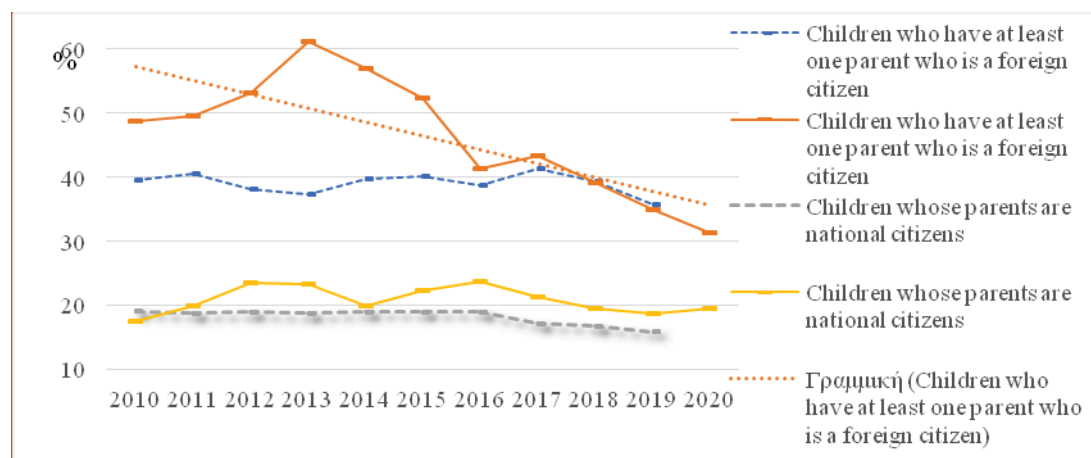


Source: Eurostat. Authors elaboration from EU-SILC, ([ilc_peps01n](#))

Migrant children

Across the EU-27, 15.9 % of children whose parents were national citizens were at risk of poverty in 2019, while this share was more than twice as high (35.8 %) for children who had at least one parent who was a foreign citizen. This pattern - a higher share among children with at least one parent who was a foreign citizen - was also observed in Greece although at different levels. Namely, in 2020, 19.5% of those whose parents were national citizens were at risk of poverty, while it increased to 31.3% for children who had at least one parent who was a foreign citizen (Figure 25).

Figure 25 Children aged 0-17 years at risk of poverty, by citizenship of their parents, Greece and EU-27* 2010-2020



*EU-27 for the period 2010-2019 / Source: Eurostat. Authors elaboration from EU-SILC, ([ilc_li33](#))

B. Institutional Challenges

Institutional framework and child sensitive poverty measures

The institutional framework in Greece measures and addresses child poverty with **the legally binding framework of eligibility conditions**²¹ which families should satisfy to access social benefits and services provided through disparate public policies. It thus applies an income threshold applicable to all and may inadvertently fail to take into account the multidimensional aspects of poverty.

The relevant policies can be broadly categorized as follows:

- policies to combat extreme or relative income poverty
- policies to address risks related to family costs;
- policies to promote access to basic services (early childhood education and care, education, healthcare, nutrition, and housing).

In this respect, **the context of child poverty is regulated in principle by the social welfare legislation** and is linked *de jure* with the eligibility conditions to enrol either in the *Guaranteed Minimum Income Scheme (GMIS)*²² or in other supplementary programmes.

The introduction of the Guaranteed Minimum Income Scheme (GMIS) into the Greek social protection system, was a key policy to bridge the regulatory and policy gaps in addressing poverty and social exclusion. The GMIS, to a large extent addressed some of the challenges embedded in the welfare mix in Greece such as its fragmented character, the absence of concrete monitoring and evaluation mechanisms, the limited number of programmes addressing poverty and the limited coverage.

The GMIS was first adopted in 2012 as a pilot programme and was implemented in 2014 in 13 municipalities across Greece.²³ Then, and after a series of retrogressions regarding the implementation of the programme³ started in 2016 and since February 2017 operates at full national scale. Beneficiaries must be legal and permanent residents in Greece. It should be noted however that in contrast with the European experience, GMI has not been an add on programme to an already formed

²¹ Amitsis, G. (2017): *The social clauses of the Economic Adjustment Programmes for Greece: A controversial paradigm for experimental policy-making in the welfare domain* [Paper presentation]. 3rd International Conference on Public Policy - International Public Policy Association, 28-30 June 2017, Singapore, www.ipppublicpolicy.org/file/.../593c2f7db1b16.pdf. Amitsis, G. (2017a): 'State pensions, poverty and social inclusion during austerity times - The paradigm of Greece', in B. Searle (ed.), *Generational interdependencies - The social implications for welfare*, Vernon Press, London, pp. 159-183. Amitsis, G. (2021): 'Greece Country Profile', in Housing Europe, *The state of Housing in Europe in 2021*, Brussels, <https://www.housingeurope.eu/resource-1540/the-state-of-housing-in-europe-in-2021>. Amitsis, G. and Marini, F. (2021): *The regulation of care poverty in rudimentary welfare regimes - The Greek approach to care for vulnerable groups* [Paper presentation]. 5th Transforming Care Conference, 'Time in Care: The Temporality of Care Policy and Practices', 26 June 2021, Venice, ["The regulation of care poverty in rudimentary wel - 291 Kb - pdf"](#)

²² This is a national social welfare scheme regulated by legislation and normative administrative acts, which provides access to means-tested income support, basic social services and active employment measures to individuals and families at risk of extreme poverty irrespective of their employment status. Its nationwide implementation started in February 2017 in accordance with art. 235 of the *Law No. 4839/2016*, which forms until today the legal framework of the GMIS (the controversial term "*Social Solidarity Income*" was replaced by "*Guaranteed Minimum Income*" only in February 2020 by art. 21 of the *Law No. 4659/2020*

²³ See Annex for full details

social safety net: as in the Greek case, such a safety net was absent. Thus, GMI, constitutes the main safety net in addition to which, other policies are applied incrementally as needed.

The current *GMIS* eligibility conditions (material scope of application) include the income level and the property size of applicants. In addition, there are also conditions related to (a) the households' deposits; (b) the households' interest from deposits; (c) the objective value of the households' vehicles. It should be noted that the declared income of the household should not exceed the past six months the total expected income from the GMIS in six months, subject to different thresholds according to the household type. In addition, the total tax-value property should not be over 90,000 € per person (increased by 15,000 € for each additional adult and 10,000 € for each dependent child) while the maximum amount for the household should not be more than 150,000 €. Finally, the household must not be categorized in the "luxury tax" category.

The amount of the benefit varies according to the category that the beneficiary falls and the household structure. Thus, for a single person household the guaranteed amount is defined at 200€ monthly. For every additional member of the household there is a monthly increment of 100€. Regarding the minor members of the household the monthly increment is 50€ for each one of them. GMIS is entirely funded by the state budget. For 2020 the annual expenditure was 674.031.923€ and the beneficiaries were 257.452 households. About 50% of the households included in the programme as of June 2021 had zero income while about 20% had an annual income between 1€ and 500€.

The statistical portrait of GMIS in June 2021

- ❑ Total number of beneficiary households: 284.374
- ❑ Households with minors: 86.433 (30,39% of the households)
- ❑ **Number of children that receive the benefit: 158.759**
 - **0-4 years: 32.454**
 - **5-9 years: 45.247**
 - **10-14 years: 47.371**
 - **15-19 years: 43.834**
- ❑ **Third country nationals:** 50.685 (17,82% of the households)
- ❑ **Single parent households: 19.628** (6,90% of the total)
- ❑ Number of households beneficiaries of the TEVA FEAD: 221.825 (78% of the total)
- ❑ **Number of households with a disability member:** 10.497 (3,69% of the total)
- ❑ **Homeless households:** 4.959 (1,74% of the total)

Source: Project Team analysis of beneficiaries' public registries, 2020

GMIS children beneficiaries (158.759) are by far less than the EU-SILC defined children at risk of poverty before social transfers (766.413). Apart of take up rate problems, the key issue here is the scope and the objectives of the current regulatory process to identify children in need.

Table 1 The financial situation of GMI beneficiary households in June 2021

Annual household income of GMI beneficiaries		
	Number	%
Zero income	143.286	50,39%
Income between 1€ and 500€	54.642	19,21%
Income between 501€ and 1.000€	34.258	12,05%
Income between 1.001€ and 2.000€	36.381	12,79%
Income between 2.001€ and 5.000€	15.775	5,55%
Income above 5.000€	32	0,01%

Source: Organization for Welfare Benefits and Social Solidarity - OPEKA

NIWA research team, public registries 2021

GMIS is an extreme poverty focused policy. This means that **children living in families at risk of relative poverty**, whose annual income is a) over the GMIS annual income thresholds (4.800 € for two adult and two children household) and b) below the EU-SILC annual income thresholds (11.059 € for two adult and two children under 14 years of age household)} **may be classified as children at risk of poverty according to the EU SILC, but they are not entitled to enroll in the GMIS.**

In addition to the sectoral policies/ programmes implemented to support access to a specific service which are thoroughly analyzed in the following chapters, additional policies/ programmes to combat extreme or relative income poverty of families with children are: the Benefit for families living in deprived and mountainous areas while child specific benefit policies/ programmes are the Child Benefit and the Birth Grant. Below there are some basic elements of these benefit policies/ programmes and a more detailed outline is presented in annexes 1, 2, 3 and 4 where also categorical income transfer programmes for families with disabled children are included.

The **Benefit for families living in deprived and mountainous areas** provides modest income transfers to a limited number of families living in mountainous and less favoured areas, as defined in relevant EU directives and regulations. It is implemented and monitored by the MoLSA. Eligible are families, including single parent families, that are Greek Citizens, citizens of EU member states and EFTA countries that reside legally in Greece. In order for the family to be eligible it suffices one of the two parents to fall in one of these categories. It has to be stressed the fact that the existence of family is a crucial element for the provision of the allowance. In addition, their (real or imputed) annual income should not exceed 4.700€. The subsidy falls into two categories. For families that their annual income is below 3.000€, the subsidy is 600€. For families that their annual income is from 3.001 to 4.700€, the amount of the subsidy is 300€. The subsidy is provided once per

year. The programme is funded by the state budget. The cost for the year 2020 was 1.702.200€ and the number of the beneficiaries was 3.433 families.

The Child Benefit is a scheme that covers households with dependent children through financial support. The scheme targets families at risk of extreme and relative poverty, while favourable clauses are applied in case of children with a disability. However, families at risk of extreme poverty may only receive a maximum annual amount of is 840 EUR per year per child, in case of families with 1 or 2 children, 1120 EUR per year per child in case of families with 3 children etc. It is implemented and monitored by MoLSA. Eligible are claimants who reside legally and permanently in Greece. Thus, beneficiaries may be Greek citizens that reside permanently in Greece, citizens of other EU member states as well as citizens of the countries that belong to the EFTA countries and reside permanently in Greece. Moreover, beneficiaries may be refugees, stateless persons, beneficiaries of subsidiary protection. For all these categories there is a precondition to live permanently in Greece for five years, at least. Eligible are also third country nationals. For them, the permanent residency should be at least twelve years (art. 5 of the *Law No. 4659/2020*). The child benefit is granted taken into account the number of dependent children, the equivalent family income and the category of equivalent family income. Depending on the number of dependent children and the category of the equivalent family income, the amount of the subsidy is specified. The scheme is financed by the State Budget and in 2020 888,341 dependent children were supported.

The Birth Grant is a scheme that covers mothers through financial support and its aim is to motivate couples in order to have children; in this respect, this is not a policy against child poverty and social exclusion, yet, it provides a substantial amount to poor families with children, particularly to address costs during the first stages of their children upbringing. *The programme* was introduced in 2020 and it is implemented and monitored by MoLSA. It is a lump-sum benefit of 2000 euros and is given for every child born in Greece, whereas eligible are claimants who reside legally and permanently in Greece. Thus, beneficiaries may be Greek citizens that reside permanently in Greece, citizens of other EU member states as well as citizens of the countries that belong to the EFTA countries and reside permanently in Greece. Moreover, beneficiaries may be refugees, stateless persons, beneficiaries of subsidiary protection. For all these categories there is a precondition to live permanently in Greece for five years, at least. Eligible are also third country nationals. For them, the permanent residency should be at least twelve years (art. 5 of the *Law No. 4659/2020*). Exceptionally, for children born in Greece during the years 2020, 2021, 2022 and 2023, the allowance is granted as long as their mother, as a third –country national, resides permanently in the country from the year 2012 onwards. Entitled for the grant is the mother of the child. In case the mother passes away or in case she abandons the child, the allowance is granted to the one that has the child's custody. There is an income criterion in order for the grant to be given. That is, for someone to be eligible the equivalent family income should not exceed the amount of 40.000€. The amount of the grant is 2.000€ and it is paid in two installments of 1.000€. The scheme is financed by the State Budget; the total amount for 2020 was 109.864.000 € while the total number of beneficiaries for 2020 was 66.064.

Table two presents the actual number of children in Greece who receive cash benefits and benefits in kind through programmes to combat extreme or relative income poverty

Table 2 The number of children in receipt of welfare benefits in Greece

Programme	Number of beneficiaries
GMIS	158.759 children (2021)
TEVA FEAD	107.518 children (total number)
Digital Support	258.992 children (2021)
Housing Benefit	126.067 families with children (2020)
Income Subsidy to Support Families in Mountainous and Less Favoured Areas	3.433 families with children (2020)
Child Benefit first category	680.793 children (2020)
Disability benefits	31.894 children (2020)

Notes: GMIS is the Guaranteed Minimum Income Scheme; TEVA FEAD is the Operational Programme “Food and/or Basic Material Assistance”, supported by the Fund for European Aid to the Most Deprived.

Source: UNIWA analysis of beneficiaries’ public registries, 2020 and 2021.

In addition, **the analysis highlights a rather complex picture of migrant AROPE children with regard to their access to social security benefits.** Article 1 of *Law No. 4387/2016* recognizes the general right to social benefits for Greek citizens and foreigners legally and permanently residing in Greece.²⁴ Also, the *Code of Immigration and Social Integration*²⁵ makes clear that legally residing non-EU immigrants have the same rights as nationals in social insurance, whereas single residence permit holders are entitled to equal treatment with nationals regarding their access to social security schemes.²⁶ The general right to equal treatment with nationals is also recognized to EU nationals and their family members residing in Greece according to the *Presidential Decree (P.D.) No. 106/2007*.²⁷

However, **eligibility conditions for child poverty related social welfare benefits and services differ according to the type of the scheme / programme into**

²⁴ Amitsis, G. (2017a): ‘State pensions, poverty and social inclusion during austerity times - The paradigm of Greece’, in B. Searle (ed.), *Generational interdependencies - The social implications for welfare*, Vernon Press, London, pp. 159-183

²⁵ *Law No. 4251/2014* regulates all issues regarding the entrance and residence of third-country nationals in Greece and transposes *Directives 2011/98/EU* and *2009/50/EU*. It was amended by *Law No. 4332/2015*.

²⁶ Social security is defined here with specific reference to *Regulation (EC) 883/2004*.

²⁷ This P.D. regulates the entrance and residence of EU nationals and their family members, transposing *Directive 2004/38/EC*. It was amended by *Laws No. 4071/2012* and *No. 4540/2018*.

question,²⁸ thus potentially having a different impact on the ability of national residents, non-national residents and non-resident nationals to enjoy them (see **Table 3**). Access to social welfare benefits (non-contributory), subject to subsidiarity and needs assessment principles, may also depend on *prior residence requirements*.²⁹

The term "*permanent residence*"³⁰ means that a person has actually settled in Greece and that Greece is the centre of his/her existence, biotic relationships, material interests, and material life, as well as his/her professional place of establishment. Furthermore, the person in question must be willing to remain in Greece for a reasonable period of time.

Among other things, the factors taken into account in order to establish whether a person is a permanent resident are the following:

- the person in question must reside in his/her primary and permanent place of residence;
- s/he must not have more than one permanent residence;
- if proof cannot be provided of the person's last residence, then his/her place of residence is considered as his residence.

Table 3 Access of foreign children to key social benefits

Title of benefit	Legal type of benefit	Residence test
Guaranteed Minimum Income benefit	Social welfare means - tested	Yes – no definition of <i>prior residence</i> period
Child Benefit	Family benefit affluence-tested	5 years of <i>permanent, uninterrupted and legal stay</i> in Greece (EU citizens, refugees, stateless persons, beneficiaries of subsidiary protection) 12 years of <i>permanent stay</i> in Greece (third country nationals)
Birth Grant	Family benefit affluence-tested	12 years of <i>legal permanent stay</i> in Greece (exceptionally for the births that will take place in the years 2020-2023 the allowance will be granted to the mother – third country national, if she has been permanently residing in Greece since 2012)
Housing Subsidy	Social welfare means - tested	5 years of <i>permanent, uninterrupted and legal stay</i> in Greece (EU citizens, refugees, stateless persons, beneficiaries of subsidiary protection) 12 years of <i>permanent stay</i> in Greece (third country nationals)
Disability benefits	Social welfare non means - tested	Yes – no definition of <i>prior residence</i> period

Source: UNIWA based of national legislation, 2021.

²⁸ Marini, F. (2020): 'Migrants' Access to Social Protection in Greece', in J. Lafleur & D. Vintila (eds.), *Migration and Social Protection in Europe and Beyond*, Vol. 1, pp. 195-209, IMISCOE Research Series, Springer, Bonn, https://doi.org/10.1007/978-3-030-51241-5_13

²⁹ A person must permanently reside in Greece when applying for the family benefit. This condition applies to all applicants, including Greek citizens.

³⁰ It does not apply to asylum seekers.

The Project Team used the results of the most recent *2020 Survey on Income and Living Conditions* (income reference period: 2019)³¹ to identify key aspects of the AROPE children who live in Greece. Relevant findings are summarized in the **Table 4** and codified in the **Annex III** of this Report.

Table 4 Key aspects of the AROPE children who live in Greece (2019)

Category	Number and / or percentage (% of the total population of children)	Breakdowns	Reference Period and Source
Children at risk of poverty or social exclusion	531.000 (31%)	Children aged less than 6 years: 120.000 Children aged 6-11 years: 85.000 Children aged 12-17 years: 226.000	2020, EU-SILC 2020
Children at risk of poverty before social transfers	766.413 (36,1%)		2020, EU-SILC 2020
Children at risk of poverty after social transfers	444.478 (21,4%)		2020, EU-SILC 2020

Source: UNIWA calculations based on ELSTAT, 2021.

³¹ ELSTAT (2020), Material deprivation and living conditions, Survey on Income and Living Conditions (SILK)

C. Key Conclusions

- **Children in Greece had a higher risk of poverty or social exclusion than working-aged adults or the total population.** Children who had at least one parent who was a foreign citizen faced twice as much higher risk.
- **Almost 31 per cent of children (less than 18 years) in Greece lived in households experiencing poverty or social exclusion,** while it was slightly higher for males (33%) and somewhat lower for females (28.9%).
- **Household structure has been changing in Greece, with implications for the extent and the depth of child poverty.** Generally, children in lone-parent (single person with dependent children) households or in large families (two or more adults with dependent children) are most at risk. Children in single-parent families have the highest risk of poverty by household type in the EU-27 (31.3% in 2019).
- The risk for those children is higher than that of children living in two-parent families with three or more dependent children (large families) (23.2% in 2019). Relying on household-level poverty analysis alone may neglect intra-household allocations leading to child deprivations and may leave unaccounted children suffering material shortcomings in non-poor households. Consequently, while the data on household poverty provides significant information concerning the situation of children, it **does not give us the full picture of the puzzle, particularly for a high-income country like Greece.** It is not sufficient to understand the experience of children living in poverty.
- **The risk of poverty in Greece increases with the age of the child.** For the period 2010-2020 the incidence is highest among children aged 12–17 years. Specifically in 2020, among children aged 12–17 the incidence of poverty is 24.4%, which is 38% higher compared with total population which was 17.7%.

As the analysis above shows, income threshold alone is not sufficient to capture what it means for a child to be poor. Child poverty often becomes invisible in non-poor households, or households with many dependent children, households with precarious working conditions, etc.

To sum up, the depth and persistency of poverty needs to be further analyzed and taken into consideration for child sensitive social policy design and budget prioritization. Currently in Greece, despite the abundance of information and data there is no clear narrative depicting how the measures all link together and affect the probability of a child to fall into poverty. Present arrangements may be a missed opportunity to establish a coherent measurement framework which could bring in core aspects of child poverty alongside a wider set of dimensions and non-material deprivations, pointing to the causes and impacts of child poverty. The newly established Strategy for Poverty and Social Inclusion, from MoLSA is a bold step towards that direction.

II. Access to Health Services

A. Main data

Free and effective access to healthcare

Access to high-quality care and services is a critical part of children's wellbeing that helps them to reach their full potential.³² Improving access to healthcare services can positively affect children, not only as service users themselves but also the people they share households with. This chapter will first look into the health profile of children in need in Greece in relation to their accessibility and access to health services followed by the analysis of the main children's unmet medical needs and the barriers of access that reduce the take-up of healthcare services.

1. Healthcare landscape of children in Greece and major barriers

Greece has made significant strides during the past decades improving health outcomes for children and adolescents. However, inequalities within the country persist. Most pointedly, according to recent data, despite universal coverage, one in ten households were not able to access healthcare services, placing Greece second on report for unmet needs for medical care in the EU.³³ The socioeconomic conditions of children in need demonstrates that the main barriers to accessing healthcare are **the costs, proximity and accessibility to health services particularly for low income families, migrant children, children living in rural areas and the Roma populations**. In the broader picture, there are severe inequalities of burden sharing between low- and high-income households, with the lowest-income ones taking the highest toll and greatest costs of unmet medical needs. For example, evidence below shows that in 2017 the rate of families with children with income below 60% of the median equivalized income (Table One) that were experiencing unmet medical care needs was double compared to families above the same threshold.

Disaggregating data across income groups, household headship and geographic areas unmask inequalities among children most in need, not always visible in national averages. Comparing the level and composition of access across groups provides **a better outlook over who these children are, while pointing to the why and how** they are in this situation. With the COVID-19 pandemic threatening to exacerbate socioeconomic inequalities worldwide, it is essential to focus attention and investments in redressing those vulnerabilities that undermine human potential for all those children left behind.

1.1. Health profile of children in Greece

Good health status of children in Greece is overshadowed by growing inequalities due to out of pocket and informal payments

In Greece, the 98.1% of children aged 2-14 years old is reporting good or very good, health status in overall. When it comes to examining more detailed children by level

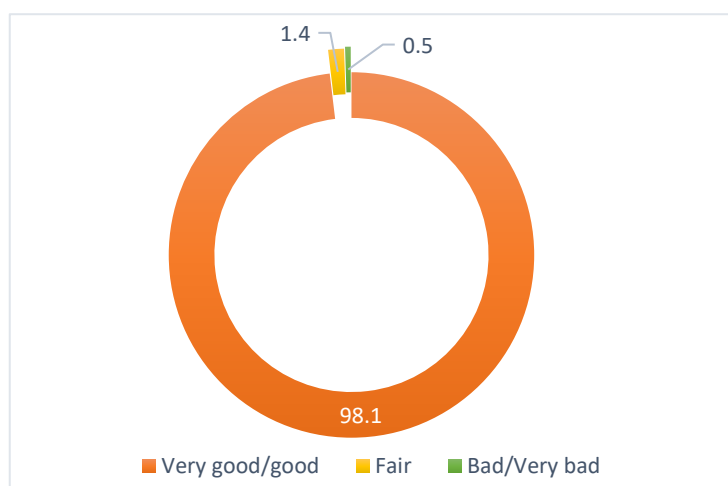
³² Unicef. 2021. Health and child development.

³³ OCED (2019), "State of Health in the EU: Country Health Profile", OECD Publishing Paris. Available from: <<https://www.oecd.org/greece/greece-country-health-profile-2019-d87da56a-en.htm>>

of general health and income quintiles (Figures 1, 2 and 3), EU-SILC data reveal that in 2017 very good health is reported far more frequently by children in all quintiles. In all cases the percentage is above 93%.

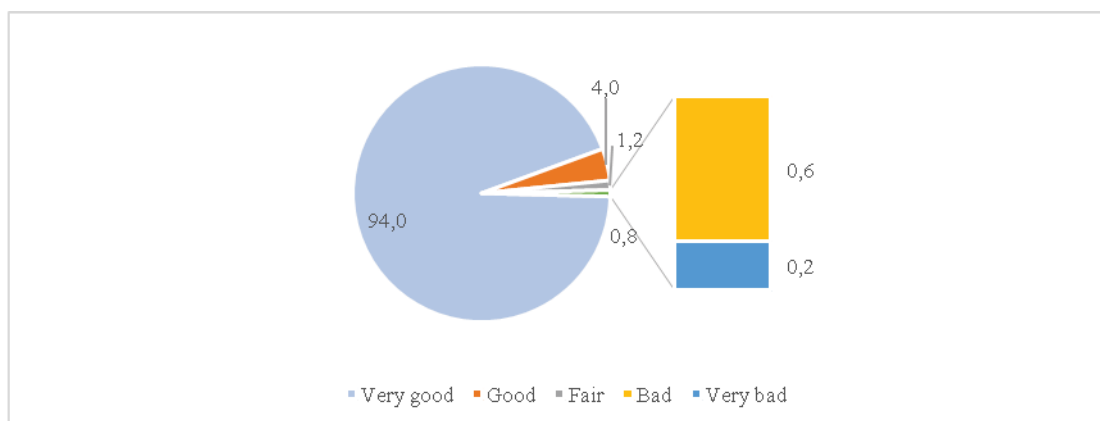
Furthermore Figure 4 provides the proportion of children 0-15 years old experiencing severe or some (moderate) limitations in their daily activities. It becomes obvious as data shows that the majority of children in all ages do not have any problem in Greece (97% or more) or the EU-27 (more than 95%). In addition, the proportion of children severely limited in daily activities varies a lot across the different ages, ranging from 1.1% (for the age category 10-15 years) and 0.4% for the age category less than 9 years. In the EU-27 the results are very similar and slightly higher.

Figure 1 General health status of children in Greece aged 2-14 years old



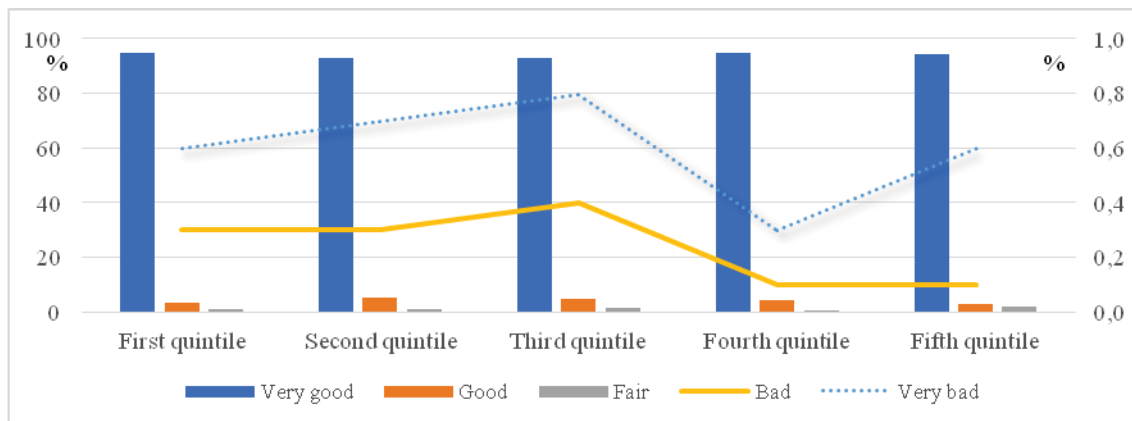
Source: Source: [ELSTAT, 2019 Health Survey: Health of Children aged 2 to 14 years old](#)

Figure 2 Share of children 0-15 years old by level of general health (%), Greece, 2017



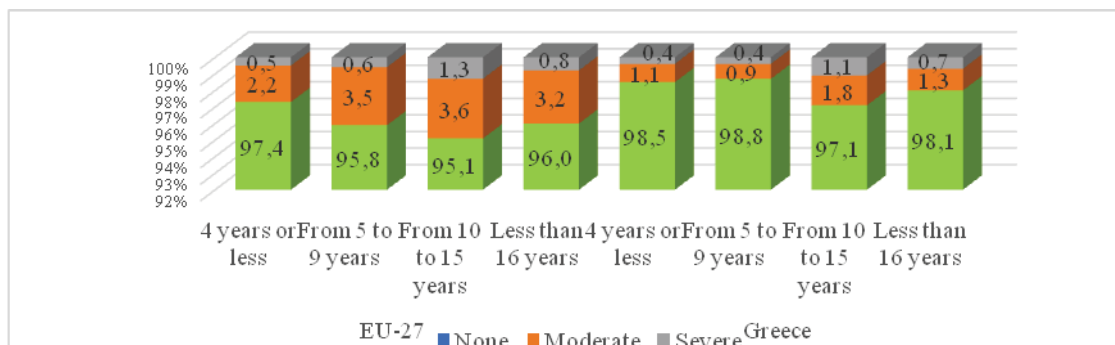
Source: Eurostat. Authors elaboration from EU-SILC

Figure 3 Share of children 0-15 years old, by level of general health* and income quintile (%), Greece, 2017



* Right axis: Very bad and bad. Left axis: Very good, God and Fair / Source: Eurostat. Authors elaboration from EU-SILC

Figure 4 GALI Indicator: Share of children 0-15 years old, with limitation in daily activities due to health problems during the past six months (%), EU-27 and Greece, 2017



Source: Eurostat. Authors elaboration from EU-SILC

However, such levels of good health are achieved with a significant amount out of pocket payments (OOP), a burden disproportionately affecting poor households and further widening the gap between those who can and cannot access adequate and effective health services. (Figure 5).

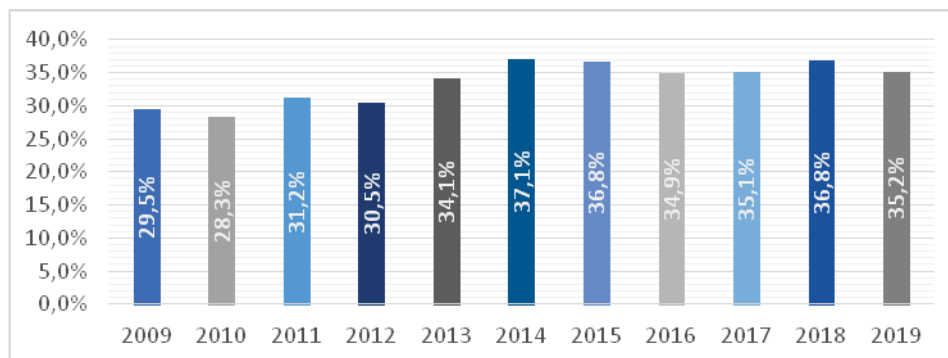
Out-of-pocket (OOP) payments in Greece are remarkably high, **more than twice (35.2%) the EU average (16%).**³⁴ In 2017, Greece had one of the highest levels of OOP spending as a share of household budget in the EU (4.2% compared to the EU average of 2.2%). **Such heavy reliance on OOP payments as a source of health financing is correlated with inequalities in access.** Figure 2 below demonstrates the OOP payments as a percentage of total current health expenditure over the past decade. For example, data on catastrophic expenditure³⁵ on health by households show that the share of spending on inpatient care is high, with 12 % for the poorest

³⁴ Commission Staff Working Document ‘State of Health in the EU: Companion Report 2019’, SWD(2019)377, p. 31.

³⁵ WHO has proposed that health expenditure be viewed as catastrophic whenever it is greater than or equal to 40% of a household's non-subsistence income, i.e. income available after basic needs have been met.

income group.³⁶ As poorer households are unlikely to seek hospital care privately, this figure suggests that such payments are primarily made in public health care centers.

Figure 5 Out-of-pocket expenditure on healthcare as a percentage of total current health expenditure



Source: Eurostat (2021) (tepsr_sp310)

Informal payments are reportedly being made in public hospitals either to expedite waiting time or ensure effective access to healthcare and better quality of services. More than 25% of OOP health expenditure in Greece includes informal, under-the-table or side payments (primarily to surgeons),³⁷ contributing to a parallel or hidden economy within the health system and raising serious questions about access barriers to health-care services.³⁸ One main reason attributed to such high percentages of informal payments is the lack of a rational pricing and remuneration policy within the health-care system. Surveys demonstrated that almost one in three respondents who consumed health services over the past 12 months reported making at least one informal payment.

Lastly, with regard to access to medical services, two areas seem to be of particular concern for the poorest segments of child and youth population: dental care and ophthalmology (including braces and spectacles/corrective lenses respectively). In real terms, 4.4% of children in Greece stated in 2017 that they have unmet dental needs against 1.6% EU27 while the 2.4% have unmet medical needs, against a 2.6% EU27. This can be partly explained by the fact that dental care services are not included only in the public healthcare basket and parents have to provide high out-of-pocket payments for these treatments (EUROSTAT, 2021).³⁹

³⁶ WHO (2019) Monitoring and documenting systemic and health effects of health reforms in Greece, Assessment Report

³⁷ It should be noted that national authorities have acknowledged the scale of the problem as Ministerial Decision No A3a/oik.9713618 on establishing, organizing and operating the surgery list is a positive measure towards increased transparency and equality.

³⁸ WHO (2019), *ibid.*

³⁹ EU- SILK data (2021), **Children with unmet needs for medical examination or treatment by income group, household composition and degree of urbanization, available at [ilc_hch14]**

Mental health problems are increasingly affecting children and young people in Greece, even more so in the wake of the COVID-19 pandemic:

Data on mental health problems are not systematically collected for children and young people in Greece. Even when financial data on expenditures are available for mental health services, these are often not disaggregated beyond a distinction between hospital-based and community-based services.

Despite such limitations a 15.2% of children in Greece have confirmed suffering from anxiety, nervousness, restlessness or conduct disorder.⁴⁰ Taking into account that mental health data on adults have exhibited a severe deterioration,^{41 42} particularly in the prevalence of suicidal ideation and reported suicide attempts,⁴³ it is expected that children have been accordingly exposed to increased levels of stress and anxiety resulting in increasing needs for mental health coverage. Such development have been largely associated with the austerity measures the past decade and subsequent cuts to benefits, entitlements, unemployment and under-employment, state of household debt and increasing homelessness, further exacerbated by the COVID – 19 pandemic.

Meanwhile, there is a severe underinvestment in mental health services for children and adolescents resulting into de facto limited access.^{44 45} For example, out of the 54 assessed prefectures in 2016, 20 prefectures are without mental health services for children and adolescents with the remaining ones reporting inadequate staff numbers.⁴⁶ The majority of relevant services for children and adolescents are concentrated in Athens and Thessaloniki, whether they are specialized psychiatric units of hospitalization in public hospitals or outpatient counseling services.

The lack of a mental health and social protection services framework primarily at the prevention level, with sufficient and suitable personnel, and specialized services at the community level especially for children with severe mental disabilities and their families, compromises children's social protection rights, making them vulnerable to neglect, abandonment further increasing prospects of institutionalization.⁴⁷ In addition, the rigid implementation of the new Integrated Health Care Regulation is effectively restricting remedies of Special Education and reduces the role of several

⁴⁰ ELSTAT (2019), Health Survey – Health of Children aged 2 to 14 years old

⁴¹ Economou M, Madianos M, Peppou LE, Patelakis A, Stefanis CN (2013a). Major depression in the era of economic crisis: a replication of a cross-sectional study across Greece. *J Affect Disord.* 145(3):308– 14.

⁴² Antonakakis & Collins, 2014; Christodoulou & Christodoulou, 2013; Madianos et al., 2014; Madianos MG, Alexiou T, Patelakis A, Economou M (2014). Suicide, unemployment and other socioeconomic factors: evidence from the economic crisis in Greece. *Eur J Psychiat.* 28(1):39–49

⁴³ Rachiotis G, Stuckler D, McKee M, Hadjichristodoulou C (2015). What has happened to suicides during the Greek economic crisis? Findings from an ecological study of suicides and their determinants (2003–2012). *BMJ Open.* 5(3): e007295. doi:10.1136/bmjopen-2014-007295.

⁴⁴ WHO (2019), Monitoring and documenting systemic and health effects of health reforms in Greece. Assessment report, p. 29.

⁴⁵ ESPN Thematic Report on Inequalities in access to healthcare in Greece, 2018, p. 14.

⁴⁶ Karagianni, P. Youth mental health context in Greece, *The European Health Psychologist*, vol 18, issue 3, p. 121

⁴⁷ Greek Ombudsman (2019): *Parallel Report on the Implementation of the UN Convention on the Rights of the Child (Greece)*, Athens, https://tbinternet.ohchr.org/Treaties/CRC/Shared%20Documents/GRC/INT_CRC_IFN_GRC_40862_E.pdf

professional specializations in the area, such as Psychologists, Ergotherapists, Logopedists, Logotherapists, Physiotherapists Associations.⁴⁸

Applying a human rights lens to child mental health demands recognizing the glaring neglect of mental health as a policy and resourcing priority, through concrete actions at the national and subnational level; firstly to improve coverage and access and more importantly addressing mental health through preventive and complementary measures.

Obesity levels are alarmingly high:

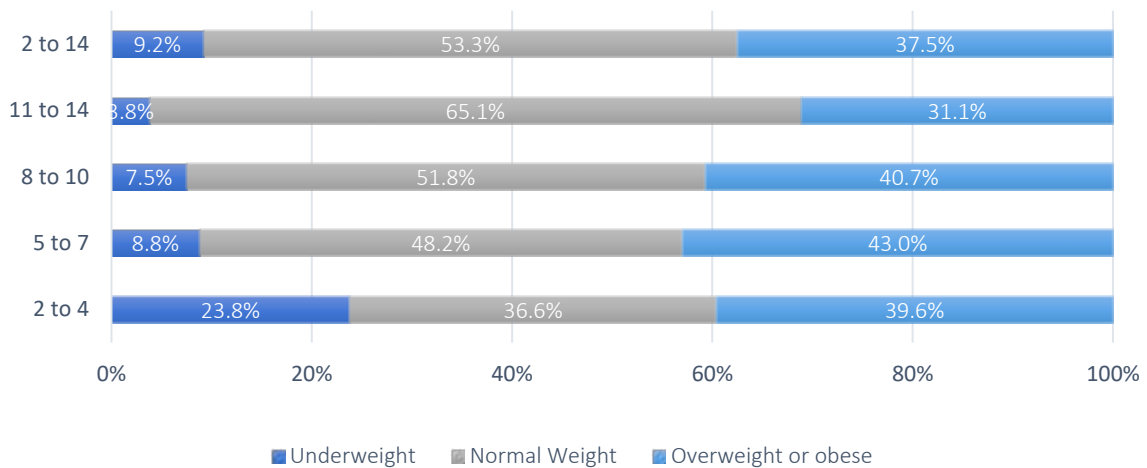
Overweight and obesity are a growing threat to children's well-being in Greece, mostly driven by a trap of unhealthy and processed foods combined with a lack of physical activity and sedentary behavior.⁴⁹ In 2019, out of the total children aged 2 to 14 years old **37.5% were overweight or obese**, a striking rise since 2005. Figure 6 below shows the percentage distribution based on age group, by BMI category (ELSTAT, 2021). **Approximately 1 in 3 children in Greece were obese in 2019 in any age group with boys demonstrating higher obesity levels than girls**, which is higher proportion than the EU average (12.5%, i.e. one in eight children).

These high rates among both children can be explained partly by poor nutrition (increased intake of energy-dense foods that are high in fat and sugars and low in vitamins, minerals and other healthy micronutrients) and low physical activity (due to increasing urbanization, increasingly sedentary nature of many forms of work and changing means of transportation). For instance, only one in nine 15-year-olds reported doing at least some moderate physical activity each day, among the lowest rates in Europe. While it is agreed that both individual factors such as genetic susceptibility and behavior are important in life-long weight gain, evidence globally connects obesity to environmental and societal changes associated with lack of supportive policies in sectors such as health, agriculture, environment, food processing, distribution, marketing, and education.

⁴⁸ Greek National Commission for Human Rights (2020): *Information relevant to the implementation of the Convention on the Rights of the Child*, Submitted Report to the UN Committee on the Rights of the Child, Athens, available at:

https://www.nchr.gr/images/pdf/apofaseis/paidia/GNCHR_Submission_to_UNCRC.pdf

⁴⁹ Grigorakis DA, Georgoulis M, Psarra G, Tambalis KD, Panagiotakos DB, Sidossis LS (2015). Prevalence and lifestyle determinants of central obesity in children. *Eur J Nutr*, Aug 2

Figure 6 Percentage distribution based on age group, by BMI category

Source: ELSTAT (2021)

In a dedicated study on child obesity in Greece,⁵⁰ maternal overweight and obesity before pregnancy were reported as strongest perinatal predictors of childhood elevated total and visceral fat mass. In addition to perinatal factors, higher socio-economic factors were also found inversely correlated with childhood obesity or increased total body fat. In particular, parental higher educational level and mainly maternal educational level demonstrated a negative association with occurrence of childhood obesity, higher total body fat and visceral body fat mass levels.⁵¹

Lastly, regarding parental BMI, parental obesity was also closely linked with the occurrence of high levels of total body and visceral body fat mass in children. *Apart from the “inherited genetic risk, children adopt behavioral patterns of their patterns (eating patterns and sedentary physical activity) further exacerbating obesity risks”.*⁵² Lastly it should be noted that in the same study on child obesity in Greece, a significant factor associated with childhood obesity was the time spent by children watching TV.

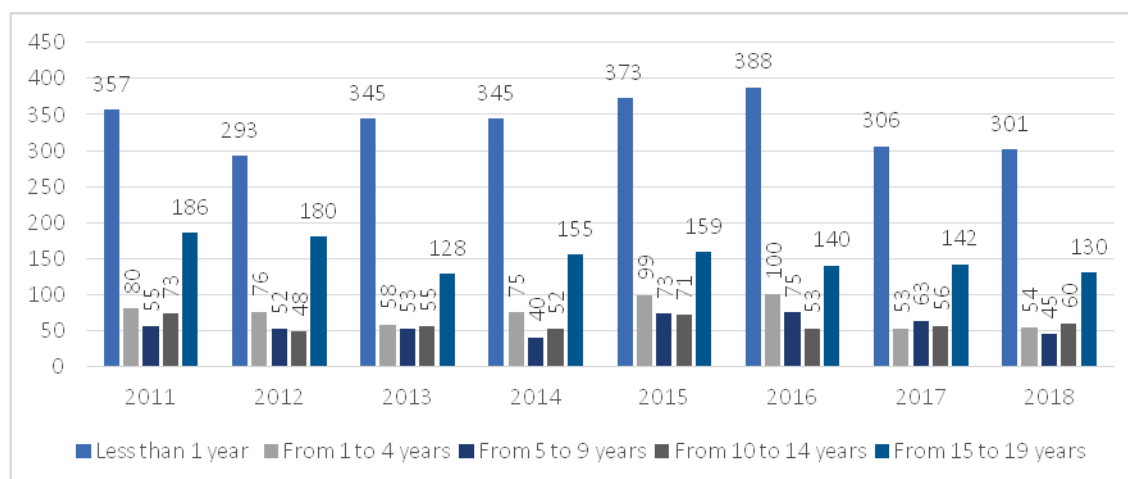
Deaths from health complications in children are extremely high:

Although Greece records a very low under-five mortality rate (total: 3,7 deaths per 1.000 live births), 5,447 children died during the period 2011-2018 due to health complications and other accidents. The vast majority of deaths involved children aged less than 1 year (2,708), followed by children aged from 15 to 19 years old (1,220). Deaths from health complications (80%) are far higher than deaths from other accidents (20%) at any age group.

⁵⁰ G Moschonis et al.(2016), Perinatal, sociodemographic and lifestyle correlates of increased total and visceral fat mass levels in schoolchildren in Greece: the Healthy Growth Study, *Public Health Nutrition*: 20(4), 660–670

⁵¹ Ibid.

⁵² Manios, Y (2010), Determinants of Childhood Obesity and association with maternal perceptions of their children’s weight status: the Genesis Study, *Journal of the Academy of Nutrition and Dietetics*, VOLUME 110, ISSUE 10, OCTOBER 01, 2010

Figure 7 Total deaths per year by age group


Source: EUROSTAT (2021) (HLTH_CD_ARO)

1.2 Unmet needs

2.4% of all children aged 0-15 in Greece reported in 2017 through their parents unmet needs for medical examination or treatment compared with the **1.6% EU-27 average (Figures 8 and 9)**. The high-risk categories were **children in families with below 60% of median equivalized income** (4.5% compared with the 2.8% EU-27 average), **single parent families with below 60% of median equivalized income** (4.1% compared with a 1.9% EU-27 average) and **children in families living in rural areas** (3.7% compared to 1.6% for children in towns / suburbs and 2.2% for children in cities).⁵³

Table 1 Percentage of unmet health care needs (medical) for households with children in terms of income – Greece and EU27 (2017)

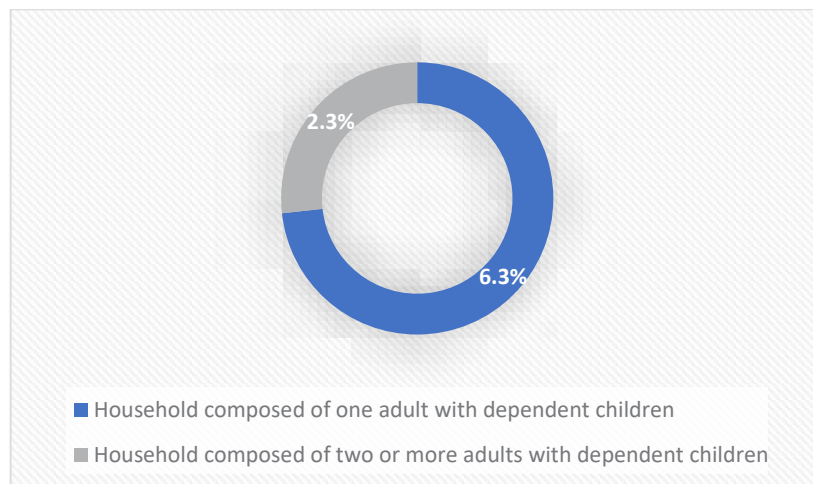
Income Group	Greece	EU-27
Below 60% of median equivalized income	4.5%	3%
Above 60% of median equivalized income	1.9%	1.3%
Total	2.4%	1.6%

Source: EUROSTAT (2021) ((ilc_hch14)

In the poorest income quantile, almost 20% of the households (1 in 5) reported unmet needs, while only the 3% of the richest households reported unmet needs. Additionally, single parent families report more significant difficulties in addressing health care needs of their children (6.3%) compared to other households (2.3%) (see Figure 8 below).

⁵³ EUROSTAT 2021 (ilc_hch14)

Figure 8 Percentage of unmet health care needs for children in terms of household type – Greece (2017)



Source: EUROSTAT 2021 (ilc_hch14)

Table 2 Percentage of unmet health care needs for children in terms of household type – Greece by degree of urbanization (2017)

	Cities	Towns and suburbs	Rural areas
Households of one adult with dependent children	9,6%	4,6%	0% (low reliability)
Households of two or more adults with dependent children	1,9%	1,5%	3,8%

Source: EUROSTAT 2021 (ilc_hch14)

The basic reason identified for children with unmet needs for medical examination or treatment is the **cost** while **proximity** and **waiting list** are identified as additional reasons.

Table 3: Share of people reported unmet needs due to waiting times, distance or transport, or cost.

Unmet needs for any reason (combination of (i), (ii) or (iii))	Not receiving care timely, or not at all, due to waiting time (i)	Not receiving care timely, or not at all, due to distance or transport (ii)	Not receiving care due to financial reason (iii)				
			Any type of care (a, b, c or d)	Medical care (a)	Prescribed medicines (b)	Mental health care (c)	Dental care (d)
30.2	15.0	6.9	25.3	18.8	14.9	9.7	20.1

Source: OECD (2020)⁵⁴

⁵⁴ OECD, Unmet needs for healthcare: Comparing approaches and results from international surveys, January 2020.

⁵⁴ European Commission, State of Health in the EU Greece Country Health Profile 2019, p. 11.

Cost of travel for low-income families is often prohibitive given that there is no provision for additional travel costs coverage (including residence costs of parents in case of children hospitalization outside their permanent place of residence). Travelling for effective health treatment of children is a major concern in Greece, given that there are not sound mechanisms to allow adequate planning and optimal allocation of physical and human resources in the hospital sector. Services are very heavily concentrated in large cities,⁵⁵ while rural areas lack both specialist staff and facilities. There is a large imbalance in the distribution of the health workforce, both geographically and in terms of skill mix.⁵⁶

As previously discussed, the need to pay for a medical or dental visit out of pocket either formally or ‘under the table’, often a luxury alternative for low-income and particularly single parent families and families with many dependent children.

Meanwhile, more than 90% of families reported facing difficulties in affording the costs of health care during personal interviews for the 2016 Module on Access to services (see Table 4 below). This was the highest non-affordability percentage between all countries participating in the survey.

Table 4 Affordability of health care services in Greece (2016)

Affordability rate	Percentage
With great difficulty	32%
With difficulty	34.7%
With some difficulty	2.7%
Fairly easily	7.7%
Easily	2.6%
Very easily	0.4%

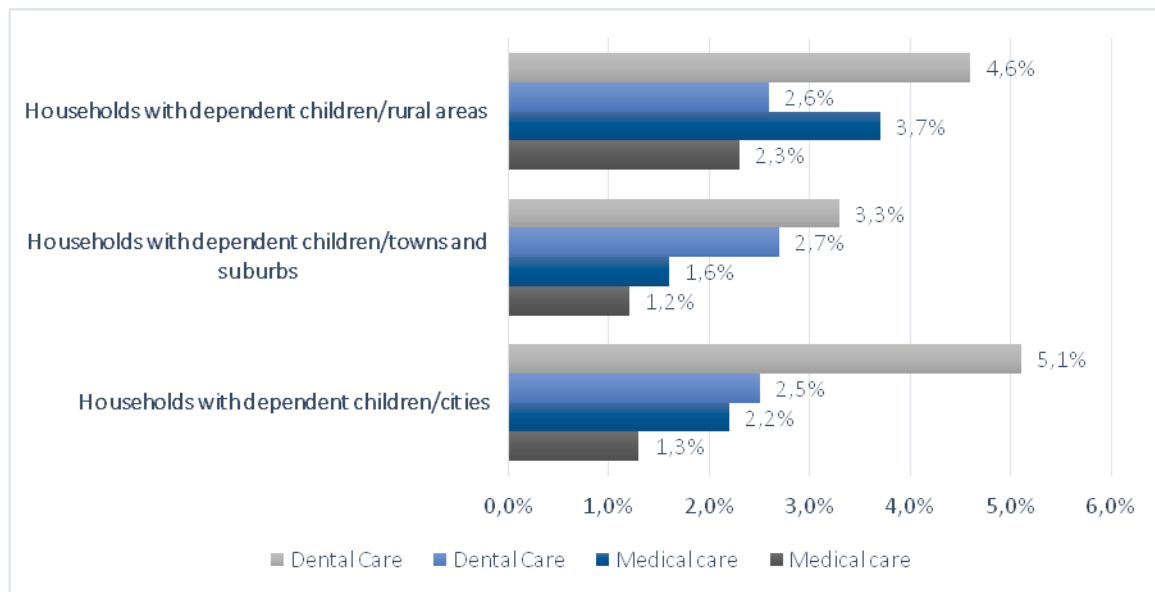
Source: 2016 Module on Access to services, p. 33.

Concerns over unmet health needs become more alarming as we compare Greece with the EU-27 average (see Figure 9 below). The percentage of children at risk of poverty, who at the same time living in households declaring unmet medical needs for at least one child is higher than the EU-27 average, regardless their place of residence. Almost the sole reason (98,2%) for unmet dental needs is identified the cost of the service as it is considered too expensive. Figure 10 below, summarizes these findings and highlights the strong gaps of Greece in comparison with the EU 27 average.

⁵⁵ All General Pediatric Hospitals are located in the two largest cities of Greece, Athens and Thessaloniki.

⁵⁶ Economou C, Kaitelidou D, Karanikolos M, Maresso A. Greece: Health system review. Health Systems in Transition, 2017; 19(5):1–192.

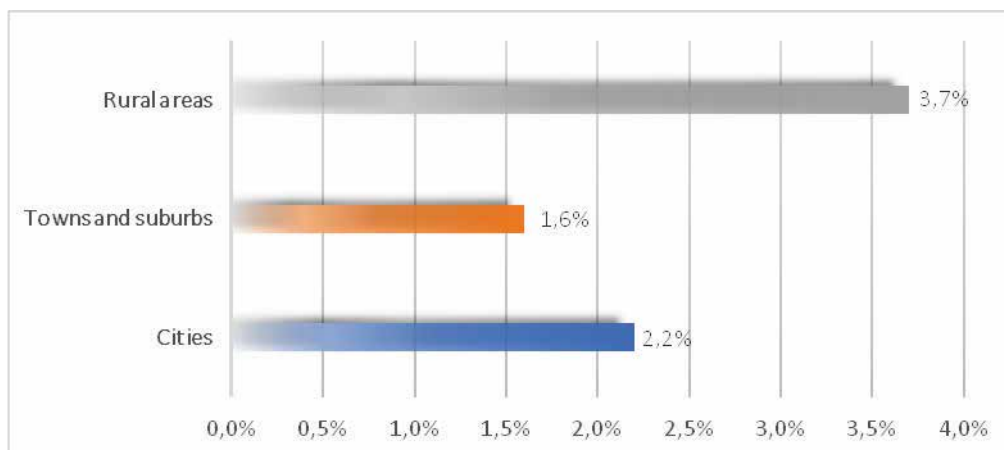
Figure 9 Percentage of children at risk of poverty living in households declaring unmet medical and dental needs for at least one child, EU-27 and Greece children at risk of poverty (2017)



Source: EUROSTAT (ilc_hch14)

Meanwhile, it should be noted that, regardless of the type of household that children are living in, the highest percentage of unmet medical and dental needs are in rural areas. This is also confirmed by the data on the percentage of children unmet health care needs in terms of their place of residence. The highest proportion of unmet health care needs in Greece in terms of the degree of urbanization, with regions classified as cities, towns and suburbs, or rural areas, was reported in rural areas (see Figure 10 below).

Figure 10: Percentage of children unmet health care needs in terms of their place of residence - Greece (2017)



Source: EUROSTAT (2021) (ilc_hch14)

The reason behind the large difference among cities and rural areas is due to Greece's skewed distribution of health care personnel and resources, and inefficient coordination and management/referrals services in the health sector. For example, some areas reportedly have three times as many doctors and nurses as others.

The institutional framework on access to healthcare

The economic crisis has intensified a number of structural challenges in the Greek national health system already vulnerable to shocks and unable to meet the increasing and evolving needs of children and youth. Most notably, during the crisis approximately 2.5 million people lost their social health insurance (SHI) rights and were asked to meet insurmountable barriers to accessing health care.⁵⁷ While the Greek health system has traditionally relied heavily on a large share of private financing with increasing OOP payments, mainly due to fiscal exposures in the public health sector, several bold steps have been made since 2015, including legislation providing free access to care⁵⁸ for uninsured Greeks and immigrants, abolition of some kinds of cost sharing and institutionalization of the surgical list; setting the foundations for more effective and equitable access to health services.

Currently, the *National Health System (ESY)*⁵⁹ provides healthcare benefits/services through a network of public/state providers and contracted private providers of primary, hospital and ambulatory care. People affiliated with the main social insurance fund (*Unified Agency for Social Insurance - EFKA*) contribute a fixed premium and are entitled to access (free of charge) all public primary (medical care, dental care and diagnostic examinations) and secondary (hospital treatment) healthcare services. They are also entitled, though on a cost-sharing basis, to private healthcare services affiliated with the relevant state agency (*EOPYY*).⁶⁰ Regarding hospital treatment in private clinics contracted with EOPYY, 70% of the total cost is paid by EOPYY and 30% by the insured. With regard to children, all children up to 18 years old, irrespective of their nationality, legal status or possession of legal residence documents, are entitled to free access to public health facilities and services.⁶¹

With regard to pharmaceutical coverage, there is usually a co-payment of 25% of the total cost of medicinal products. Some patients' groups, including refugees,

⁵⁷ WHO (2019)

⁵⁸ A new reform concept for primary health care (PHC) adopted in 2017 aims to improve access to essential quality services (short term); strengthen individuals and communities (mid term); and encourage macroeconomic and cultural change (long term), partly envisaged through Law 4486/2017.

⁵⁹ Introduced by the *Law No. 1397/1983*.

⁶⁰ *The National Organization for the Provision of Health Services (EOPYY)* negotiates contracts and remunerates health professionals on the basis of a *Health Benefits Regulation (EKPY)* prescribing the benefits basket for the beneficiaries of the system. This basket includes: medical treatment; diagnostic/laboratory/clinical tests; dental treatment; physiotherapy, occupational therapy, speech therapy, psychotherapy; medication, consumables, dietary supplements, medical devices; hospital treatment; supplementary healthcare (orthopedics, eyeglasses, hearing aids, prosthetics etc.); long-term care; obstetric care and ivf; healthcare abroad; vaccination programmes.

In this case, for diagnostic examinations EOPYY pays 85% and the insured person pays 15%; for medical examinations by doctors contracted with EOPYY (but not dentists), EOPYY pays 100% of the doctor's fee.

⁶¹ Law No. 4368/2016, Art. 33, par. 2(c)(i).

unaccompanied minors and people with a disability rate above 67% receive prescribed medicines free of charge.⁶²

Taking into account that access to the public healthcare system is subject to affiliation with the social insurance system and usually demands co-payments, the State has adopted a set of complementary policies aimed to facilitate access to healthcare for persons and families that do not meet this requirement.⁶³ These policies are classified in line with their personal (category of children) and material (eligibility conditions and content) to the following categories:

a) policies focusing on persons and their family members who are uninsured or members of vulnerable groups who are entitled to free access to the ESY services and have access to medical and, to some extent, to pharmaceutical treatment.⁶⁴ Children up to 18 years of age are included as beneficiaries of this measure irrespective of their residency status in Greece. The only administrative condition for free access to the public healthcare services is that claimants must possess (or acquire, if they do not already have one) a Social Security Number (AMKA). Persons and their family members who satisfy a specific set of eligibility conditions applied to income and property are entitled to zero participation in the medication while the same applies to specific categories⁶⁵ of children for whom no income or property test is required.

b) policies to address deprivations and disadvantages of specific groups; The Ministry of Health has developed specific vaccination programmes for Vulnerable Groups⁶⁶ and Special Groups,⁶⁷ including Roma populations, unable to enroll in the *National Vaccination Programme for babies*, under a pro-health policy regulated by the *Ministerial Decision No. 49627/4.7.2019*.⁶⁸

c) policies for asylum seekers / international or subsidiary protection beneficiaries. Children of asylum-seeking families are entitled to free access to public health services and pharmaceutical treatment, irrespective of their employment or their financial situation. This is subject to the holding of the so-called Foreigner's Temporary Insurance and Health Coverage Number (PAAYPE), which was introduced by art. 55 of the IPA, replacing the previous

⁶² Joint Ministerial Decision No. A3(γ)/ΓΠ/οικ.25132/4.4.2016, art. 6, par. 8.

⁶³ Law. 4368/2016, Art. 33, par. 2.

⁶⁴ Law 4368/2016 and implemented through the Joint Ministerial Decision No. A3(γ)/ΓΠ/οικ.25132/4.4.2016. Also older Joint Ministerial Decisions apply (No. Y4a/GP/οικ.48985/25.6.2014 and No. GP/οικ.56432/28.6.2014).

⁶⁵ Minors up to 18 years of age who are accommodated in residential social welfare centres or other relevant legal bodies of public law and not for profit private law or who are unaccompanied or are placed in foster care or are under a juvenile order or whose custody has been entrusted by a court order to third parties, by the presentation of a) the certificate of the Social Welfare Centre or other relevant centre hosting or performing the foster care procedure or b) the prosecutor Order for the appointment of a Commissioner or c) the decision appointing a Commissioner or d) the judicial decision awarding custody of a minor respectively;

⁶⁶ This category corresponds according to art. 2(8) of the *Law No. 4430/2016* to "population groups whose socio-economic inclusion is prevented due to physical or mental conditions or delinquent behaviour" and includes specific groups: children with disability or mental illness, juvenile delinquency.

⁶⁷ This category corresponds according to art. 2(8) of the *Law No. 4430/2016* to "population groups who are in disadvantage regarding their work integration due to social, economic and cultural reasons" and includes specific groups: children of single parent families, victims of domestic violence, Roma children, children at risk of poverty, etc..

⁶⁸ Available in Greek at: <https://www.e-nomothesia.gr/kat-ygeia/upourgike-apophase-49627-2019-phek-2782b-4-7-2019.html>.

Social Security Number (AMKA). PAAYPA is issued to asylum seekers together with their asylum seeker's card and is deactivated if the applicant loses the right to remain on the territory. With this number, asylum seekers are entitled free of charge access to necessary health, pharmaceutical and hospital care, including necessary psychiatric care where appropriate. All minors granted international protection have access - as laid down in art. 30 of the Law No. 4636/2019 - to healthcare under the same conditions as Greek nationals. Minors with special needs (pregnant women, disabled, persons who have undergone torture, rape or other forms of psychological, physical or sexual violence or any form of abuse, neglect, exploitation, torture, cruel, inhuman and degrading treatment) are entitled to adequate healthcare, including treatment of mental disorders when needed, under the same conditions as Greek nationals.

B. Institutional challenges and implementation barriers

These measures have had a positive impact in the short term however certain challenges remain. The skewed geographical distribution of health care facilities and personnel, ceilings on doctors' treatment activities, absence of real dental coverage; and persistence of informal payments are some of the barriers. Resultantly, patients continue to face problems with coordination, continuity of care, access and comprehensiveness of services leading to widening inequalities among different population groups. For example, uninsured people can access only public providers but not most private ones affiliated with EOPYY. Furthermore, new types of informal payments have emerged as a consequence of physicians' monthly activity caps. OOP payments continue to contribute to unmet need in the population particularly for the most vulnerable groups.

In addition, non-coverage of all the necessary special treatments (in kind and number) by EOPYY - despite recent changes in the legal framework - ⁶⁹ do not adequately meet the needs of children with disabilities.⁷⁰ The cost for these treatments is reimbursed by EOPYY, depending on the children's disability rate.⁷¹ However, the kind and number of therapies that are eligible for reimbursement is very low, resulting in the additional costs being covered by parents.⁷² Another challenge arises by a discrepancy in the age criteria in the legal framework, as on the one hand, children above 16 can no longer be seen by a pediatrician,⁷³ but on the other hand they are not legally considered adults.

⁶⁹ Law 4447/2016 Official Government Gazette A 241/2016, Article 34, Law 4549/2018 Official Government Gazette A, Article 27, EALE/G.P. 46633/15.06.2018 (ΕΑΛΕ/Γ.Π 46633/15.06.2018) Official Government Gazette B 2284, EALE/G.P. 46846/19.06.2018 (ΕΑΛΕ/Γ.Π 46846/ 19.06.2018) Official Government Gazette B 2315, OPIYY BoD Decision no. 47305/12.12.2018 Official Government Gazette B 5571

⁷⁰ The Greek Ombudsman (2019), Report (Article 72 Law 4488/2017) on the implementation of the UN Convention on the rights of persons with disabilities, p. 26.

⁷¹ In 2019 it was up to €250/month for children with milder disabilities, and up to €440/month for children with more severe disabilities, including autism.

⁷² The Greek Ombudsman (2020), Special report 2020 on the rights of persons with disabilities, p. 50.

⁷³ Ministerial Decision Γ5α/Γ.Π.οικ.79678/2018.

In essence key challenges revolve around:

a. Access to free medication

Only very low-income families are entitled to zero participation in the medication following certain income or property assessment criteria (see table 5), while all other families are excluded and are called to meet such costs despite their right to free access to health care. More specifically, eligibility for zero participation without any income or property test is granted to:

- i. minors up to 18 years of age who are accommodated in residential social welfare centres or other relevant legal bodies of public law and not for profit private law or who are unaccompanied or are placed in foster care or are under a juvenile order or whose custody has been entrusted by a court order to third parties;
- ii. persons accommodated in rehabilitation centres for drugs addicted or who follow relevant programmes as outpatient beneficiaries;
- iii. international or subsidiary protection beneficiaries and stateless persons, as well as their family members (spouse, children, dependent members), either they hold a residence permit in force or a decision is pending on an application for renewal of the status of international protection or on appeal against the application for renewal of a decision or at the time when there is a right of appeal;
- iv. those residing in Greece with residence status for humanitarian or exceptional reasons, as well as their family members, either they hold a residence permit in force or a decision is pending on an application for renewal of the status of international protection or on appeal against the application for renewal of a decision or at the time when there is a right of appeal;
- v. victims of human trafficking who are not affiliated to any social insurance fund and foreigners under the status of the UN Convention against Transnational Organized Crime and for as long as the protection and assistance measures last;
- vi. persons with a disability rate above 67%;
- vi. asylum seekers and their family members.

Table 5: Eligibility conditions for access to zero participation in medicines

FAMILY STRUCTURE	ANNUAL INCOME THRESHOLD	REAL ESTATE VALUE THRESHOLD	BANK DEPOSIT THRESHOLD
Single person	2.400 €	150.000 €	7.200 €
Family without any dependent members or single- parent family with one dependent member	3.600 €	165.000 €	10.800 €
Family with one dependent member or single- parent family with two dependent members	4.200 €	180.000 €	12.600 €
Family with two dependent members or single- parent family with three dependent members	4.800 €	195.000 €	14.400 €
Family with three dependent members or single-family with four dependent members	5.400 €	210.000 €	16.200 €
Family with four dependent members or single-family with five dependent members	6.000 €	225.000 €	18.000 €
Family with five dependent members or single- family with six dependent members	6.600 €	240.000 €	19.800 €

Source: Joint Ministerial Decision No. A3(γ)/ΓΠ/οικ.25132/4.4.2016

In this respect, GMI families are in principle covered, but other categories of low income families with dependent children should participate in the costs of medicine, given that GMIS is an extreme poverty focused policy. This means that children living in families at risk of relative poverty; their annual income is a) over the GMIS annual income thresholds (4.800 € for two adult and two children household) and b) below the EU-SILC annual income thresholds (11.059 € for two adult and two children under 14 years of age household) may be classified as children at risk of poverty according to the EU SILC, but they are not entitled to enroll in the GMIS and receive free medication respectively.

In addition, other categories of families with children in need, such as Roma children, homeless children or children experiencing severe housing deprivation, children with a disability rate below 67%,⁷⁴ as well as children with mental health issues - disability rate below 67%, should cover by themselves the additional costs of medicine.

a. Access to dental care

In addition, certain services included in the public primary healthcare package may not be available in practice. This is primarily the case for dental care, given that to

⁷⁴ Parents of children with a disability rate below 67% have to pay a contribution of 15% for diagnostic tests in private diagnostic centers that are contracted with the National Organization for the Provision of Health Services (EOPYY).

this date there are no functioning contracts between EOPYY and private dentists. Although children up to 18 years old are officially entitled to free dental treatment in public health centers, in practice, those are severely understaffed.⁷⁵ Hence, dental care is almost entirely funded out of pocket, with dental care expenditures corresponding to over 15% of total out-of-pocket expenditures in 2014.⁷⁶ This results in high proportions of unmet dental health needs for children. In 2019, unmet dental health needs were as high as 86,8% among 5-year-old children, 62% among 12-year-old children, and 60,1% among 15-year-old children. Access to dental care is even more limited for migrant children and children living in rural areas.⁷⁷ In addition, the majority of dental services for children and adolescents are concentrated in urban areas, creating additional travel costs for parents. Notably, out of the total 13,464 registered doctors with a dentist specialty, only 56 are NHS personnel, the majority of whom (31 doctors – 56%) are located in the Attica Region.⁷⁸

b. Unequal geographic distribution of doctors

Moreover, severe inequalities persist in the geographical distribution of health professionals between urban and rural areas and shortages of doctors working in public hospitals in rural, remote areas.⁷⁹ For example, the services delivered by rural primary care services mainly focus on treating urgent health problems, rather than engaging in prevention, health promotion, long-term care and rehabilitation.⁸⁰ Unequal geographical coverage of health services represents a serious operational challenge for vulnerable children (in particular children in Roma settlements,⁸¹ children seeking asylum,⁸² and children with disabilities⁸³) living in rural remote areas, considering the distance and travel time combined with the absence of convenient and affordable transport. Based on secondary analysis of data from the 2014 European Health Interview Survey (EHIS), persons aged above 15 years with disability have reportedly at least double rates of unmet health care needs compared to persons without disability, with cost, transportation problems or distance and long waiting lists being the most significant barriers.⁸⁴

⁷⁵ WHO Regional Office for Europe, "Monitoring and documenting systemic and health effects of health reforms in Greece", 2019. Available at:

https://www.euro.who.int/__data/assets/pdf_file/0011/394526/Monitoring-Documenting_Greece_eng.pdf

⁷⁶ OECD and World Health Organization, "State of Health in the EU · Greece · Country Health Profile 2019", Available at: https://ec.europa.eu/health/sites/default/files/state/docs/2019_chp_gr_english.pdf

⁷⁷ Hellenic Dental Association, "Nationwide epidemiological study of dental health", 2019

⁷⁸ ELSTAT and Ministry of Health

⁷⁹ WHO, "Greece: assessing health systems capacity to manage large influx of refugees and migrants in an evolving context:", 2020. Available at:

<https://apps.who.int/iris/bitstream/handle/10665/337563/9789289055093-eng.pdf>

⁸⁰ WHO, "Monitoring and documenting systemic and health effects of health reforms in Greece", 2019.

Available at: https://www.euro.who.int/__data/assets/pdf_file/0011/394526/Monitoring-Documenting_Greece_eng.pdf

⁸¹ Alexiadou E.A., "Ethnic Diversity and Access to Healthcare from a Human Rights Perspective: The Case of the Roma in Europe", *European Journal of Health Law*, 22 February 2018.

⁸² WHO, "Greece: assessing health systems capacity to manage large influx of refugees and migrants in an evolving context:", 2020. Available at:

<https://apps.who.int/iris/bitstream/handle/10665/337563/9789289055093-eng.pdf>

⁸³ National Confederation of Disabled People of Greece (NCDP) (2019), *Alternative Report of Greece 2019 (final version) and response to the List of Issues for the 22 Session (August 26 – September 20) of the UN Committee on the Rights of Persons with Disabilities*, p. 39.

⁸⁴ Rotarou, E., and Sakellariou, D. (2017). Access to health care in an age of austerity: disabled people's unmet needs in Greece, *Critical Public Health*, DOI:10.1080/09581596.2017.1394575.

c. Access to targeted health promotion and disease prevention programmes

The Ministry of Health is implementing health promotion and disease prevention programmes targeting children in need and their families, based particularly on the "*Guidelines for primary health care for children 0 to 18 years old*", drafted in 2017 by the *Institute of Child Health*⁸⁵. These Guidelines are applied:

- i) in daily clinical practice at the level of primary health care provision by women and men pediatricians, general practitioners and doctors of other specialties of primary health care (e.g. pathologists, cardiologists, ophthalmologists, child psychiatrists, etc.);
- ii) in training courses of health professionals and other staff of competent services in the public and private sector employed in structures and services related to the monitoring of children's health, as well as in awareness and information initiatives on issues of adoption of healthy attitudes and behaviors that contribute to the balanced development of the child and adolescent;
- iii) in awareness and information sessions for students, citizens/parents, teachers, and health professionals about monitoring the development and health of children, disseminating and adopting healthy attitudes and behaviors with the aim of promoting health and public health in general, at individual, family and community level. However, there are no programmes targeted to the needs of specific groups, such as Roma and migrant children, and children with disabilities.

d. Access to health education programmes

All students enrolled in primary and secondary education schools are entitled to follow free health education programmes developed by the so called Officers for health education/school activities. These Officers support the health education programmes implemented in the school units of their respective Primary/Secondary Education Directorates. Within their responsibilities, and among other things, they visit school units and attend school classes, and also supervise the progress of school programmes. Moreover, they encourage and support students in the process of discovering knowledge through research, data analysis / synthesis and the experimental approach. However, these services are available only in units with Officers for health education/school activities. The limited availability of such personnel restricts significantly access to health education programmes for children.

In terms of specific groups these barriers, exacerbate vulnerabilities primarily among:

- **Children with disabilities**: have de facto limited access to public Recovery and Rehabilitation Centers, due to their marginal number and their function in specific regional areas.⁸⁶ Recovery and rehabilitation Centres for children with disabilities are not operating in every Region in Greece (see Table 6) while access to the existing ones is subject to very long waiting lists.

⁸⁵ Ministry of Health, Greece (2020) <https://www.moh.gov.gr/articles/health/dieythynsh-prwtobathmias-frontidas-ygeias/draseis-kai-programmata-agwghs-ygeias/oikogeneiakos-programmatismos/5256-paidiatrikes-kateythynthries-odhgies?fdl=12938>.

⁸⁶ Greek National Commission for Human Rights (2019), Shadow Report submitted by the Greek National Commission for Human Rights to the UN Committee on the Rights of Persons with Disabilities in relation to the implementation by the Hellenic Republic of the Convention on the Rights of Persons with Disabilities and its Optional Protocol (CRPD), p. 37.

Table 6: Regional distribution of public recovery and rehabilitation services (2021)

Regional Health District	Recovery and rehabilitation Centres	Recovery and rehabilitation Centers for children with disabilities	Hospitals for Chronic Diseases	TOTAL
1 st			2	2
2 nd	1	3	5	9
3 rd			2	2
4 th	1	4	3	8
5 th		1	5	6
6 th			5	5
7 th		2	3	5
TOTAL	2	10	25	37

Source: Ministry of Health (June 2021).

Currently, there are only ten (10) rehabilitation centres for children with a disability (supervised by the Ministry of Health), which operate as independent legal entities and provide: Care and treatment; Rehabilitation (using occupational therapy, physiotherapy, speech therapy, psychological support, special education, sports programs, etc.); Socialization and social integration (psychological, cultural and artistic events); Special education (in kindergartens and schools).

Children with disabilities aged more than 6 months are entitled to access public intervention centers⁸⁷. However, there is a serious gap in public primary health services focusing on early intervention for this target group,⁸⁸ given their limited number and capacity, in addition to long waiting lists (waiting list for diagnosis in the national health system may take up to six months). Parents are thus obliged to purchase private services to facilitate early detection and treatment of diseases and developmental problems and meet their children's medical needs. Accordingly, no special treatments (speech therapies, occupational therapies, psychotherapies, physical therapies) are provided by public services thus parents with children with disabilities have to turn to private such services are again obliged to seek private providers. While such expenses are eligible for reimbursement, there are unjustified delays by the public insurance funds as the process is "*heavily bureaucratic and lacks transparency*".⁸⁹

⁸⁷ EI was regulated for the very first time in Greece through the Law No. 2817/2000, according to which "Diagnosis, Evaluation and Support Centers (DESC)" were established, for children especially aged 3 or more, which had the responsibility amongst others to introduce, design and implement intervention programmes.

⁸⁸ This is an issue of great concern for all infants, given that ECC centres do not provide early childhood intervention services.

⁸⁹ The Greek Ombudsman (2019), Report (Article 72 Law 4488/2017) on the implementation of the UN Convention on the rights of persons with disabilities, p. 25; The Greek Ombudsman (2020), Special report 2020 on the rights of persons with disabilities, p. 50.; Pan-Hellenic Federation of Parents and

Physical access of children with disabilities to the healthcare facilities is impaired by the inaccessibility of the buildings that accommodate those services resulting into restricted access and lower range and standards compare to other persons.⁹⁰

There is lack of pediatric specialists for the examination of children by the health committees of the Centers of Disability Accreditation (KEPA) as well as lack of a child-friendly environment.⁹¹

Asylum seeking, including unaccompanied children face serious barriers,⁹² although they have by law equal access to public health care with the same conditions applied to other Greek citizens, particularly linked to:

- i. the issue of PAAYPA⁹³;
- ii. the lack of interpreters and cultural mediators in the majority of public healthcare facilities⁹⁴ as well as limited adaptability of the system to their particular needs;
- iii. Limited knowledge, attitudes and clinical practice regarding refugee and migrant health among healthcare professionals;⁹⁵
- iv. Timely access to specialized health services.⁹⁶ Despite the relevant provision in national law which states that all newly arrived persons seeking asylum should be subject to reception and identification procedures in the islands, including medical screening and psychosocial assessment, there are *“deficiencies and difficulties in the process of identifying persons with serious diseases and/or persons with mental and intellectual disabilities during the process of reception of applicants for international protection”*.⁹⁷

Guardians of Disabled People (POSGAMEA) (2019), “Request of immediate resolving of the vital problems faced by the persons with disabilities and their representative organizations”, as referred in the Greek National Commission for Human Rights (2019), Shadow Report submitted by the Greek National Commission for Human Rights to the UN Committee on the Rights of Persons with Disabilities in relation to the implementation by the Hellenic Republic of the Convention on the Rights of Persons with Disabilities and its Optional Protocol (CRPD), p. 14.

⁹⁰ The Greek Ombudsman (2019), Report (Article 72 Law 4488/2017) on the implementation of the UN Convention on the rights of persons with disabilities, p. 25.

⁹¹ The Greek Ombudsman (2019), Report (Article 72 Law 4488/2017) on the implementation of the UN Convention on the rights of persons with disabilities, p. 26.

⁹² [European Committee of Social Rights published the decision on admissibility and on immediate measures in the case International Commission of Jurists \(ICJ\) and European Council for Refugees and Exiles \(ECRE\) v. Greece, Complaint No. 173/2018.](#)

⁹³ As access to PAAYPA is inter alia dependent on a full registration of a claim, and considering ongoing relevant delays particularly on the mainland, the extent to which and the time it takes for unregistered asylum seekers or applicants with police notes and/or only an initial registration of their claim to enjoy access to Greece’s healthcare system should be further assessed.

⁹⁴ WHO, “Greece: assessing health systems capacity to manage large influx of refugees and migrants in an evolving context:”, 2020. Available at:

<https://apps.who.int/iris/bitstream/handle/10665/337563/9789289055093-eng.pdf>

⁹⁵ Idem.

⁹⁶ Ravinder, B., Teresa Di Rosa, R. and Kallinikaki, T. (2021). Unaccompanied Minors in Greece and Italy: An Exploration of the Challenges for Social Work Within Tighter Immigration and Resource Constraints in Pandemic Times. *Social Sciences* 10: 134. <https://doi.org/10.3390/socsci10040134>

⁹⁷ Greek National Commission for Human Rights, ΕΚΘΕΣΗ ΑΝΑΦΟΡΑΣ ΓΙΑ ΤΟ ΠΡΟΣΦΥΓΙΚΟ ΚΑΙ ΤΟ ΜΕΤΑΝΑΣΤΕΥΤΙΚΟ ΖΗΤΗΜΑ, Β' Μέρος, September 2020, available in Greek at: <https://bit.ly/3dEfTbk>, p. 95.

Children in refugee camps:

As far as children residing in refugee camps are concerned, key challenges are related to their transportation and effective treatment by PEDY Units and ESY hospitals in their residence campus,⁹⁸ as well as the lack of specialized personnel in the camps. In 2020, a total of 113 doctors were present in the island RICs, including 4 in the RIC of Kos, 4 in the RIC of Leros, 5 in the Evros RIC, 3 in the RIC of Samos and 6 in the RIC of Chios. Another 17 doctors were present in the temporary Mavrovouni RIC.⁹⁹

And children of the Roma population in Greece:

While accurate data on their health status tend to be limited to specific localized outbreaks or vaccination uptake¹⁰⁰, qualitative studies demonstrate repeatedly that Roma have hindered access to quality healthcare due to lack of knowledge of their entitlements, proper registration and ID Documentation and have thus higher exposure to health risks (particularly for those children living in adjacent areas with no basic infrastructure).¹⁰¹ The COVID-19 outbreak further exacerbated their vulnerabilities in terms of access to adequate sanitary and hygiene conditions, antiseptics and drugs, healthcare and nursing.¹⁰² Although by law, Roma children have equal access to public healthcare under the same conditions applied to other Greek citizens, in practice they tend to use health services less than the general population due to a variety of reasons, including linguistic and cultural differences, lack of knowledge of their entitlements concerning welfare issues and available services, as well as experiences of discrimination within healthcare settings.¹⁰³

⁹⁸ Hospitals on the islands of the North east Aegean have great shortages of doctors and nursing staff and shortages of materials and equipment that make it impossible to serve the population. As the hospitals have daily high attendance in the Clinics, the TEP from refugees and migrants, they are therefore unable in many cases to respond.

⁹⁹ European Council on Refugees and Exiles, Greece Country Report: Healthcare, updated on 10 June 2021. Available at: https://asylumineurope.org/reports/country/greece/reception-conditions/health-care/#_ftn15

¹⁰⁰ In terms of access to vaccination programmes, the Commission Staff Working Document '*State of Health in the EU: Companion Report 2019*'¹⁰⁰ indicates a major measles outbreak in 2018 that affected mostly unvaccinated Roma children. In 2019, the Ministry of Health developed specific vaccination programmes for Vulnerable Groups and Special Groups, including Roma children, children with disabilities or mental illnesses, and migrant children¹⁰⁰. However, vaccination rates among Roma population are still much lower than those of the general population¹⁰⁰, with differences between 20 and 70% for each vaccine. Furthermore, Roma population seem to experience difficulties in accessing vaccination clinics, and receiving information on vaccinations.

¹⁰¹ Evelina Pappa, Simela Chatzikonstantinidou, George Chalkiopoulos, Angelos Papadopoulos, Dimitris Niakas. "Health-Related Quality of Life of the Roma in Greece: The Role of Socio-Economic Characteristics and Housing Conditions", *Int J Environ Res Public Health*. 2015 Jun; 12(6): 6669–6681. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4483723/>

¹⁰² Doctors of the World – Greek Delegation. "Empowering the Roma Community", Inception Report, July 2020. Available at: <https://mdmgreece.gr/app/uploads/2020/09/%C2%A9Mdm-Greece-2020-ROMA-Inception-Report-EN.pdf>

¹⁰³ Alexiadou E.A., "Ethnic Diversity and Access to Healthcare from a Human Rights Perspective: The Case of the Roma in Europe", *European Journal of Health Law*, 22 February 2018.

C. Key Conclusions

- Children in families with low income, in single headed families, and in rural areas are more likely to have unmet health care needs. The overarching reasons seem to be the cost of the healthcare service while proximity, particularly for children residing in rural areas, and timely availability are additional reasons. **In the broader picture, in terms of unmet needs, there are severe inequalities of burden sharing between low- and high-income households, with the lowest-income ones taking the highest toll and greatest costs of unmet medical needs.** In other words, economic burden tends to be higher in households/ environments that have the least capacity to prepare, finance and respond to the medical needs of their children.
- National funding requirements for mental health are increasing, while the capacities to address them is not growing in proportionate terms, **leaving hundreds of children with mental health problems behind.**
- Asylum seeking including unaccompanied children and migrant children **who face barriers in accessing healthcare services due to administrative or operational reasons remain unaccounted.**
- Children with disabilities depending on the type of support they need given that they cannot access free, effective, and timely specialized services, especially those living in rural areas.
- **Roma and refugee children** due to the lack of cultural mediators and interpreters in public healthcare facilities, limited understanding of benefits, and lack of adaptability of the healthcare system to their particular needs.
- In terms of data analysis, this report argues that as Greece's efforts are intensified towards better health outcomes for all children, it is **necessary to look at indicators afresh and in finer detail to capture the dimensions of unmet medical needs that accrue to the most vulnerable by delving deeper into distributional analysis, moving away from regional, national and subnational data to the household level.**

III. Access to adequate housing

Introduction

Homelessness and housing exclusion are severe manifestations of child poverty. Several factors may trigger the incidence of child homelessness: rising housing costs for their families, changes in the family environment, migration from third countries among others. Other long-time social and demographic trends such as low work intensity or increasing single parenthood may be drivers of homelessness, as may family breakdown and de-institutionalization without adequate follow-up support.

This chapter provides an overview of the current situation of effective access to adequate housing in Greece for children, attempts to identify institutional and operational gaps and outline ways for improvement. It critically examines the effectiveness of mechanisms in place to capture housing needs of children drawing on data on the take-up, unmet needs and barriers to access for households with children in need. Unmet needs are assessed against multiple housing deprivation aspects including housing cost overburden rate, financial burdens including arrears on mortgage or rent, overcrowding, etc. Analysis is complemented by a summary of the existing legal framework relevant to child sensitive housing provisions, highlighting challenges for further action. Special attention was paid in capturing the housing situation for children living in the streets, temporary or mobile homes that often go unaccounted in national surveys.

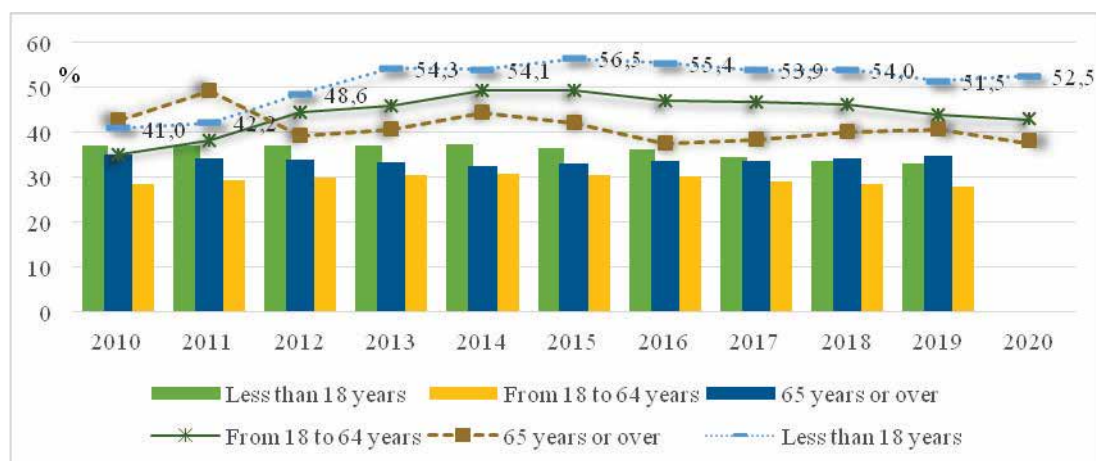
A. Main data

Greece's housing landscape for children

A way of examining whether housing is affordable is by the share of housing cost in total disposable income. Costs relating to housing are the main items of expenditure for many Greek households. In the Greek and European context, these expenses include rental or mortgage interest payments but also the cost of utilities such as water, electricity, gas or heating. These costs are not optional, as households cannot simply decide not to incur them. Looking at disposable income after housing costs are deducted, provides a more accurate measure of resources available for all other needs and their prioritization within the household. This is particularly true in Greece where housing costs have accounted for increasing proportions of disposable income, especially for those households in lower incomes.

In EU-27, even deducting the housing costs, children less than 18 years are the age group with the higher exposure at risk of poverty (approximately 35%), compared to other age groups, regardless of the year. However, it is observed that during economic crisis the rates in EU-27 increased.

Regarding Greece rates at-risk-of-poverty after deducting housing costs, it is observed that the country has higher rates in all age groups compared to EU-27. More specific, at the early years of the economic crisis (2010-2011) approximately half of people 65+ years were at risk-of-poverty, which decreased after 2012. That year, the rate at-risk-of-poverty of children less than 18 years increased significantly, and then continued to increase gradually over the following years, reaching a point where more than 50% of the aforementioned age group were at risk of poverty. (Figure 1).

Figure 1 At-risk-of-poverty rate after deducting housing costs by age categories (%), Greece and EU-27, 2010-2019

Source: Eurostat. Authors elaboration from [EU-SILC](#)

Housing cost overburden rate

According to Eurostat¹⁰⁴ the housing cost overburden rate is the percentage of the population living in households where the total housing costs ('net' of housing allowances) represent more than 40 % of disposable income ('net' of housing allowances).¹⁰⁵

At its meeting on 9 March 2015, the Council of the European Union (EPSCO) endorsed the key messages of the latest Annual report of the Social Protection Committee on the social situation in the European Union. The report identifies increasing **housing cost overburden rate as a 'social trend to watch' (Housing Europe, 2015)**.¹⁰⁶

Housing affordability may be analyzed through the housing cost overburden rate, that was 9.4 % in 2019 for the EU-27, while it was much higher for the poor segment of the population (35.4% in 2019 for the EU-27).

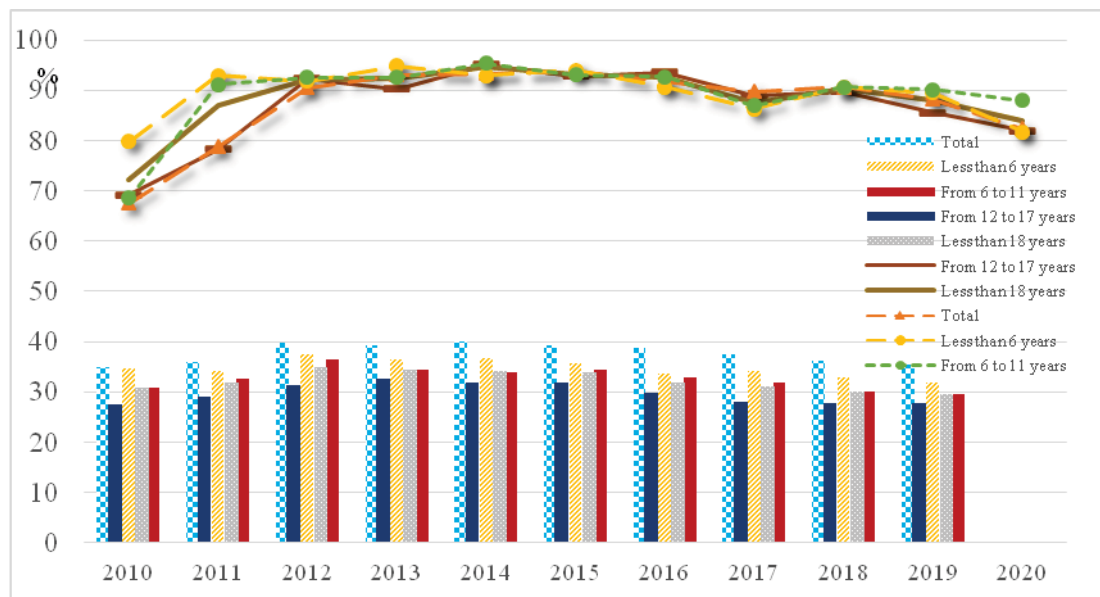
In Greece, in 2020, the overburden rate among poor children was over 82% (irrespective of their age). As in the case of the housing costs, the rates of housing overburden are significantly higher than the EU-27 average (Figure 2).

¹⁰⁴ See full details: <https://ec.europa.eu/eurostat/web/products-datasets/-/tessi165>, <https://ec.europa.eu/eurostat/web/products-datasets/-/tessi165>, EUROSTAT, Glossary: Housing cost overburden

¹⁰⁵ EUROSTAT, 2017, Housing costs - an excessive burden for 11 % of Europeans

¹⁰⁶ Housing Europe, 2015, Housing Cost Overburden Rate in the EU available at <https://www.housingeurope.eu/blog-566/housing-cost-overburden-rate-in-the-eu>,

Figure 2 Housing cost overburden rate among children at risk of poverty, (%) Greece and EU-27, 2010-2020*



Source: Eurostat. Authors elaboration from EU-SILC

Another key indicator helping us assess the problem of adequate housing for children is the ability of a household to pay the rent or mortgage. Based on EU-SILC data, single-parent and large families had great difficulty in paying their rent.

More specifically, the percentage of single-parent families that have difficulty paying their rent or mortgage was 20% on average for the years 2015-2020, while the corresponding percentage for large families is 30%. Compared to the EU27, Greece's rates are much higher for both single-parent and large families (see Table 1 below).

Table 1 Proportion of people reporting arrears on mortgage or rent payments by household type for poor households (below 60% of median equivalized income (2015-2020))

	2015		2016		2017		2018		2019		2020
	EL	EU 27	EL	EU 27	EL	EU 27	EL	EU 27	EL	EU 27	EL
Single person with dependent children	29.6%	14.8%	23%	11.7%	21.5%	12.8%	24.1%	11.8%	17.8%	10.6%	19.2%
Two adults with three or more dependent children	34.4%	16.2%	33.4%	13.9%	24.8%	15%	29.4%	15%	16.4%	10.8%	17.2%
Households with dependent children	27.4%	13.2%	30%	12.1%	24.9%	11%	24.4%	10.8%	18.3%	9.3%	23.8%

Note: Data for EU27 are estimated values / Source: Eurostat (2021) ([ILC_MDES06](#)).

Meanwhile in 2020, more than half (61%) of single-parent families were unable to pay their utility bills and maintain their dwelling, while the percentage for large families was 45.7%. Greece has around three times the EU27 rates for single-parent and large families unable to pay their utility bills. This shows that households with dependent children face a significant problem in meeting their basic needs (see Table 2 below).

Table 2 Proportion of people reporting arrears on utility bills by household type for poor households (below 60% of median equivalized income (2015-2020))

	2015		2016		2017		2018		2019		2020
	EL	EU27	EL	EU27	EL	EU27	EL	EU27	EL	EU27	EL
Single person with dependent children	69.4%	24.1%	74.4%	22.1%	63.9%	20.1%	64.8%	21.4%	69.4%	18.6%	61%
Two adults with three or more dependent children	74.3%	29.4%	64.7%	25.6%	67.6%	26%	63.9%	21%	57.5%	20.3%	45.7%
Households with dependent children	66.4%	26.8%	68.9%	23.6%	62.9%	21.5%	59.9%	20.7%	60.8%	18.3%	52.4%

Note: Data for EU27 are estimated values. Utility bills include electricity, heating, gas and water. / Source: Eurostat (2021) ([ILC_MDES07](#))

Take up: tenure status

EU-SILC survey data (2019) shows that 36.1% of low-income households with dependent children in Greece were owners of their property while only 6.7% of low-income families had mortgage or loan for their property. In comparison, only 24.8% of low-income households with dependent children in EU27 owned property and 7.2% of them had a mortgage or loan (see Table 3).

Table 3 Distribution of low-income households with dependent children by tenure status in Greece and EU-27 (2015-2020)

	2015		2016		2017		2018		2019		2020
	EL	EU27	EL	EU27	EL	EU27	EL	EU27	EL	EU27	EL
Owner	36%	28.1%	36.1%	28.1%	34.6%	26.3%	37.6%	25.4%	36.1%	24.8%	32.8%
Owner with mortgage or loan	8.2%	8.3%	8.6%	8.7%	9.3%	7.9%	9.6%	7.7%	6.7%	7.2%	7.5%
Tenant	20.6%	26.2%	20.3%	26.0%	21%	26.3%	21.3%	26.2%	20%	24.8%	19%
Tenant, rent at market price	16.4%	16.9%	16.5%	16.8%	15.9%	17.2%	17.3%	18.0%	15.9%	16.9%	12.9
Tenant, rent at reduced price or free	4.3%	9.4%	3.9%	9.2%	5.1%	9.2%	4%	8.2%	4.1%	7.9%	6%

Source: Eurostat (2021) (ilc_lvho02)

Unmet needs

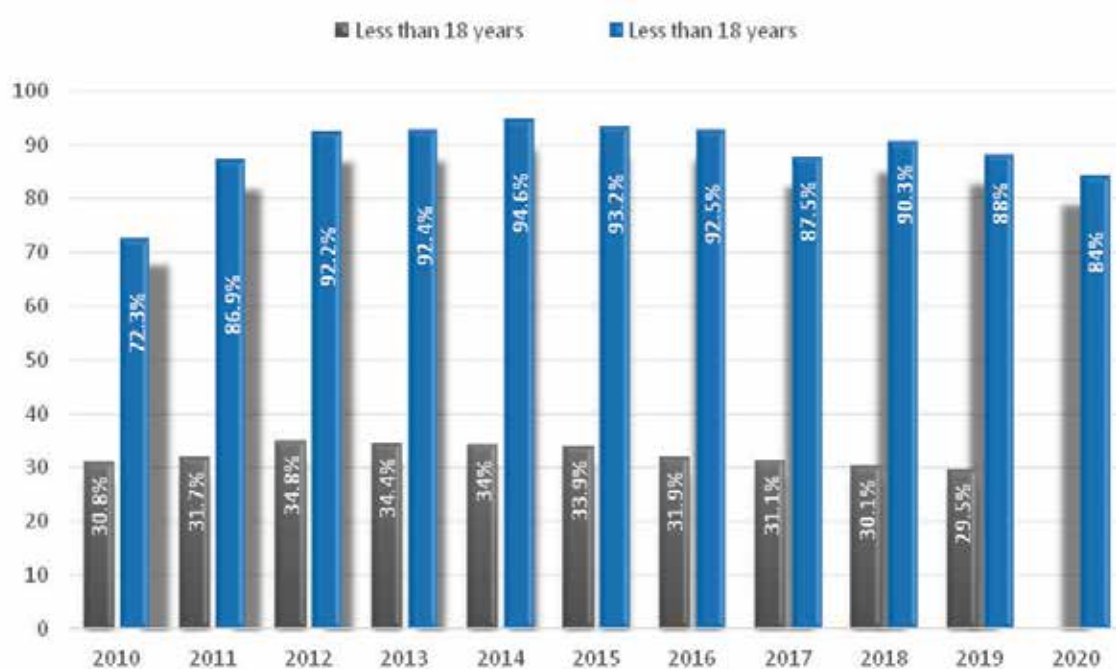
As discussed above, the EU indicator of housing cost overburden is defined as the percentage of the population living in a household where total housing costs (net of housing allowances) represent more than 40% of the total disposable household income (net of housing allowances).

For children aged up to 17 years old the percentage of population with a housing cost burden is 42.2% in total, for the non-poor population is 30.8% and for **the poor population is 84%**. In 2020, more than 10% of the EU-27 population lived in households that spent 40% or more of their disposable income on housing (i.e. were considered as facing housing cost overburden). Among children at risk of poverty,¹⁰⁷ this share was 29.5% across the EU 27 (data for the year 2019), with as high as 88% in Greece¹⁰⁸ (see Figure 3 below).

¹⁰⁷ The incidence of housing cost overburden was higher for tenants than for owners.

¹⁰⁸ Eurostat [ilc_lvho07a], <https://appsso.eurostat.ec.europa.eu/nui/submitViewTableAction.do>.

Figure 3 Housing cost overburden rate for children aged up to 17 years old at risk of poverty (low income) - Greece and EU-27 (2010-2020)



Note: Data 2020 only for Greece. / Source: Eurostat / from EU-SILC (ec.europa.eu)

Additionally, the incidence of housing cost overburden in Greece was not only higher for households with dependent children (37.6% in 2020), but it also exceeded respective rates for the general population (32.6% in 2020). **Of particular concern are single person households with or without dependent children (above 65%) and all types of households of two adults with one or more dependent children where the rates are above 37%** (see Table 4 below).

Table 4 Housing cost overburden rate by household type, Greece and EU-27 (2019/2020)

Household type	2019-2020	
	EL	EU27
Single person with dependent children	70.9%	16.6%
Two adults with one dependent child	45.9%	7%
Two adults with two dependent children	45.2%	6.6%
Two adults with three or more dependent children	40%	6.8%
Two or more adults with dependent children	39.4%	6.2%
Three or more adults with dependent children	25.9%	4.2%
Households with dependent children	40.2%	7.2%

Note: Data 2020 for Greece. / Source: Eurostat / Deep Dive Project Team analysis from EU-SILC (TESSI166).

At least **18.1% of poor children (below 60% of median equivalized income) in Greece suffered in 2020 from severe housing deprivation**,¹⁰⁹ having a difference of 11.8 percentage points with the non-poor children living in a household with severe household deprivation (see Table 5 below).

Table 5: Severe housing deprivation rate for children aged up to 17 years old by poverty status (2019/2020)

	2015		2016		2017		2018		2019		2020
	EL	EU 27	EL	EU 27	EL	EU 27	EL	EU 27	EL	EU27	EL
Below 60% of median equivalized income	13.7%	19.2%	14.8%	18.8%	14%	14.2%	16.1%	15.3%	14.5%	14%	18.1%
Above 60% of median equivalized income	6.3%	4.9%	5.6%	4.7%	5.3%	4.7%	6.1%	4.3%	7%	4.2%	6.3%
Total	8.2%	8%	8%	7.7%	7.4%	6.6%	8.4%	6.4%	8.6%	6%	8.9%

Note: Data for EU27 are estimated values. / Source: Eurostat (ilc_mdho06a).

The severe housing deprivation risk in Greece is more evident in the case of poor households with dependent children (52.3%), single parent families and large families. EU defines severe housing deprivation rate is defined as the percentage of population living in the dwelling which is considered as overcrowded, while also exhibiting at least one of the housing deprivation measures. Housing deprivation is a measure of poor amenities and is calculated by referring to those households with a leaking roof, no bath/shower and no indoor toilet, or a dwelling considered too dark. Households with dependent children are affected more by housing deprivation than the households without dependent children at any income quintile. Overall, the lowest income households are disproportionately affected (see Table 6 below).

¹⁰⁹ EUROSTAT, Glossary: Severe housing deprivation rate

Table 6: Severe housing deprivation rate for households with and without dependent children by income quintile in Greece (2020) and the EU-27 (2019)

EU 27			
Income Quintiles	Households with dependent children	Households with dependent children	Households without dependent children
1st quintile	52.3%	16.9%	16.4%
2nd quintile	21%	5.1%	6.6%
3rd quintile	6.2%	2%	3.5%
4th quintile	1.2%	0.9%	1.8%
5th quintile	0.4%	0.6%	0.9%

Source: Eurostat (2021) (ilc_mdho06q).

In addition, **children living in a household consisted by one single person are also more affected than other children.** More specifically the 12.8%, of children living in a household consisted by a single person face severe housing deprivation a twofold increase in the last five years, followed by the 11.5% of children living in a household consisted by two adults with three or more dependent children (see Table 5 below).

Table 5 Severe housing deprivation rate by household type (2015-2020)

	2015		2016		2017		2018		2019		2020
	EL	EU27	EL	EU27	EL	EU27	EL	EU27	EL	EU27	EL
Single person with dependent children	6%	8.2%	11.3%	8.3%	7.3%	7.6%	6.8%	6.6%	9.2%	6.5%	12.8%
Two adults with one dependent child	2.5%	4.1%	3.2%	4.1%	3.7%	3.5%	3.4%	3.7%	4.2%	3.1%	3.9%
Two adults with two dependent children	4.4%	4.1%	4.2%	4%	4.3%	3.5%	5.2%	3.4%	6.2%	3.3%	5.9%
Two adults with three or more dependent children	12.9%	11.5%	14.5%	11.2%	11.9%	9%	14.3%	9.1%	12.3%	9.6%	11.5%
Two or more adults with dependent children	8.9%	7.7%	8.3%	7.3%	7.6%	6.3%	8.3%	6.1%	8.7%	5.7%	8.4%

Source: Eurostat (2020) (ec.europa.eu)

In terms of **severe housing deprivation**, the rate for children living in a dwelling with a leaking roof, damp walls, floors or foundation or rot in window frames of floor was 12.5% in 2020. During the period 2010-2020 the indicator reached a high of 15.2% in 2010 and a low of 11.5% in 2019.

The respective rates for children having neither a bath, nor a shower in their dwelling and for children not having indoor flushing toilet for the sole use of their household are very low (below 0.5%), while the rate for children living in households considering their dwelling as too dark stood at 5.5% in 2020.

Table 7 Selected housing deprivation dimensions for children in Greece and the EU-27 (2010-2019)

	GREECE		EU-27	
	2020	2010-2020 trends	2019	2010-2019 trends
Children living in a dwelling with a leaking roof, damp walls, floors or foundation, or rot in window frames or floor [ilc_mdho01c]	12.5%	-18.4%	13.7%	-23%
Children having neither a bath, nor a shower in their dwelling [ilc_mdho02c]	0.2%	-50%	1.9%	-42.4%
Children not having indoor flushing toilet for the sole use of their household [ilc_mdho03c]	0.4%	-60%	2%	-46%
Children living in households considering their dwelling as too dark [ilc_mdho04c]	5.5%	-8.4%	4.9%	-30%

Source: Eurostat (2021)

In case of children aged up to 17 years old living **in households considering their dwelling as too dark, the percentage of low income households (below 60% of median equivalized income) is higher (7.6%) than the percentage of households above 60% of median equivalized income (4.9%).**

In Greece, children below 60% of median equivalized income (18.3%) amounts for a higher percentage affected by dwellings with leaking roof, damp walls, floors or foundation, or rot in window frames or floor are significantly more than the corresponding percent of all children in Greece (12.4%) who suffer from the abovementioned issues (see Table 8 below). In comparison with the EU27 average of 21% low-income children experiencing poor housing related living conditions, the rate low-income children in Greece is much lower.

Table 8 Children (aged up to 17 years old) living in dwelling with a leaking roof, damp walls, floors or foundation, or rot in window frames or floor in Greece and EU27 (2015-2020)

	2015		2016		2017		2018		2019		2020
	EL	EU 27	EL	EU 27	EL	EU 27	EL	EU 27	EL	EU 27	EL
Below 60% of median equivalized income	18.6 %	27 %	19.3 %	28.2 %	18.2 %	22.4 %	18.9 %	23.5 %	17.3 %	21 %	18.3 %
Above 60% of median equivalized income	12.6 %	14 %	11.7 %	14.2 %	9.6%	12.2 %	9.8%	12.8 %	9.9%	12 %	10.8 %

Source: Eurostat (ILC_MDHO01)

Apart of the above dimensions and in alignment with the ECG's recommendations, ELSTAT reported several other pointers with regard to housing deprivation. Notably, **the financial inability to provide adequate heating in winter is one of the most important, where the 39.1% amounts for poor households compared to a 12.4% for non-poor ones; leaving a significant amount of children with unmet heating needs** (see Table 9 below).

Table 9 Percentage (%) of households with dependent children in Greece with housing problems, distinguishing between poor and non-poor households (2020)

	Households		
	Total	Lower income	Above 60% of equivalized income
Vandalism and crime	18.1%	17.4%	18.2%
Financial inability to provide adequate heating in winter	17.1%	39.1%	12.4%
Environmental problems from industry or car traffic	20.2%	19.5%	20.4%
Noise from neighbors or the street (traffic, industry, etc.)	20.1%	19.2%	20.3%

Source: ELSTAT (2021)

In terms of children, **Greece had 38.9% of households with dependent children which were not able to keep home adequately warm.** Households of single parent with dependent children suffered even more – amounts for 42.5% of such households- in Greece as well as 36.3% of households of two parents with dependent children. In comparison to the average rate for EU27, rates of Greece

exceeds by far those of EU27. In some cases the rates of Greece are more than double the rates of EU27, especially children living in single-parent households and low-income families (see Table 10 below).

Table 10 Low-income households inability to keep home adequately warm in Greece and EU27 (2015-2020)

	2016		2017		2018		2019		2020
	EL	EU27	EL	EU27	EL	EU27	EL	EU27	EL
Single person with dependent children	62.8%	20.6%	57.5%	18.7%	38.9%	18.7%	49.5%	18.4%	42.5%
Two adults with three or more dependent children	53.6%	23.2%	46.8%	18.5%	46%	15.9%	34.6%	19.3%	36.3%
Households with dependent children	53%	22.2%	45%	19%	41%	19.4%	34.9%	18.4%	38.9%

Source: Eurostat (2020) (ilc_mdcs01)

Overcrowding

Shortage of space remains a concern for children

The percentage of population living in a dwelling with limited space amounts for 29% of total population, 25.8% for the non-poor population and 43.9% for the poor population. **Rates are significantly higher in the case of children aged up to 17 years old and amount to 43.2% for the total population, 38.4% for the non-poor population and 61.2% for the poor population.**¹¹⁰

Children at risk of poverty and migrant children in Greece are the most affected by overcrowding. The rate for children (less than 18 years) was 64.4% low-income (below 60% of median equivalized income) children and 45.6% of all children in 2020 who lived in the overcrowded properties in Greece, substantially higher rates than the EU average.

Overcrowding is also a key concern for migrant children across Europe, including Greece. **Greece in 2018 witnessed one of the highest overcrowding rates among EU Member States for foreign EU citizens (45%), and for foreign non-EU citizens (55%)** (See Table 11).¹¹¹ In 2019, at the EU-27 level, overcrowding rates

¹¹⁰ ELSTAT (2021)

¹¹¹ The right footnote is EUROSTAT, Overcrowding rate by age, sex and broad group of citizenship (HYPERLINK "

among the population aged 18+ years were 14.3 % for national citizens but noticeably higher for non-EU citizens (34.8%). Respectively in Greece it was 24.6% (for nationals) and 48.7% for migrants. As such, foreign citizens including children from non-member countries were more likely to be living in an overcrowded or severely deprived household.

Table 11 Overcrowding rate for children (less than 18 years old) in Greece and EU27 (2016-2020)

	2016		2017		2018		2019		2020
	EL	EU27	EL	EU27	EL	EU27	EL	EU27	EL
Below 60% of median equivalized income	51.6%	43.2%	53.5%	40.1%	55.8%	40.2%	63.2%	40.8%	64.4%
Total	36.8%	24.9%	38.8%	24.5%	40%	24.1%	42.8%	24.4%	45.6%

Source: Eurostat (2021) (ILC_LVHO05A).

In comparison within different household types, **the most overcrowded households in Greece were those with dependent children – 46.5% in 2020; almost double the EU27 average - 24.5%** in 2019. Two parents with three or more dependent children (62.7%), three or more adults with dependent children (69.5%), two or more adults with dependent children (46.6%) and single parent with dependent children (42%) had the highest rate in overcrowding in Greece (see table 12 below). In addition, in the last 5 years we have seen a major increase in overcrowding rates, with multifamily households taking the lead.

Table 12 Overcrowding rate by household type - total population in Greece and EU27 (2016-2020)

	2016		2017		2018		2019		2020
	EL	EU27	EL	EU27	EL	EU27	EL	EU27	EL
Single person with dependent children	36.5%	26.8%	35.4%	25.9%	34.8%	25.1%	40.3%	24.4%	42%
Two adults with one dependent child	12.2%	15.8%	13%	15.3%	16%	14.8%	17.8%	14.8%	18.6%
Two adults with two dependent children	27.2%	16.8%	29.1%	16.9%	30.9%	16.3%	33.4%	16.7%	34.4%
Two adults with three or more dependent children	61.3%	30.3%	63.3%	30.6%	65.2%	31.1%	62.1%	32.4%	62.7%
Two or more adults with dependent children	39.2%	25.3%	41%	24.9%	42%	24.4%	43.9%	24.6%	46.6%
Three or more adults with dependent children	71.5%	46.5%	72.5%	45.3%	70.7%	44%	68.1%	43.7%	69.5%
Households with dependent children	39.1%	25.4%	40.8%	25%	41.7%	24.4%	43.8%	24.5%	46.5%

Source: Eurostat (2020) (ILC_LVHO05B)

Access to adequate housing of Roma children

The EU-MIDIS II survey results, while outdated and derived from a small sample of the Roma population in Greece highlight the insufficient space and housing deprivation as a key challenges for the Roma households in Greece (see Table 13).

Table 13 Average number of rooms per person in the household, Roma and general population - Greece (2016)

Roma	General population
0,5	1,2

Note: Based on the mean value of number of rooms per person in the household (without kitchen); for the general population, based on Eurostat, EU-SILC 2014, [ilc_lvho03]. / Source: FRA, Second European Union Minorities and Discrimination Survey (EU-MIDIS II) 112 Roma, 2016

Table 14 Housing deprivation rates, Roma and general population - Greece (2016)

Indicator	Roma	General population (EU-SILC 2020)(eurostat)
Households without tap water inside the dwelling	9%	Na
Households living in dwellings without a toilet and shower or bathroom inside the dwelling	29%	0.1%
Households living in: a dwelling with a leaking roof, damp walls, floors or foundation, or rot in window frames of floor	37%	12.3%
Households living in dwellings considered too dark	18%	5.5%

Source: FRA, Second European Union Minorities and Discrimination Survey (EU-MIDIS II) Roma, 2016, <https://fra.europa.eu/en/publication/2016/second-european-union-minorities-and-discrimination-survey-roma-selected-findings>.

In conclusion, evidence points clearly to specific groups of children in need of prioritization, notably:

- **Children of low income households**, primarily from single parent families and children from rural areas are disproportionately affected, demonstrating the highest percentage of severe housing deprivation and unmet needs. Most notably, for children aged up to 17 years old **the percentage of poor population with a housing cost burden was 88%, almost triple the EU average.**
- **Unaccompanied and migrant children** remaining in informal/ precarious housing conditions are particularly vulnerable, despite the recently established mechanism for their referral to accommodation;
- **Significant share of Roma housing is insecure and overcrowded with detrimental effects for their children.** There is a higher exposure of Roma households to threats to security of tenure, since home ownership is lower

¹¹² FRA, *Second European Union Minorities and Discrimination Survey (EU-MIDIS II) Roma*, 2016, <https://fra.europa.eu/en/publication/2016/second-european-union-minorities-and-discrimination-survey-roma-selected-findings>.

among the Roma population. Evidence also point to racial discrimination of Roma population in housing while also appearing reportedly less informed about policies and institutions that could assist them.

- **Children at risk of poverty and migrant children in Greece are the most affected by overcrowding.** The rate for children (less than 18 years) was 64.4% low-income (below 60% of median equivalized income) children and 45.6% of all children in 2020 who lived in the overcrowded properties in Greece, substantially higher rates than the EU average

The above groups are demonstrating the widest gaps in terms of unmet needs and barriers due to a web of institutional and structural challenges, examined extensively below.

B. Institutional Challenges

The enabling institutional and policy framework

Legal definition of homelessness

Homeless persons are institutionally defined by Greek law¹¹³ as a vulnerable group in need of specific and targeted social protection measures. The state holds the primary legal responsibility¹¹⁴ to provide primary (prevention), secondary (therapeutic care) and tertiary (specialized care) social care while it is foreseen that secondary social care provides accommodation or closed care services.¹¹⁵ Meanwhile, primary social care provided at a municipal level serve as the entry point for children in need of housing into the system.

Persons who do not hold a legal residence status in Greece are excluded by definition, leaving hundreds of people currently unaccounted. Persons living in institutions or other forms of institutional care are included yet no specific attention is paid to children. It is worth noting that in 2020 the legal definition of homeless persons in terms of access to Guaranteed Minimum Income (GMI) was broadened to include also women residing in shelters for victims of violence.¹¹⁶ The law serves to reiterate the Government's commitment to implement complementary programmes but does not adequately fulfill and protect the general right of homeless persons, including children, for effective access to adequate housing.

Both the United Nations Declaration of the Rights of the Child (1959) and the Convention on the Rights of the Child (1989) address the special housing rights of children. Article 27 of the Convention requires States parties to take appropriate measures to assist parents and others responsible for the child to implement the right to an adequate standard of living, and: in case of need (to) provide material

¹¹³ Law 4052/2012, art. 29, par. 1 and 2. "1. The homeless are recognized as a vulnerable social group to which social protection is provided. Homeless persons are defined as all persons legally residing in the country, who lack access to safe and adequate accommodation, owned, rented or freely released, and which meets the necessary technical specifications and has the basic water supply and electricity services. 2. The homeless include particularly those living in the streets or shelters and those who are hosted, out of need, in institutions or other forms of institutional care".

¹¹⁴ Laws 2345/1995 and 2646/1998 (art. 3).

¹¹⁵ L. 2646/1998, art. 3

¹¹⁶ Law 4756/2020, Section B, art. 4.

assistance and support programmes, particularly with regard to nutrition, clothing and housing.

Despite the international community's continuous efforts towards the importance of full respect for the right to adequate housing, there remains a significant gap between the standards set in article 11 (1) of the Covenant and the situation prevailing in many parts of the world, including Greece.

Greece for instance, is still among the few EU Member States without a national public/ social housing policy, particularly after abolishing in 2013¹¹⁷ the Workers' Housing Organization (OEK),¹¹⁸ for people and children unable to meet their housing needs. The country is also not benefiting from a comprehensive policy framework to prevent and combat homelessness. To the contrary, at an ad-hoc basis, fragmented programmes and subsequent support measures addressing acute housing needs of specific target groups are filling the gaps. The draft (June 2021) National Strategy of Social Integration and Poverty Reduction¹¹⁹ is an important step as it includes specific policy measures on housing, yet limited to the provisions of one specific programme - Housing and Work - failing to provide a cohesive policy framework for adequate and effective housing.

The concept of adequacy is particularly significant in relation to the right of housing since it serves to underline a number of factors which must be considered while determining whether particular forms of shelter can be considered to constitute "adequate housing" for the purposes of the Covenant. The characteristics of the right to adequate housing are clarified mainly in the United Nations Committee's on Economic, Social and Cultural rights general comments [No. 4 \(1991\) on the right to adequate housing](#) and [No. 7 \(1997\) on forced evictions](#) and **revolve around:**

- (a) *Legal security of tenure*
- (b) *Availability of services, materials, facilities and infrastructure*
- (c) *Affordability:* Personal or household financial costs associated with housing should be at such a level that the attainment and satisfaction of other basic needs are not threatened or compromised.
- (d) *Habitability:* Adequate housing must be habitable, in terms of providing the inhabitants with adequate space and protecting them from cold, damp, heat, rain, wind or other threats to health, structural hazards, and disease vectors.
- (e) *Accessibility:* Adequate housing must be accessible to those entitled to it. Disadvantaged groups must be accorded full and sustainable access to adequate housing resources.
- (f) *Location:* Adequate housing must be in a location which allows access to employment options, health-care services, schools, childcare centers and other social facilities.

¹¹⁷ Law No. 4144/2013

¹¹⁸ OEK was a public agency in the MoLSA that provided privately owned social dwellings (built by the OEK or purchased through loans in the free market) to manual workers and private sector employees affiliated to relevant national social insurance funds.

¹¹⁹ Ministry of Labour and Social Affairs, 2021, Public consultation of the National Strategy of Social Integration and Poverty Reduction. Available at: <http://www.opengov.gr/minlab/wp-content/uploads/downloads/2021/06/Εθνική-Στρατηγική-για-την-Κοινωνική-Ενταξη-και-Μείωση-της-Φτώχειας.pdf>

Access of children to housing programmes and housing support measures in Greece

Even though there are not any child specific social programmes or measures related to housing, children's presence in the household is often positively considered in terms of eligibility criteria.

In essence, the programs currently in place are:

The programme "**Housing and Work**"¹²⁰ is monitored by the Ministry of Labour and Social Affairs (MoLSA) and implemented in collaboration with the Municipalities, Legal Persons under Public Law (NPDD) and certified Legal Persons under Private Law (NPID) subject to submission of relevant funding applications.¹²¹ The program is implemented in municipalities with more than 100,000 residents, which in practice means that homeless persons and children's needs living in rural or remote areas below the above threshold are unmet. The intervention focuses on the reintegration of persons and families experiencing homelessness and its provisions include a. rent subsidy for a period of 24 months, b. activation, training and job promotion services, c. social support services. The programme targets persons at risk of housing deprivation, in particular:

- a) families that are housed in hostels of transitory accommodation of homeless and dormitories,
- b) families and persons registered from the municipalities' social services as homeless people that living in the streets or in indecent housing,
- c) women and their dependents staying in shelters for women experienced violence and they don't have access to housing, finally,
- d) persons that previously hosted in rehabilitation structures and presently lacking access to housing.

The eligibility criteria¹²² for the programme do not include special provisions for families with children and the presence of children is not considered as such a weighted criterion. However given that a social investigation report by the competent social service of the municipality is required, families with children may be prioritized due to social reasons. As of January 2021,¹²³ 412 households and 633 beneficiaries were being benefited from the program. Among them, 161 children from 96 families, 65 of which are single parent ones and 37 young adults formerly residing in child care institutions.

In terms of local-level initiatives, since October 2020, 35 Greek municipalities have endorsed the "Homeless Bill of Rights", in the framework of a campaign supported by the European Federation of National Organizations Working with the Homeless (FEANTSA) which Greece also joined as a member in 2021. While the bill reaffirms

¹²⁰ Law 4756/2020, article 15. This Programme is successor of the 'Housing and Reintegration' Programme that was implemented over the period July 2015 to February 2019 to provide housing support and social reintegration through labour integration services to 1,200 homeless people.

¹²¹ Law 4756/2020, article 15, par. 5 and Joint Ministerial Decision Δ13/οικ. 42815/2021, ΦΕΚ 2788/Β/30-6-2021, art. 2.

¹²² Joint Ministerial Decision Δ13/οικ. 42815/2021, ΦΕΚ 2788/Β/30-6-2021

¹²³ Data provided by the MoLSA

the local governments' commitment to respect the rights of homeless people, it does not include any specific provisions for children.¹²⁴

The **housing subsidy** introduced in 2017 and implemented by MoLSA at national level since January 2019,¹²⁵ represents a national measure to address unmet housing needs. The programme succeeded small scale, ad-hoc interventions targeting only specific categories of the population.¹²⁶ The Housing Subsidy is a rent allowance¹²⁷ for households living in rented primary residences,¹²⁸ provided that they legally and permanently reside in Greece¹²⁹ while there are also income¹³⁰ and assets related eligibility¹³¹ conditions.

The framework gives special and favorable treatment for single parent families and for households with unprotected children in terms of a) the annual income thresholds¹³² for eligibility for the programme and b) the amount of the subsidy granted.¹³³ The total amount of this subsidy cannot exceed €210 per month, regardless of the composition of the household.¹³⁴ As of 30 August 2019, of the 285,564 approved applications 51,3% concerned households with 3 or more members.¹³⁵ In 2020 76% of the households benefiting from the programme had annual income below the threshold of 10.500 Euro while 57,46% (126.067) of the total number households (242.837) benefited were households with at least one child.¹³⁶

The **Guaranteed Minimum Income (GMI)** also includes homeless persons as beneficiaries. However, in the context of GMI a more specific definition of homeless persons is introduced, making reference to specific categories of persons and introducing criteria for a person to be considered homeless under the GMI (i.e. registration by the social services of the municipality or use of relevant services such as overnight shelters, accommodation hostels and shelters for women victims of

¹²⁴ <https://www.feantsa.org/en/news/2021/02/25/the-endorsement-of-the-homeless-bill-of-rights-has-taken-a-whole-new-dimension-as-35-greek-municipalities-have-recently-endorsed-the-bill?bcParent=26>

¹²⁵ Law 4472/2017 art. 3 and is regulated by the Ministerial Decision No. 71670/2021, 29-9-2021.

¹²⁶ Especially for the elderly, programmes such as the Housing Assistance or housing programmes that were attached to social security rights.

¹²⁷ The benefit amount for the beneficiary (the applicant) is defined at 70€ per month. For every additional member of the household, there is an increase of 35€ per month. The overall limit of the amount is 210€ per month irrespective of the composition of the household.

¹²⁸ Even though the law extends the housing subsidy to households paying mortgage loans for their primary residence, the implementing Ministerial Decision is only foreseen the subsidy for households renting their primary residence.

¹²⁹ Law 4659/2020, art. 17. Eligible are Greek citizens that reside permanently in Greece, EU citizens as well as citizens of the countries that belong to the EFTA countries and reside permanently in Greece, refugees, stateless persons, beneficiaries of subsidiary protection for whom the requirement is to reside legally and permanently five years in the country. Eligible are also third country nationals, under the condition that their permanent residence in the country equals twelve year.

¹³⁰ The total income of the household cannot surpass the 7.000€ for a single person household. Following the current structure of the Greek welfare allowances, for every additional person the income threshold is increased by 3.500€. The overall calculated income could not surpass the 21.000€ per year, irrespective of the household's composition.

¹³¹ The total taxable value of the single-person household's property cannot be over 120,000€, increased by 15,000€ for each additional member of the household (including children), while the maximum total taxable value of the property cannot exceed the amount of €180,000. In addition, bank deposits should not exceed a specific amount that is calculated based on a math formula starting from the amount of 7,000€ for a single-person household.

¹³² The additional amount of 3.500€ is added to the income threshold applicable.

¹³³ The additional amount of 35€ per month is added to the eligible amount.

¹³⁴ <https://ec.europa.eu/social/BlobServlet?docId=21389&langId=en>

¹³⁵ Organization for Welfare Benefits and Social Solidarity, 2019, Statistical data, Housing subsidy. Available at: <https://www.epidomastegasis.gr/pub/Home/StatisticsReports>

¹³⁶ Ministry of Labour and Social Affairs, OPEKA

violence).¹³⁷ These categories of persons identified as homeless can benefit from the program, however there are neither specific provisions foreseen for families with children nor for their equitable treatment in terms of eligibility. In addition, the eligibility conditions are not taking into account the adequacy dimension of the house (precarious access to housing or requirement to meet the required technical specifications and availability of electricity and water supply) as stipulated by the law defining homelessness.¹³⁸

Presently, there are two housing related allowances (fuel benefit, Social Residential Electricity Tariff) relevant to the “adequacy” dimension of housing as it’s legally described.¹³⁹

- I. The **Fuel Benefit** was introduced in 2011,¹⁴⁰ currently running under the Ministry of Finance. Income eligibility conditions take into account the presence of children in the household as the income thresholds are increasing proportionally to the number of children.¹⁴¹ The amount is assessed based on a calculation of the heating load necessary to heat the building granted against climate related data for a predetermined amount of months.
- II. The **Social Residential Electricity Tariff (KOT)** measure was introduced to protect the most vulnerable electricity consumers in need of support (people at risk of energy poverty).¹⁴² The policy is implemented by the Public Electricity Company (DEI) and eligible households are those enrolled to the Guaranteed Minimum Income (persons at risk of extreme income poverty) (category A) while eligibility for the second category (B) is determined based on the annual income thresholds,¹⁴³ the value of the immovable assets owned by the household, and the prerequisite not to fall under the luxury tax category.

For households found eligible for the measure, a discount tariff¹⁴⁴ is applied up to specific limits,¹⁴⁵ every four months of invoicing consumption. KOT is child sensitive in terms of both the annual income threshold for eligibility for the programme which is commensurate to the number of children and the quarterly consumption limit.

¹³⁷ Law 4756/2020, Section B, art. 4. “Homeless: people living in streets or in unsuitable accommodation, provided that they are registered by the social services of the Municipalities or Community Centers or use overnight shelters, transitional shelters and shelters for women victims of violence operating in the Municipalities...”.

¹³⁸ Law 4052/2012, art. 29, par. 1 and 2. (i.e. “housing... that meets the necessary technical specifications and has the basic water supply and electricity services”).

¹³⁹ Law 4052/2012, art. 29, par. 1 and 2.

¹⁴⁰ Law 3986/2011, article 36(8b) (as amended by article 79 of the Law No. 4756/2020) and is regulated by the Joint Ministerial Decisions No. A.1275/17.12.2020 and A.1012/235/25.01.2021.

¹⁴¹ For every additional child the amount is increased by 2.000€. For a single parent family the income threshold is increased up to 22.000€, with an increment of 2.000€ for every child after the first one.

¹⁴² It was established by the Decision of the Minister of Environment, Energy and Climate Change No. Δ5-H/VB/Φ29/16027/6.8.2010, as replaced by the Ministerial Decision No. 242/1.2.2018, which inter alia abolished the decision of the Commission for Prices and Income according to which a special discount tariff had been established for large families.

¹⁴³ Income thresholds are increased based on the number of members in the household including children. For example, annual income thresholds for single parent family with one minor is 13.500, for two adult members and one minor or single parent family with two minors 15.700, for two adults and two minors or single parent family with three minors 18.000. The relevant income thresholds are increased by 2.250 € for every additional minor member.

¹⁴⁴ 0,075€/kWh for the category A and 0,045€/kWh for the category B.

¹⁴⁵ For example, for households comprised by two adults and two minors or single parent family with three minors the consumption limit that the discuss can be applied is 1.800 kWh.

Furthermore, persons on the “Vulnerable Electricity Customers Registry” are entitled to protection against disconnections due to outstanding debts during the winter period (November to March) and the summer period (July and August).¹⁴⁶

The **provision of dwellings to vulnerable** families that belonged to the abolished in 2013 Workers’ Housing Organization (OEK) which are still vacant or not allocated, can be also considered as an ad-hoc housing programme. The Greek Public Employment Agency (Manpower Employment Organization - OAED) became a universal successor to the abolished body of OEK and in that context based on a legal provision in 2020,¹⁴⁷ free dwellings are provided to vulnerable worker families or registered unemployed or pensioners previously eligible under the abolished OEK. Among others,¹⁴⁸ a basic eligibility criterion is the presence of dependent children in the family. However, that housing policy measure cannot be evaluated since it is not clear what the relation of this programme is with the overall national housing policy while its implementation and the number of the available residencies for the scheme remains unknown.

The legal **protection of primary residence** in Greece was initiated in 2010¹⁴⁹ to support the heavily indebted households due to the prevailing financial crisis at that time. Following a series of relative legal amendments, the original law for the protection of the primary residence was replaced in April 2019 by a new law¹⁵⁰ allowing for: firstly) a debt settlement due to arrears to financial institutions and with an additional provision¹⁵¹ and secondly) a subsidy of 9 months duration for the regulated debts to support households affected by COVID-19 pandemic. This measure is not child sensitive as children are only counted for the increase of the annual family income eligibility threshold.¹⁵² In terms of the additional provision of the 9 months subsidy, the fact that the assessment on eligibility was based on income from the previous year prevented many people from effectively using the benefit, even though they experienced a significant income decline as a result of the COVID-19 pandemic.¹⁵³

More recently, since June 1st 2021 a new provision¹⁵⁴ on insolvency is into effect whereby an out-of-court debt settlement mechanism is foreseen for debts in financial institutions, public sector and social security institutions which is considered to also apply to households with mortgage for a residence. However, this measure again fails to address the needs of children.

¹⁴⁶ Baptista, I., Marlier, E., Spasova, S., Peña-Casas, R., Fronteddu, B., Ghailani, D., Sabato, S. and Regazzoni, P. (2021), Social protection and inclusion policy responses to the COVID-19 crisis. An analysis of policies in 35 countries, European Social Policy Network (ESPN), Luxembourg: Publications Office of the European Union.

¹⁴⁷ The Programme was introduced by article 62 of the Law No. 4756/2020 and is regulated by the Ministerial Decision No 4317/Δ2/470/11.3.2021

¹⁴⁸ Other eligibility criteria include: the existence of paid contributions to OEK by employers or pensioners who were insured for a period of 900 days before the end of 2020, lack of assets, being beneficiaries of the GMIS

¹⁴⁹ Law 3869/2010, widely known as “Katseli law”.

¹⁵⁰ Law 4605/2019, art. 68-84.

¹⁵¹ Law 4714/2020, art. 71-83.

¹⁵² “The income threshold of 12,000 euros is increased by 5,000 euros for each dependent member and up to three dependent members”.

¹⁵³ Baptista, I., Marlier, E., Spasova, S., Peña-Casas, R., Fronteddu, B., Ghailani, D., Sabato, S. and Regazzoni, P. (2021), Social protection and inclusion policy responses to the COVID-19 crisis. An analysis of policies in 35 countries, European Social Policy Network (ESPN), Luxembourg: Publications Office of the European Union.

¹⁵⁴ Law 4738/2020 “Debt Settlement and Second Chance Provision”.

Emergency/ temporary accommodation services are provided by the **Shelters for Women Victims of Violence and their children**. Currently, there are 20 Women's Shelters throughout the country¹⁵⁵ operating in municipalities under the Ministry of Labour and Social Affairs (General Secretariat for Family Policy and Gender Equality – GSFPGE)¹⁵⁶ and are providing: accommodation of a temporary and transitional character for up to three months, while additional stay is decided by the management, daily meals and psychosocial services. Children are eligible to enroll with their mothers under specific age conditions: girls up to 18 years of age; boys up to 12 years of age. Between November 2019 and October 2020 shelters accommodated in total 269 women and 270 children.¹⁵⁷

In addition, the policy framework provides for the establishment of specific types of structures for homeless persons such as **open day homeless centers, dormitories, transitional accommodation shelters, and supported independent living apartments** that usually provide temporary accommodation and other social services.¹⁵⁸ In general, no special provisions for the accommodation of children in these structures are foreseen: apart from single parent families with children and families with children in emergency conditions prioritization in transitional accommodation shelters and in supported independent living apartments.¹⁵⁹ The total capacity of these accommodation structures is 1.144 places.¹⁶⁰ During COVID-19 pandemic period, it was also foreseen that municipalities would establish dormitories and transitional accommodation shelters for the housing of homeless and other vulnerable groups and that until these structures are established, accommodation can be temporarily provided in tourist facilities whose operation has been suspended due to COVID-19.¹⁶¹

Specific groups of children in need in terms of access to housing

Roma children

Roma housing in Greece has been addressed in policy since the mid-1980s and more responsively throughout the 1990s and 2000s when residential development plans and initiatives,¹⁶² and EU-funded projects towards housing solutions for the Roma have been implemented in certain geographical areas by the Greek state.¹⁶³

¹⁵⁵ 18 shelters operate under the auspices of their respective municipality while two under the National Centre for Social Solidarity (General Secretariat for Family Policy and Gender Equality, 1st Annual Report on Violence Against Women, 2020).

¹⁵⁶ Law No. 4604/2019

¹⁵⁷ General Secretariat for Family Policy and Gender Equality, 1st Annual Report on Violence Against Women, 2020, p. 29.

¹⁵⁸ Joint Ministerial Decision Δ23/ οικ.19061–1457/2016.

¹⁵⁹ Joint Ministerial Decision Δ23/ οικ.19061–1457/2016, art. 7, par. 2 and art. 8, par. 2.

¹⁶⁰ Greece's reply to the letter from the Special Rapporteur on extreme poverty and human rights and the Special Rapporteur on adequate housing, dated 21 June 2021, p. 2.

¹⁶¹ Legislative Act of 13-4-2020, art. 25.

¹⁶² Examples of housing projects developed in the Municipalities of Karditsa, Thiva, Kalamata are presented by M. Kallikouni (Kallikouni, M. *Rethinking the Housing of the Otherness; Roma Housing in Greece*, retrieved on 18-10-2-21 in https://www.academia.edu/30832817/Rethinking_the_Housing_of_the_Otherness_Roma_Housing_in_Greece

¹⁶³ In 1998, the Public Corporation of Urban Planning and Housing (DEPOS) conducted a survey and produced the first large-scale mapping and classification of different types of Roma settlements in Greece (*National Strategy Framework for the Roma*, Ministry for Employment, Social Security and Welfare, 2011). Based on this survey, DEPOS also produced a Model Urban Design for Residential Development for Permanent Accommodation of Roma Population in Greece, aiming to improve housing conditions through a model plan for the design of new Roma settlements. (Kallikouni, M. *Rethinking the*

Since 2001 the implementation of a housing policy for the Roma in Greece becomes one of the strategic objectives on Roma inclusive policy design, initially through the Integrated Action Program for the Social Inclusion of Greek Roma (2001-2008) and later on through the National Strategy for Social Inclusion of Roma (2011-2020) and the forthcoming National Strategy for Social Inclusion of Roma (2021-2030).

The housing policy on Roma in Greece has been geared towards three main axes:

- (a) relocation/resettlement schemes of Roma populations to organized settlements (mostly temporary but in certain cases with the forward planning of Roma acquisition of property in-site primarily through loans),
- (b) and development schemes in existing settlements for the improvement of infra-structure/hygiene facilities,¹⁶⁴ and
- (c) acquisition of housing through loans and rent subsidy schemes for the relocation of Roma from existing settlements to autonomous housing aiming at their gradual integration within society.

In 2017, in view of Roma housing improvement measures the former Special Secretariat for Roma Social Inclusion adopted Article 159 of Law 4483/2017 which regulates (a) the procedures for the creation of Organized Areas for Temporary Relocation (b) for the Improvement of Living Conditions, in particular Hygiene Structures and Environmental Hygiene Conditions for special social groups. In accordance with Article 159 of Law 4483/2017, Joint Ministerial Decisions have been issued to determine the terms and conditions that regulate technical issues and implementation procedures for the temporary relocation of special social groups, including the Roma.¹⁶⁵

Reliable data on Roma housing programs in Greece tend to be fragmented and scarce. Nevertheless, governmental and EU assessment documents and reports as well as data provided by qualitative fieldwork-based research demonstrate that housing measures for 110.000 Roma implemented so far have only provided temporary solutions and have had a limited effect towards processes of 110.000 Roma children's social inclusion.¹⁶⁶

There are various reasons for limited results of housing measures thus far, ranging from the perpetuating problem of Roma proper documentation, the Roma mistrust

Housing of the Otherness: Roma Housing in Greece, retrieved on 18-10-2-21 in https://www.academia.edu/30832817/Rethinking_the_Housing_of_the_Otherness_Roma_Housing_in_Greece

¹⁶⁴ According to the 3rd National Report on the Implementation of the European Social Charter submitted by the General Secretariat for Social Solidarity and Fight against Poverty of the Ministry of Labour, in the framework of the National Strategy for Roma Inclusion (2011-2020), 12 Municipalities across Greece have applied for interventions funding on the basic infrastructures in type 1 and 2 settlements that correspond to the mapping and the accompanied typological classification of the areas where the Roma live produced by the former Special Secretariat.

<https://rm.coe.int/greece3-en-simplified-report-collective-complaints/16809ce324>

¹⁶⁵ For example, in accordance with Article 159 of Law 4483/2017 the following municipalities shall immediately initiate the implementation procedure: 1) The Municipality of Farsala for the relocation of 31 Roma families under the Joint

Ministerial Decision No.2587/EF 352, OG2199-07.06.2019. 2) The Municipality of Katerini under the Joint Ministerial Decision No.30151/EF434, OG2887/B/5-7-2019 and OG3811/B'.

¹⁶⁶ See for example: a. *National Strategy Framework for the Roma*, Ministry for Employment, Social Security and Welfare, 2011, b.

https://ec.europa.eu/info/sites/default/files/assessment_greece_national_strategy_2012_en.pdf

https://ec.europa.eu/info/sites/default/files/assessment_greece_national_strategy_2014_en.pdf

against municipal authorities due to a history of threats of eviction or forced evictions of Roma from their settlements and failures of municipal authorities to fulfill agreements through providing replacement housing with subsidized rent for Roma to shortcomings in needs assessment that acknowledge local particularities (i.e. Roma relationships with non-Roma neighbors, Roma intra-group antagonisms) and Roma cultural specificities (i.e. Roma family organization and household composition, type of employment),¹⁶⁷ unsubstantiated budgeting and resource mobilization, absence of planning and design that includes participation of targeted Roma and non Roma populations as part of wider urban development projects, lack of transportation facilities and easy access to city centers.

According to the mapping of the Operational Plan for the Social Integration of Roma,¹⁶⁸ 104.210 Roma live in degraded and often segregated conditions across 354 locations, residing in three different types of residencies; settlements, locations with mixed houses and settlements, and impoverished areas. 36.336 persons are living in 119 type III impoverished areas where “non-acceptable living conditions prevail such as huts, makeshift shelters and there is lack of basic infrastructure” who can be considered as homeless based on the legal definition of homelessness. In addition, part of the 59.292 persons living in 159 type II mixed settlements where houses are mixed with temporary makeshift shelters or containers and there is partial access to basic infrastructure (electricity, water supply, roads), may be also considered homeless.¹⁶⁹ This means at minimum 36.336 Roma persons can be considered homeless while this number may be much higher, close to 95.500 persons.

However, the exact number of children included in that population is not available, but it can be estimated that the number of children affected by the lack of access to housing is high as they comprise a relatively big percentage of Roma population. In addition, data for the Second Survey on Minorities and Discrimination in EU (2016) (EU-MIDIS II) demonstrate the challenging access to adequate housing for Roma population in Greece.¹⁷⁰

Different accommodation modalities are provided by the Ministry of Migration and Asylum based on the reception stage and the legal status (**asylum seeker or beneficiary of international protection**) of the third country national or stateless persons while there are separate provisions for **unaccompanied children**. During reception and identification stage, housing is included in the “material reception

¹⁶⁷ Daskalaki, I. (2010/2011) “Attachement aux lieux, à l’espace et aux affiliations familiales chez les Tsiganes d’Athènes” [“Dealing with their Eviction from their Settlement: Attachment to Place, Space and Kin Affiliations among Gypsies in Athens”],¹⁶⁷ *Etudes Tsiganes*, 44-45, 62-83 & 210-229

¹⁶⁸ Ministry of Labour and Social Affairs, 2017.

¹⁶⁹ Ministry of Labour and Social Affairs, 2017, Operational Plan for the Social Integration of Roma, p.

20. Available at: https://egroma.gov.gr/wp-content/uploads/2019/06/LOW-EPIXEIPHSIAKO_SXEDIO_DRASHS_ROMA.pdf

¹⁷⁰ Based on that data, only 21% of Roma population are never unable to pay rent or mortgage, only 11% are never unable to pay utility bills, 55% cannot keep their home adequately warm, 29% don’t have an indoor flushing toilet, 33% don’t have an inside shower or bathroom, 19% don’t have any kind of heating facility, 18% reside in too dark accommodation, 20% have too much noise from neighbours, 37% have leaking roof or dump, 92% experience overcrowding, 70% have owned accommodation and only 1% have rental from council/ social housing while segregation is very high as 78% declared that all of most neighbourhood is of the same ethnic background. Available at: <https://fra.europa.eu/en/publications-and-resources/data-and-maps/survey-data-explorer-second-eu-minorities-discrimination-survey>

conditions” in various types of facilities.¹⁷¹ These facilities are supposed to provide distinct spaces for the stay of persons belonging to vulnerable groups, such as children.¹⁷² In terms of accommodation of applicants for international protection, there are special provisions in place foreseeing that families should be provided housing in the same space and that criteria such as vulnerability (children are defined as vulnerable group) or age, should be considered during the decisions relevant to accommodation.¹⁷³ During the referral and movement stage of the reception and identification procedure, it is provided that the best interest of the child and the family unit should be also considered¹⁷⁴ and that an adequate standard of living should be ensured for the development of the child.¹⁷⁵

Unaccompanied children

Despite the fact that the legal framework considers refugee and migrant children a vulnerable group,¹⁷⁶ there is specific focus on the **unaccompanied children** (UAC) due to their special condition. The competent authority to ensure housing for the UAC is the Special Secretary for Unaccompanied Minors (SSUM) in the MoMA¹⁷⁷ and is responsible for the referral and escorting of UAC at accommodation facilities in addition to managing the accommodation requests and available places.¹⁷⁸ An accommodation request is usually made for UAC temporarily based in RICs, in pre-removal detention centers, in police facilities or for UAC that are reported as homeless or living in precarious conditions. It is also foreseen that changes in the accommodation of UAC should be limited, strictly on a need basis.¹⁷⁹

All necessary steps are taken for the placement of the child in a shelter for long term accommodation for unaccompanied minors, or in a safe zone within an open camp,¹⁸⁰ or in a hotel while if an adolescent is above 16 years old and meets all prerequisites, may gradually be admitted to a supervised independent living apartment (SIL).¹⁸¹ In 2021, the Special Secretariat for the Protection of Unaccompanied Minors together with the Ministry of Citizen’s Protection proposed the abolishment by law¹⁸² and practice of protective custody which cannot be enforced for unaccompanied minors due to the absence of safe or known

¹⁷¹ Law 4636/2019, art. 41. Material reception conditions include “provision of housing, food and clothing, in kind or in the form of financial aid or vouchers, or a combination of the three, as well as an allowance for daily expenses”.

If material reception conditions are provided in kind can take the form of stay in: a. facilities in the borders where international protection application is examined, b. accommodation centers, c. apartments or hotels. In that context, the legal framework provides for the establishment of Regional Services of the Reception and Identification Service in the Ministry of Migration and Asylum namely: a) “Reception and Identification Centers” (RICs), b) “Controlled Facilities of Temporary Accommodation for Asylum Seekers” and c) “Closed Controlled Facilities”.

¹⁷² Law 4825/2021, art. 29, par. 2.

¹⁷³ Law 4636/2019, art. 56, par. 2.

¹⁷⁴ Law 4636/2019, art. 13, par. 7.

¹⁷⁵ Law 4636/2019, art. 59, par. 1.

¹⁷⁶ Law 4636/2019, art. 58, par. 1.

¹⁷⁷ Presidential Decree 18/2020, Article 1, par. 3.

¹⁷⁸ Law 4636/2019, art. 32, par. 4 (as amended by law 4756/2020, art. 13) and art. 60, par. 3.

¹⁷⁹ Law 4636/2019, art. 32, par. 5 as amended by law 4756/2020, art. 13.

¹⁸⁰ Art. 22- 23, Decision of the Ministry of Migration and Asylum No. 23/13532/30-11-2020 (B’ 5272)

¹⁸¹ art. 60 para 3 (b) & (e) & para 4 case (b) L. 4636/2019. Since 2018 NGOs cooperate with state authorities to provide supported independent living to children above the age of sixteen and in late 2019 standards were established (Ministerial Decision D11/60207/2717/2019, GG 4924/B/31-12-2019)

¹⁸² Law 4760/2020, art. 43.

residence.¹⁸³ To this end, the Special Secretary for the Protection of Unaccompanied Minors in the Ministry of Migration and Asylum¹⁸⁴ have launched in April 2021 the National Tracing and Protection Mechanism for Unaccompanied children in Precarious Conditions (homeless or living in insecure conditions) and transfer them to safe accommodation.¹⁸⁵ Since its establishment up to September 2021, a total of 892 cases of accommodation requests were submitted to the National Mechanism which is indicative for the homelessness and precarious living conditions that unaccompanied children may face in Greece.¹⁸⁶

In case of a decision on provision of **international protection** in Greece, material reception conditions including provision of accommodation are discontinued within 30 days following the delivery of the relevant decision and persons accommodated should leave accommodation facilities.¹⁸⁷ In the case of UAC the relevant provisions apply only after 18 years of age while the law also provides for the possibility of extension of material reception conditions due to important reasons.¹⁸⁸ It is worth noting that criteria related to children per se are not included in the eligibility reasons for extension of material reception conditions unless other reasons for eligibility apply.

As a result, families with children beneficiaries of international protection, not considered eligible for an extension of accommodation, can access accommodation within terms and restrictions that apply for third-country nationals legally residing in the country.¹⁸⁹ In general, this means that they can either apply for the housing subsidy and relevant housing support measures or apply for entry in the available temporary accommodation centres for homeless people.

In addition, there is a specific temporary programme in place, in response to the housing need for that group which is the HELIOS Project (Hellenic Integration Support for Beneficiaries of International Protection),¹⁹⁰ offering rental subsidies to

¹⁸³ Instead, the Public Prosecutor and the Special Secretariat are immediately informed to take the necessary steps for the minor's transfer and placement in emergency accommodation facility or other appropriate facility for minors [L. 4636/2019 (A'169), art. 60 par. 3 (bst)].

¹⁸⁴ In partnership with UNHCR, and in collaboration with the International Organization for Migration (IOM), and the NGOs Network for Children's Rights, Arsis and METAdrasi.

¹⁸⁵ MoMA, In operation the National Mechanism for Tracing and Protecting Unaccompanied Children in Precarious Conditions. April 6th 2021.

¹⁸⁶ National Center for Social Solidarity, Unaccompanied children in Greece, October 15, 2021. Available at: https://www.ekka.org.gr/images/STATISTIKA/GR_EKKA_Dashboard_20211015.pdf

¹⁸⁷ Law 4636/2019, art. 114, par. 1, as amended.

¹⁸⁸ Based on the relevant Ministerial Decisions (No 23/13532, FEK B'5272, 30-11-2020, art. 21, No 13348/2020 FEK 1199 B', 7-4-2020, art. 6, and No 270/2021, FEK 451/B/5-2-2021, art. 21-22) there is an extension of the material reception conditions for specific categories of persons: for persons facing serious health diseases for whom the change of living environment will constitute a life risk extension is provided for a period of two months, for women in advanced or threatened pregnancy or who have recently given birth extension is provided for a period of two months since birth which applies also to their family members, and unaccompanied children for a period of three months following their adulthood.

¹⁸⁹ Art. 33 of the Law No. 4636/2019 states that:

"Beneficiaries of international protection have access to accommodation under the terms and restrictions applicable to third-country nationals legally residing in the country, taking into account the need to disperse them at national level and to ensure equal opportunities in terms of access to accommodation".

¹⁹⁰ This Project began in July 1, 2019 and was completed in November 30, 2020, but it was extended until mid 2021 after consultation with the European Commission. It aims particularly at supporting housing needs of beneficiaries of international protection in Greece for a specific period of time.

It foresees the provision of accommodation support, integration-related educational courses (e.g., lessons in Greek language, courses in professional skills' development, etc.), and professional

assist beneficiaries in finding accommodation,¹⁹¹ subject to a rental agreement of 6 months or more and a bank account. However, despite the fact that accommodation services were extended due to COVID-19 pandemic,¹⁹² there are concerns expressed by UNHCR¹⁹³ and Civil Society Organizations on the increased homelessness risks faced by beneficiaries of international protection.

Barriers identified include difficulties in obtaining the HELIOS rental subsidy due to “inability to issue a social security number (PAAYPE), a tax number (AFM) or open a bank account, because of bureaucratic obstacles, language barriers and discrimination” as well as due to Covid-19 restrictions and the remote locations of the accommodation facilities (camps).¹⁹⁴ As of December 2020, ESTIA programme which provides accommodation in apartments for vulnerable asylum seekers, was accommodating a total of 20,356 persons, including 6,199¹⁹⁵ beneficiaries of international protection; 52% of the persons accommodated were children. From January to June 2021, a total of 4,585 children were granted international protection in Greece.¹⁹⁶ Considering that accommodation is limited to a specific period of time, coupled with the acute barriers beneficiaries of international protection face in obtaining necessary documentation, **these children and their families may also be considered as being at risk of homelessness.**

Children in institutional care

Lastly, for children in institutional care, the Council of the European Union recommends that member states shall ensure the transition of children from institutional or foster care to quality community-based or family-based care and support their independent living and social integration to guarantee effective access to adequate housing.¹⁹⁷ In that context, the institutional framework provides that when a child is deprived of (appropriate) family environment, among the measures that may be taken to ensure his/her best interests and well-being is foster care,¹⁹⁸ namely the appointment of the child’s actual care to a third party by court or prosecutorial order or by contract.

counselling sessions to 5,000 households which corresponds to 11,200 individuals depending on the composition of each household.

¹⁹¹ According to available IOM statistics, 33,298 beneficiaries of international protection had been registered on the HELIOS Project by 5 February 2021 since the beginning of the project.

¹⁹² Joint Ministerial Decision No 13348/2020 FEK 1199 B’, 7-4-2020, art. 7 extends the provision of accommodation for ESTIA beneficiaries until May 31 2020.

¹⁹³ UNHCR, Greece must ensure safety net and integration opportunities for refugees, June 2, 2020. Available at: <https://www.unhcr.org/news/briefing/2020/6/5ed603924/greece-must-ensure-safety-net-integration-opportunities-refugees-unhcr.html>

¹⁹⁴ Refugees in Greece: risk of homelessness and destitution for thousands during winter, Joint Press Release of 74 organizations, December 22, 2020. Available at:

https://www.gcr.gr/media/k2/attachments/20201222_Release_en.pdf

¹⁹⁵ UNHCR, 2020, Information not on accommodation. Available at:

<https://data2.unhcr.org/en/documents/details/84580>

¹⁹⁶ Ministry of Migration and Asylum, Press release, June 2021.

¹⁹⁷ Council Recommendation (EU) 2021/1004 of 14 June 2021 establishing a European Child Guarantee, par. 10(d).

¹⁹⁸ Articles 1655-1665 of the Civil Code, issued by Law 2447/1996, PD 86/2009 and recently the Law 4538/2018. A registry of candidate foster parents and approved foster parents has also been established. In addition, each child protection and care unit (public or private law) has to keep a registry with the data and legal issues of minors they house and notify the National Center for Social Solidarity in order to enter the data to the National Registry for Minors.

However, the child care system in Greece remains reliant on the use of long-term residential care. There is limited availability of community-based prevention services and few alternative family-based care services. The length of children's stay in care is long-term, and in most cases there is a corresponding tacit social norm that "institutions are a good solution for children." Drivers for institutionalization include poverty, lack of community-based prevention and support services, lack of inclusive education, lack of specialized family support and parent training, disability categorization and attitudes.

Over the past few years, Greece has seen new important developments for their child care system. In 2018, a new Law on Foster care and Adoption paved the way for the expansion of family-based care modalities, and in late 2019, there were renewed efforts to take forward De-Institutionalization (DI) and community-based care with the draft a DI National Strategy and Action Plan which were finalized in June 2021.

C. Key Conclusions

- **Non realization of homeless children’s right to adequate housing in view of the lack of a cohesive national social housing policy, relevant legal framework** and subsequent monitoring and accountability mechanisms. The absence of a child sensitive housing policy is contradicting international human rights standards stipulating that States, including its judiciaries, “must ensure that the right to adequate housing is recognized and enforceable as a fundamental human right through applicable constitutional and legislative provisions or through interpretations of interdependent rights such as the right to life”.¹⁹⁹
- **Significant gaps (lack of resources and common operational framework) in the provision of primary social care services at municipal level, impeding the prevention and early identification** of cases of inadequate or lack of access to housing among children. Again, in contradiction to international human rights standards highlighting that “*Measures taken must be deliberate, concrete and targeted towards the fulfilment of the right to housing within a reasonable time frame. States must allocate sufficient resources and prioritize the needs of disadvantaged and marginalized individuals or groups living in precarious housing conditions and ensure transparent and participatory decision-making*”.²⁰⁰
- **Housing supporting measures are often not child sensitive as the presence of children in the household is not always considered within eligibility conditions for assistance** (i.e. “Housing and Work” programme), compromise their optimal growth and development in the future.
- While specific provisions are in place to link specific pro-poor social programs (GMI) to homeless persons, **the eligibility criteria are not taking into account the adequacy dimension (precarious access to housing or to meet the required technical specifications and availability of electricity and water supply), as provisioned by the legal definition of**²⁰¹ **homelessness**. In addition, in this measure there is no specific provision or special treatment for families with children.
- Lack of **special provisions for children beneficiaries of international or subsidiary protection and their families in terms of discontinuation of material reception conditions** (which includes provision of accommodation); as they are currently requested to leave accommodation facilities within 30 days following the delivery of the decision granting them international or subsidiary protection.

¹⁹⁹ OHCHR (2019), Guidelines on the implementation of the access to adequate housing, Special Rapporteur on the right to housing

²⁰⁰ Ibid

²⁰¹ Law 4052/2012, art. 29, par. 1 and 2. (i.e. “housing... that meets the necessary technical specifications and has the basic water supply and electricity services”).

- Access to some programmes is subject to strict administrative requirements, such as no criminal record, legal residency in the country, provision of a tax statement, or proof of identification²⁰². Hence, **specific disadvantaged social groups, mainly Roma and international protection beneficiaries may not have the documentation required by the institutional framework to support their eligibility for the programmes, resulting into their ineligibility** (institutional discrimination).
- Aligned with the institutional framework in place,²⁰³ the programme “Housing and Work” can be implemented by local governments or Public law Entities supervised by the MoLSA subject to expression of interest to submit relevant funding applications. This often implies that not all municipalities are benefiting from the program.
- International protection beneficiaries and their children are eligible for the housing subject to legal and uninterrupted residence for a period of five years in the country, which may result into ineligibility for the programme given that programmes providing housing support for beneficiaries of international protection last only for a few months.
- Similarly, **third country nationals with children are eligible after a period of 12 years of legal and permanent stay in Greece.**
- No comprehensive evidence, including full datasets – let alone disaggregated data – are available on the usage of the establishments providing support services to the homeless, despite the fact that the relevant legal framework envisages that all entities which run such establishments should submit an annual progress report of their activity to the competent ministry.²⁰⁴ **Consequently, there is very limited information about the number and profile of homeless children in Greece.**
- **The child care system in Greece remains reliant on the use of long-term residential care and there is limited availability of community-based prevention services** and few alternative family-based care services while the length of children’s stay in care is long-term.
- Lastly, a number of coercive measures/restrictions have been introduced in the recent years which have a legal basis and can potentially do harm by inadvertently criminalizing the homeless in general and children in particular: the banning and criminalization of begging (Penal Code article 407); sanitary/public health administrative provisions; occupancy of private spaces (civil law, and penal provisions/Penal Code article 382).²⁰⁵

²⁰² Abbé Pierre Foundation and FEANTSA (2019), Fourth Overview of Housing Exclusion in Europe, March 2019, available at:

https://www.feantsa.org/public/user/Activities/events/OHEEU_2019_ENG_Web.pdf

²⁰³ Law 4756/2020, article 15, par. 5 and Joint Ministerial Decision Δ13/οικ. 42815/2021, ΦΕΚ 2788/Β/30-6-2021, art. 2.

²⁰⁴ Ziomas, Dimitris, Konstantinidou, Danai, Capella, Antoinetta. and Vezyrgianni, Katerina. (2019). ESPN Thematic Report on National strategies to fight homelessness and housing exclusion – Greece, European Social Policy Network (ESPN), Brussels: European Commission.

²⁰⁵ FEANTSA (2018), Country Profile Greece, accessed at: <https://www.feantsa.org/download/greece-20172928673074328238317.pdf>

IV. Access to healthy nutrition

Nutrition profile of children in Greece

Nutrition is an essential part of health and development. Healthy nutrition is related to improved infant, child and maternal health, stronger immune systems, safer pregnancy and childbirth, lower risk of non-communicable diseases and longevity. This chapter describes the current situation of children's dietary patterns in Greece and presents the limited data available regarding the take-up, unmet needs and barriers to access for children in need and their families across the country based on the enabling policy and programmatic framework. In the absence of a comprehensive institutional framework on nutrition and adequate data in Greece, children in need in terms of access to a healthy nutrition remain difficult to effectively determine.

A. Main data

Access of children

Greece is "off track" to meet all maternal, infant and young child nutrition (MIYCN) targets, which specified a set of six global nutrition targets that by 2025 aim to:

- achieve a 40% reduction in the number of children under-5 who are stunted;
- achieve a 50% reduction of anaemia in women of reproductive age;
- achieve a 30% reduction in low birth weight;
- ensure that there is no increase in childhood overweight;
- increase the rate of exclusive breastfeeding in the first 6 months up to at least 50%;
- reduce and maintain childhood wasting to less than 5%.

No progress has been made towards achieving the low birth weight target, with 9.4% of babies having low birth weights in 2019. There is insufficient data to assess Greece's progress towards achieving the goal of exclusive breastfeeding, as well as insufficient prevalence data. Greece has made limited progress towards meeting its food-related non-communicable disease (NCD) targets. The prevalence of obesity in Greece is significant as discussed in the chapter on the access to Health²⁰⁶.

In addition, 45.8% of low income households declared in 2020 incapacity to afford a diet that includes chicken, meat, fish or vegetables of equal nutritional value every other day, while the corresponding percentage for non-poor households is estimated at 5.3% (ELSTAT, 2021).

Analysis of data from the 2014 *EU-SILC ad-hoc module on child deprivation*²⁰⁷ and other relevant research²⁰⁸ shows that:

²⁰⁶ <https://globalnutritionreport.org/resources/nutrition-profiles/europe/southern-europe/greece/>

²⁰⁷ <https://ec.europa.eu/eurostat/web/income-and-living-conditions/data/ad-hoc-modules>

²⁰⁸ E. Toczydlowska, *Children in the Bottom of Income Distribution in Europe: Risks and Composition*, 2016, p. 17.

- at least 33% of poorest children²⁰⁹ in Greece could not afford one meal with meat, chicken or fish (or vegetarian equivalent) at least once a day;
- at least 29% of poor children in Greece could not afford fruit and vegetables once a day.

The very unequal access of poor children to fruit and vegetables is alarming in a country like Greece (see **Table 1 below**). In 2020, more than half of low income households (below 60% of median equivalized income) with dependent children (54.1%) were unable to afford a meal with meat, chicken, fish or vegetable with higher prevalence in large families (58.9%) and single families (56.9%). In these households, 1 in 2 families report being unable to follow a healthy nutrition diet. Poor households with three or more adults with dependent children in particular have had persistently higher percentages (in certain cases more than double) than the EU27 averages over the last five years.

Table 1 Inability to afford a meal with meat, chicken, fish (or vegetable equivalent) every second day by household type for poor households (below 60% of median equivalized income) - Greece and EU27 (2015-2020)

	2015		2016		2017		2018		2019		2020
	EL	EU27	EL	EU27	EL	EU27	EL	EU27	EL	EU27	EL
Single person with dependent children	62.4%	24.3%	70.4%	23.6%	55.5%	23.1%	28.4%	17.6%	49.3%	19.7%	56.9%
Two adults with one dependent child	61.2%	19.6%	50.2%	19.7%	43.9%	18.9%	34.2%	17.7%	38.1%	17.3%	45.4%
Two adults with two dependent children	55.2%	17.8%	57.9%	16.9%	38%	14.9%	22.8%	14.7%	33.1%	12.8%	46.9%
Two adults with three or more dependent children	68.2%	22.5%	70.4%	26.7%	56.2%	21.4%	37.9%	17%	42.1%	15.9%	58.9%
Three or more adults with dependent children	59.1%	26.2%	74.7%	24.3%	56.7%	24.6%	31.5%	25.7%	46.1%	19.7%	59.9%
Households with dependent children	59.7%	22%	63.9%	22%	47.9%	20.3%	30%	18.5%	40.5%	16.8%	54.1%

Note: Data for EU27 are estimated values / Source: Eurostat (2020) (ilc_mdcs03)

According to OECD (2014), the 12.9% of children aged 1-15 years old were deprived of basic nutrition in Greece, while the OECD average was 8.9%.²¹⁰ The low birthweight of children is also a relevant indicator of poor nutrition. In 2019, infants

²⁰⁹ Poorest children, or children in the bottom end of the income distribution, were defined as those in the poorest decile, i.e. with incomes falling below the 10th percentile in each country.

²¹⁰ <https://stats.oecd.org/Index.aspx?QueryId=81204#>

with low birthweight amounts for 9.4% of total live births in Greece. Data are not available on a breakdown based on the socio-economic status of households.

Similar findings are arrived at by the Hellenic National Nutrition Survey (2020), demonstrating that a large number of children had insufficient intakes of numerous micronutrients including vitamins D,²¹¹ K. Meanwhile potassium was inadequate in practically all individuals while vitamin A, folate, calcium and magnesium were also insufficient, especially in girls aged 14–18 years. The analysis highlights that such results are largely due to poor habitual dietary intake.²¹² A similar study focusing on preschool dietary intake, found that preschoolers and/or their caregivers made unhealthy good choices, overconsuming energy-dense, low-nutritious food items (sweet snacks or sugared beverages).

Accordingly, low scores were found on dietary diversity and dietary equilibrium.²¹³ Similarly in a study conducted in 2018, the majority of the total population did not consume fruits (69.3%) or vegetables (66.3%) every day and boys specifically reported eating fruits and vegetables less often compared to girls. More girls than boys reported frequent consumption of sweets, although only in the 15-year old group, whereas boys consumed more sugar-sweetened beverages than girls in all age-groups. Girls had a statistically significant better diet quality than boys in all age groups. When differences between the age groups were studied, consumption of fruits and vegetables was lower and consumption of sweets and sugar-sweetened beverages was higher in the 13- and 15-year old age children compared to the children aged 11-years old. Boys had 37% higher probability of having moderate or poor diet quality compared to girls. In the case of school-aged adolescents living in Greece, relatively high proportions, ranging from 20.2% to 32.9%, were regularly skipping breakfast, were frequently eating in front of a screen and in fast-food restaurants, all contributing to unhealthy dietary patterns.²¹⁴

B. Institutional Challenges

1. The Institutional and Policy Framework on Access to Healthy Nutrition

Greece is not currently benefiting from a comprehensive healthy nutrition policy for children and provisions to date remain fragmented and lack the necessary accountability mechanisms which would enable their effective assessment.

²¹¹ Manios et al (2017), Prevalence of vitamin D deficiency and insufficiency among schoolchildren in Greece: the role of sex, degree of urbanisation and seasonality, *British Journal of Nutrition* (2017), 118, 550–558

²¹² Micronutrient intakes and their food sources among Greek children and adolescents, Hellenic National Nutrition Health Survey, 2020

²¹³ Pinket et al, (2016), Diet quality in European pre-schoolers: evaluation based on diet quality indices and association with gender, socio-economic status and overweight, the ToyBox-study, *Public Health Nutrition*: 19(13), 2441–2450

²¹⁴ [1] Benetou, Vassiliki, Afroditi Kanellopoulou, Eleftheria Kanavou, Anastasios Fotiou, Myrto Stavrou, Clive Richardson, Philippos Orfanos, and Anna Kokkevi. 2020. "Diet-Related Behaviors and Diet Quality among School-Aged Adolescents Living in Greece" *Nutrients* 12, no. 12: 3804. <https://doi.org/10.3390/nu12123804>

1.1 Nutrition for children enrolled in public and private nurseries

The institutional framework in place foresees²¹⁵ the provision of adequate quality and quantity of food (breakfast and lunch or even afternoon snack) in nurseries, according to up to date paediatric and nutritional perspectives, developed by a nutritionist.²¹⁶ There is also a specific focus on provision of fresh vegetables and fruit, meat, fish and milk products, as well as avoidance of food containing harmful ingredients such as preservatives, coloring agents, artificial sweeteners, added sugar or salt. The framework also includes a suggested meal plan with the type and quantities of food to be offered at nurseries.

In addition, there are specific provisions on the safety and the hygiene of the food, stipulating that for food prepared within the nursery facilities, the HACCP principles and required hygiene standards should apply. If the food is prepared by parents, instructions on the safe storage and rewarming should be provided to them and implementation of these instructions has to be ensured by the nursery staff.²¹⁷

1.2 The school canteen policy for primary and secondary schools

The enabling policy framework on the hygiene rules²¹⁸ for public and private primary and secondary school canteens and dining areas aims at promoting the health of the student population by creating a supportive school environment that promotes healthy eating. The framework regulates the procurement, storage, preparation and selling of food. It is also required that schools offering meals should follow the Mediterranean Diet Pyramid (Ministry of Health nutrition guidelines, 1999).²¹⁹ The institutional framework clearly defines categories of food and drinks allowed to be sold and served by the school canteens, while a relevant control system for the implementation of this framework is foreseen.²²⁰

An internal evaluation developed by the Ministry of Health (Department of Public Health and Department of Nutrition) states that the current policy has a strong impact on preventing childhood obesity, as it takes into account cultural, political and social contexts and barriers. The policy is available in a detailed manual, it has a community component and it is replicable and transferable. Furthermore, it is implemented in a large population, relevant stakeholders are involved (school staff, community, food sellers, etc.), it has high popularity and participants' satisfaction and the continuation of the policy is ensured.²²¹ However, in practice, implementation of this policy framework seems to be limited. A survey among pre-school teachers published in 2017 found that in 55,56% of school canteens the institutional framework was not applied.²²² Furthermore, the above provisions apply to students

²¹⁵ Ministerial Decision No Y1α/Γ.Π. OLK. 76785/12-10-2017, art. 4.

²¹⁶ Defined as "child and infant centers" in the relevant legislation.

²¹⁷ Ministerial Decision No Y1α/Γ.Π. OLK. 76785/12-10-2017, art. 5 and 6.

²¹⁸ Ministerial Decision No Y1γ/ Γ.Π/οικ 81025/27.08.2013 (Ministry of health)

²¹⁹ Op.cit., art. 4 and 5.

²²⁰ Op.cit., art. 8 and 9.

²²¹ Available at: <https://webgate.ec.europa.eu/dyna/bp-portal/getfile.cfm?fileid=171>

²²² THANASOULA, & HARITAKI (2017). "Investigating the effect of preschool teachers' activities on the formation of children's behaviors in matters of Nutrition through Health Education programs." Panhellenic Conference of Educational Sciences, 1, 248-271. Available in Greek at: https://www.researchgate.net/publication/331583343_Diereunese_tes_epidrases_drasterioteton_ton_ek

able to afford food by the canteens. Students who do not have the financial means to buy products in school canteens are still at risk of consuming products high in fat, salt and sugar, bought out of school; leaving again a significant segment of child's population with unmet needs.

1.3 Limitations on marketing and sale of unhealthy foods

Limitations to the audiovisual commercial communications on specific products were introduced by law in 2021,²²³ including specific provisions for children. Based on the relevant institutional framework, audiovisual commercial communications on alcoholic beverages shall should be child sensitive and discourage alcohol consumption.²²⁴ Furthermore, video dissemination platforms shall take measures to discourage children from excessive consumption of low nutrient food and drinks.²²⁵ Communication and advertisement providers shall also establish codes of conduct to regulate audiovisual commercial communications broadcasting during children's programmes that promote foods or beverages containing nutrients and substances with a nutritional or physiological effect such as fat, trans-fatty acids, salt or sodium and sugars, of which excessive intakes in the overall diet are not recommended.²²⁶ In addition, some general limitations on audiovisual commercial communications on cigarettes and other tobacco products²²⁷ consider children, even though they do not exclusively focus on them. Additional initiatives serving to match a holistic effort to deter consumption of unhealthy foods by children, including, for example, the banning of vending machines and restrictions on food and drink marketing on school premises nationwide are not currently put in place.²²⁸

1.4 National Action Plan on Public Health 2021-2025

The National Action Plan on Public Health 2021-2025²²⁹ includes specific Activities on the Adoption of Healthy Nutrition Habits²³⁰ by the population as part of the Public Health Activities. However, there is a lot of room for improvement in terms of the child sensitivity of the action plan. For example, the National Action Plan on Nutritional Policy²³¹ includes very limited activities focusing on children, mainly on nutrition education. In addition, the Strategic Targets of the Ministry of Health²³² for 2021 include as an intervention axis under Strategic Target 2 the improvement of nutrition habits and combat of all kinds of bad nutrition (obesity, malnutrition) with a focus on children and youth.

[paideutikon_proscholikes_elikias_ste_diamorphose_symperiphoron_ton_paidion_se_themata_Diatrophes_mesa_apo_ta_programmata_Agoges_Ygeias](#)

²²³ Law 4779/2021 that transposed the Directive 2010/13/EU as modified by the Directive 2018/1808/EU.

²²⁴ Law 4779/2021, art. 14, par. 4.

²²⁵ Op.cit., art. 32.

²²⁶ Op.cit., art. 14, par. 6.

²²⁷ Op.cit., art. 14, par. 3.

²²⁸ UNICEF, A Situation Analysis of Children and Youth in Greece, 2020.

²²⁹ Ministry of Health, April 2021. Available at: <https://www.moh.gov.gr/articles/health/domes-kai-drasesis-gia-thn-ygeia/ethnika-sxedia-drashs/8776-ethniko-sxedio-drashs-gia-th-dhmosia-ygeia-2021-2025?fdl=20523>

²³⁰ Ministry of Health, 2021, National Action Plan on Public Health 2021-2025, p. 27.

²³¹ The Action Plan on Nutritional Policy is included in the annex of the National Action Plan on Public Health, p. 104-116.

²³² Ministerial Decision Protocol No ΓΠ/οικ.146/29.12.2020, p. 11.

1.5 Promotion of breastfeeding

Breastfeeding contributes to optimal growth and development of infants, while exclusive breastfeeding is recommended for the first six months of life.²³³ In Greece, specific measures for the promotion of breastfeeding have been established by law since 2014. More specifically, these include the creation of breastfeeding spaces in the community and the workplace; the implementation of the "Baby Friendly Hospitals" Initiative of the World Health Organization;²³⁴ the creation of Milk Banks in Hospitals and Clinics with Neonatal Units; and the establishment of a "Register of Trainers" at the Ministry of Health for the Promotion of Breastfeeding²³⁵. Furthermore, the requirement of a written informed consent signed by the mother for the provision of a breast-milk substitute prior to discharge from the maternity clinic was introduced in 2017.²³⁶

In 2018, the Ministry of Health published guidelines with regard to complementary feeding initiation, recommending exclusive breastfeeding for the first 6 months of age.²³⁷ Furthermore, a national breastfeeding campaign was implemented by the Institute of Child Health. The campaign was comprised of educational activities for health professionals and parents, a breastfeeding helpline, and a series of videos available online, as well as leaflets and television spots broadcast countrywide.²³⁸

The above legislative initiatives and policies have had a positive impact on breastfeeding uptake, with an increasing trend in breastfeeding indicators and more prevalent maternity hospital practices favouring breastfeeding in 2017, as compared to 2007. Nevertheless, breastfeeding rates, particularly rates of exclusive breastfeeding up to the 6th month of age still remain low. While 94% of mothers breastfed their baby on their 1st day of life, 51% exclusively breastfed at the end of the first week, 40% at the end of the first month, 25% at end of the fourth month, and 0.8% at the end of the sixth month.²³⁹ The main factors affecting breastfeeding include maternal smoking during the postpartum period, prescription of infant formulas, and insufficient support and information on breastfeeding in hospitals at birth to help mothers commence breastfeeding.²⁴⁰ It was also found that women with higher education levels and women of immigrant status were more likely to

233 WHO/UNICEF. Global strategy for infant and young child feeding. Geneva: Switzerland, 2003

234 Further regulated by Ministerial Decision 43457/2019. Available at:

<https://www.moh.gov.gr/articles/health/dieythynsh-dhmosias-ygieinhs/metadotika-kai-mh-metadotika-noshmata/c387-nomothesia/6541-nomothesia-anaforika-me-thn-prowthshsh-toy-mhtrikoy-thhiasmoy?fdl=15651>

235 Law 4316/2014, Article 3. Available in Greek at: <https://www.moh.gov.gr/articles/health/dieythynsh-dhmosias-ygieinhs/metadotika-kai-mh-metadotika-noshmata/c387-nomothesia/6541-nomothesia-anaforika-me-thn-prowthshsh-toy-mhtrikoy-thhiasmoy?fdl=15649>

236 Available in Greek at: <https://www.moh.gov.gr/articles/health/dieythynsh-dhmosias-ygieinhs/metadotika-kai-mh-metadotika-noshmata/c387-nomothesia/6541-nomothesia-anaforika-me-thn-prowthshsh-toy-mhtrikoy-thhiasmoy?fdl=15650>

237 Available in Greek at: http://epilegothilasmog.gr/wp-content/uploads/2018/09/systaseis_diatrofi_2018.pdf

238 Child Health Institute: <http://epilegothilasmog.gr/>

239 Child Health Institute. "National Study on the frequency and determinants of breastfeeding in Greece", 2018. Available in Greek at: http://epilegothilasmog.gr/wp-content/uploads/2018/03/meleti_breastfeeding_-2018_17_final.pdf

240 Iliodromiti Z, Zografaki I, Papamichail D, Stavrou T, Gaki E, Ekizoglou C, Nteka E, Mavrika P, Zidropoulos S, Panagiotopoulos T, Antoniadou I., "Increase of breast-feeding in the past decade in Greece, but still low uptake: cross-sectional studies in 2007 and 2017". Public Health Nutr. 2020 Apr;23(6):961-970. doi: 10.1017/S1368980019003719. Epub 2020 Jan 17. PMID: 31951189. Available at: <https://www.cambridge.org/core/journals/public-health-nutrition/article/increase-of-breastfeeding-in-the-past-decade-in-greece-but-still-low-uptake-cross-sectional-studies-in-2007-and-2017/BD992B5DF2A943DA085BC6E64573681C#article>

demonstrate increased duration of breastfeeding.²⁴¹ Regarding children of refugees and asylum seekers, there is no systematic data collection on access to breastfeeding. However, NGO and journalistic sources have recurrently highlighted that infant formulas are far more prevalent than breastfeeding in Greek refugee camps, while mothers do not have the means to secure adequate formula supplies.²⁴²

Dedicated studies on determinants of breastfeeding in Greece²⁴³ demonstrated that mothers with high pre-pregnancy BMI are less likely to initiate breastfeeding while high gestational weight gain has no significant effect on either initiation or duration of breast-feeding in Greece. Other socio-economic and cultural factors, such as maternal education and smoking, were also found significant for the initiation of breast-feeding. The study concludes that obese women need to be given additional support to initiate and sustain breast-feeding when developing breastfeeding promotion programmes and policies.

1.6 Access to food provision programs

The **School Meals Programme** introduced in 2017, provides a hot meal to each student on schooldays, in pre-selected primary schools across the country. The Operational Programme “**Food and Basic Materials Assistance**” launched in 2016 through the Fund for European Aid to the Most Deprived (FEAD) is the main structured food provision program implemented in Greece to combat food insecurity. Furthermore, the “**School Scheme**” in place since 2017, aims to support a healthy diet through the distribution of fruit, vegetables and milk to schoolchildren. Additionally, the **Social Groceries** operated under the responsibility of Municipalities and the Greek Orthodox Church, distribute food and basic materials once a month to cover primary needs of low-income households.

The School Meals programme

The school meals programme was introduced in 2017²⁴⁴ and is considered a food provision programme.²⁴⁵ However, given that school environment is an ideal setting for initiatives to improve child dietary intake and behaviors, the specific programme can contribute both to the reduction of food insecurity and the promotion of healthy nutrition. The programme is funded by the MoLSA²⁴⁶ and is operationalized by private contractors (mainly catering companies) providing the meals directly to the

241 Tavoulari EF, Benetou V, Vlastarakos PV, Psaltopoulou T, Chrousos G, Kreatsas G, Gryparis A, Linos A., “*Factors affecting breastfeeding duration in Greece: What is important?*”, *World J Clin Pediatr* 2016; 5(3): 349-357 Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4978630/pdf/WJCP-5-349.pdf>

242 The Guardian. “*Breastfeeding: how one group fought the spread of formula milk in refugee camps*”. By Brooke Bauer. November 2016. Available at: <https://www.theguardian.com/global-development-professionals-network/2016/nov/30/baby-bottles-camps-dangerous-refugee-mothers-breastfeed-greece>; The World. “*Mothers and babies lack basic needs in Greek refugee camps*”. By Deepa Fernandes. July 2019. Available at: <https://www.pri.org/stories/2019-07-22/mothers-and-babies-lack-basic-needs-greek-refugee-camps>.

243 Manios et al (2007), The effect of maternal obesity on initiation and duration of breast-feeding in Greece: the GENESIS study, *Public Health Nutrition*: 12(4), 517–524

244 Law 4445/2017, art. 12, par 1 stipulates that Ministry of Labour and Social Affairs is developing, coordination and supervising the programme. The schools mean programme had been piloted in 2016 in the Municipality of Perama in Attica Region.

245 Law 4445/2017, art. 12, par. 2.

246 Law 4445/2017, art. 12, par 5.

schools. The contractors are selected²⁴⁷ by the Organization for Welfare Benefits and Social Solidarity - OPEKA²⁴⁸ that is responsible for the management of the programme.²⁴⁹ The programme is implemented in specific primary education schools across the country which are defined by a Joint Ministerial Decision by Ministers of Education and Religious Affairs and Labour and Social Affairs each school year.²⁵⁰ This means that it is a programme targeting specific schools and the children attending them rather than individual children with unmet food needs.²⁵¹ A relevant circular issued every school year by MoERA regulates the implementation of the programme at school level, notably the administration of the programme. The programme provides during the 5 educational days of the week a hot meal for every student based on the Mediterranean nutrition model and covers all students attending the specific school,²⁵² provided that parents give their written consent for the participation of their child in the programme.²⁵³

In terms of the selection of participating schools, first OPEKA defines the municipalities where the programme will be implemented and the number of beneficiaries in each municipality. The selection of the specific schools for each school year is determined by the Regional Directorates of Primary Education²⁵⁴ which indicate to MoERA the schools in need per municipality that fall into their area of jurisdiction.

More specifically, the criteria²⁵⁵ take into consideration:

1. school units housed in neighborhoods with significant economic and social problems;
2. school units with a significant number of pupils living in households at increased risk of poverty;
3. school units with a significant number of pupils living in severe material deprivation;

²⁴⁷ The latest call the concerns school years 2021-2022 and 2022-2023 is available at: <https://opeka.gr/wp-content/uploads/2021/04/ΔΙΑΚΗΡΥΞΗ-6-2021ΚΗΜΔΗΣ.pdf> (This call has been canceled by the Hellenic Court of Audit on October 13th 2021).

²⁴⁸ Based on law 4520/2018, art.1, par.2 OPEKA is a Legal Entity of Public Law supervised by the MoLSA.

²⁴⁹ Ministerial Decision Δ14/οικ.21446/488/11-4-2018.

²⁵⁰ Law 4445/2017, art. 12, par. 7. It's also foreseen that the Directorate of Studies, Programs and Organization of Primary Education of the Ministry of Education and Religions Affairs expresses an opinion on the definition of the schools to be included in the programme.

²⁵¹ There are three main options for provision of free school meals across EU Member States: universal, schools-based targeting, and individual targeting.

a) Universal programmes effectively ensure that all low-income children are covered, or have the entitlement to be covered.

b) Programmes targeted at schools provide meals to all children in the school. This can be reinforced if children are not able to bring their own food to school. On the other hand, schools-based targeting can only hope to reach some or most vulnerable children in the country, as there will be pockets of deprivation in prosperous areas.

c) Programmes targeted at individual children have the potential to promote the participation of all AROPE children, but there are limitations in terms of means-based or rules-based criteria and the potential for stigmatization and bureaucracy being barriers to take-up by parents. The issue of how to set appropriate criteria to reach out to children who need free meals is a crucial one in assessing the effectiveness of targeted programmes.

²⁵² Ministry of Education and Religious Affairs, Circular protocol No Φ.14/ΦΜ/128820/Δ1, 12-10-21, section A1.

²⁵³ Op.cit., section A3.

²⁵⁴ Usually, Regional Directorates of Primary Education are requesting primary schools in the area of jurisdiction to submit their expression of interest to be included in the programme, however there is no evidence on the application of the criteria for selection of the schools.

²⁵⁵ As outlined in the Circular Φ.14/ 144317/ΦΜ/ 145399/Δ1, 26-10-2020 by the Ministry of Education and Religious Affairs.

3. school units with an increased number of pupils from vulnerable social groups.

For the school year 2021-2022, a model of multi-criteria hierarchy was applied for the identification of the Municipalities that would participate in the program. The criteria for the classification and selection of the Municipalities focused on the estimation of the number of families with equivalent income 0 - 6,000 euros receiving child allowance for children aged 5-11 years; the concentration of families receiving Minimum Guaranteed Income; the registered unemployed persons of OAED – 2020, aged 25- 45 years with children; assessment of the risk of changing employment conditions in relation to the effects of the pandemic Covid-19.

Thus, it appears that the criteria for the selection of schools take into account not only the social conditions prevailing at local level but also the financial situation of households. However, this approach, may lead into inconsistencies in terms of defining which schools should be prioritized. This in turn may render the application of a unified approach for the selection of schools across the country challenging.

During the school year 2021-2022 1,530 schools nationally had been included in the programme²⁵⁶ and based on the plans of the Ministry of Labour and Social Affairs 224,335 pupils in 1,620 schools would finally benefit from the programme.²⁵⁷ However, the implementation of the programme for the school year 2021-2022 had not been initiated as of October 27th 2021 due to the cancelation of the relevant call by the Hellenic Court of Audit.²⁵⁸

The Food and Basic Materials Assistance Program

The FEAD Program includes the distribution of food parcels and basic materials such as household cleaning items, clothing, baby and children's items, toiletries and personal hygiene items, on a monthly basis. It also provides psychosocial support services, empowerment services, legal aid and social tutorials to tackle social exclusion among the most deprived population. At the national level, it is coordinated by a Central Managing Authority, and implemented countrywide through a network of 57 local Social Partnerships divided among each of the 13 geographical administrative units based on population density²⁵⁹

All beneficiaries of the Social Solidarity Income who have stated that they wish to participate in the Program are eligible. In practice, approximately 90% of the Social Solidarity Income beneficiaries opt for participating in the FEAD Program.²⁶⁰ More

²⁵⁶ As of October 11th 2021, Joint Ministerial Decision No Δ14/οικ.77126, 11-10-2021, art. 2.

²⁵⁷ As of November 10th 2021, Joint Ministerial Decision No Δ14/οικ.86814, 10-11-2021

²⁵⁸ Decision of October 13th 2021. See relevant Parliament questions at:

https://www.hellenicparliament.gr/Koinovouleftikos-Elenchos/Mesa-Koinovouleutikou-Elegxou?pcm_id=93cde29f-bef4-46a1-9168-adcd00e8b02f

https://www.hellenicparliament.gr/Koinovouleftikos-Elenchos/Mesa-Koinovouleutikou-Elegxou?pcm_id=0a298d5c-1c8a-4b7d-b583-adcd00e8e1fa

²⁵⁹ FEAD Greece Managing Authority. "Implementation Guide for the Operational Programme Food and Basic Material Assistance from FEAD", 6th ed.; FEAD Greece Managing Authority, January 2021;

Available in Greek at: https://teba.eiead.gr/wp-content/uploads/2021/01/%CE%9F%CE%94%CE%97%CE%93%CE%9F%CE%A3-%CE%95%CE%A6%CE%91%CE%A1%CE%9C%CE%9F%CE%93%CE%97%CE%A3-%CE%A4%CE%95%CE%92A_6%CE%B7-%CE%95%CC%81%CE%BA%CE%B4%CE%BF%CF%83%CE%B7.pdf

²⁶⁰ Joint Ministerial Decision Γ.Δ.5 οικ. 2961-10/2017 and Joint Ministerial Decision Δ23/οικ.17108/875/2017

specifically, eligibility is based on income and property criteria and takes into account the number of children per household. As a result, children from low-income families are among the eligible beneficiaries. On the other hand, asylum seekers and recently-recognized refugees are not beneficiaries of the Program, as it targets only those who have formally completed all processes, have a national insurance number and can present all required documentation including tax declarations. Another category of persons that are in practice excluded from the Program are asylum seekers with second instance negative decisions on admissibility (particularly nationals of Syria, Afghanistan, Somalia, Pakistan, and Bangladesh), asylum seekers whose asylum applications were assessed on merit but later rejected and asylum seekers whose applications have not yet been registered due to chronic delays at the Asylum Offices of the Greek mainland.²⁶¹

The COVID-19 pandemic resulted in economic recession, leading to the impoverishment of the affected population. This in turn caused an increase in the number of applications to the FEAD program. In 2020, 293,891 households received food supplies including a total of 409,546 beneficiaries, out of whom 58,657 were children below 15 years old, 152,090 women, 23,175 beneficiaries of a migrant background, 7,480 people with disabilities and 4,069 homeless.²⁶²

According to a beneficiary satisfaction survey carried out from January 2016 to June 2018, FEAD was evaluated positively in terms of the quality of food items provided and had a high positive impact on beneficiaries' household budget, contributing approximately 10% of the monthly income. However, the Program's dietary impact has been limited, with the contribution toward food groups such as vegetables, cereals, dairy products, fruit and fish being particularly low.²⁶³ In this regard, another study found that FEAD recipients in Greece still experience low energy and protein intake, and fail to meet the recommended intake for the above-mentioned food groups. Furthermore, unemployment was higher among FEAD recipients (76%) compared to the general population, while Being a FEAD recipient was associated with higher prevalence of overweight and obesity. Notably, only 28.1% of the FEAD recipients were classified within the normal BMI range.²⁶⁴

Disaggregated data on the impact of the FEAD Program on children beneficiaries has not been collected yet, therefore it is not possible to assess its specific impact on children. Nevertheless, the figures of the FEAD beneficiaries imply that children of low-income families are at high risk of malnutrition and obesity.

²⁶¹ "Denying food: instead of receiving protection people go hungry on EU soil". Joint Open Letter signed by 33 NGOs. 26 October 2021.

²⁶² Summary of the Annual Report on the Implementation of the Operational Program "Food and Basic Material Assistance" for the year 2020. Available in Greek at: http://teba.eiead.gr/wp-content/uploads/2021/09/%CE%A0%CE%B5%CF%81%CE%B9%CE%BB%CE%B7%CF%88%CE%B7%CE%95%CF%84%CE%B7%CF%83%CE%B9%CE%B1%CF%82%CE%95%CE%BA%CE%B8%CE%B5%CF%83%CE%B7%CF%822020_%CE%95%CE%A0-%CE%95%CE%92%CE%A5%CE%A3-%CE%A4%CE%95%CE%92%CE%91_FEAD.pdf

²⁶³ Vlassopoulos, A.; Filippou, K.; Pepa, A.; Malisova, O.; Xenaki, D.; Kapsokefalou, M., "Healthy Diet Assistance for the Most Deprived in Post-Crisis Greece: An Evaluation of the State Food Provision Program". Sustainability 2021, 13, 99. <https://doi.org/10.3390/su13010099>

²⁶⁴ Chatzivagia, E.; Pepa, A.; Vlassopoulos, A.; Kapsokefalou, M.; Malisova, O.; Filippou, K., "Nutrition transition in the posteconomic crisis of Greece: Assessing the nutritional gap of food-insecure individuals. A cross-sectional study". Nutrients 2019, 11, 2914. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6950031/>

The School Scheme

Applicable since 2017, the School Scheme provides for the distribution of fresh fruit and vegetables, as well as drinking milk to school children, with the aim of supporting a healthy diet.²⁶⁵ The implementation of the Scheme is supervised by the Ministry of Rural Development and Food, in collaboration with the Ministry of Education and the Ministry of Health. For the period 2017-2023, only children in the first three classes of primary school, aged from 6 to 9 years, are covered.²⁶⁶ Distribution frequency varies, with 7 distributions of fruit and vegetables taking place during the entire 2019-2020 school year and milk being distributed 1-2 times per week.²⁶⁷ From 2017 to 2021, the Scheme has been implemented only in specific primary schools in Athens, Thessaloniki, Patra and Heraklio.²⁶⁸ During the school year 2019-2020, the distribution reached a total of 149.946 children in 828 primary schools.²⁶⁹

The selection of schools is not taking into considerations indicators relevant to poverty, social exclusion and vulnerability of children attending the respective schools. Furthermore, given that the Scheme has only been applied to schools in big cities, children in rural and remote areas of the country have been left out. Children from vulnerable groups are also not entitled to benefit from the distribution of food if they do not reside in the areas covered by the Scheme or do not attend school. Distributions are not carried out during school holidays or in any other case schools are closed. Thus, the Scheme has only benefited a limited number of children, while its impact on healthy nutrition remains unknown due to lack of monitoring mechanisms.

The Social Groceries

Eligibility for the Social Groceries is based on income criteria and is calculated independently by each municipality, according to the availability of food supplies and the needs of the population at the local level. The program is addressed to beneficiaries residing in the Municipality where each Social Grocery operates, including legal residents and stateless persons, as well as refugees and asylum seekers.²⁷⁰ Given that the operation of Social Groceries is at the discretion of municipalities and the church, nationwide coverage is not ensured and children residing in remote or underdeveloped municipalities may not be adequately covered. Furthermore, since there is no national coordination mechanism for the implementation of the program, there is neither systematic data collection nor assessment of the program's impact on children's healthy nutrition.

²⁶⁵ Commission Implementing Regulation (EU) 2017/39 of 3 November 2016 on rules for the application of Regulation (EU) No 1308/2013 of the European Parliament and of the Council with regard to Union aid for the supply of fruit and vegetables, bananas and milk in educational establishments (OJ L 5, 10.1.2017, p. 1).

²⁶⁶ National Strategy 2017-2023. Available at: https://ec.europa.eu/info/sites/default/files/food-farming-fisheries/key_policies/documents/el-school-scheme-strategy-2017-23_en.pdf.

²⁶⁷ The EU school fruit, vegetables and milk scheme. Annual Monitoring Report, Greece, 2019/2020 school year. Available at: https://ec.europa.eu/info/sites/default/files/food-farming-fisheries/key_policies/documents/el-school-scheme-monitoring-report_2019_2020_en.pdf

²⁶⁸ <https://eu-schoolprogramme.minagric.gr/frouta/index.php/about-us>

²⁶⁹ The EU school fruit, vegetables and milk scheme. Annual Monitoring Report, Greece, 2019/2020 school year. Available at: https://ec.europa.eu/info/sites/default/files/food-farming-fisheries/key_policies/documents/el-school-scheme-monitoring-report_2019_2020_en.pdf

²⁷⁰ <http://www.socialattica.gr/eidi-domis/koinoniko-pantopoleio>

1.7 Access to Information and Education on Healthy Nutrition

The National Nutrition Guide for Infants, Children and Adolescents

The Nutritional Recommendations for the General Population and Specific Population Groups adopted by Ministry of Health²⁷¹ include a specific National Nutrition Guide for Infants, Children and Adolescents developed in 2014 that provides comprehensive guidelines on the nutritional ingredients and their selection.²⁷² The Guide has also been endorsed by the Ministry of Education, while the Hellenic Institute for Educational Policies has approved its use and dissemination in public schools nationwide. In this regard, it has been disseminated in print format and made freely accessible to the general public in electronic format.²⁷³

Education on Healthy Nutrition

Education on healthy nutrition is part of the Health Education curriculum taught in pre-school, primary and secondary schools.²⁷⁴ Educational material has been developed by the Ministry of Health²⁷⁵ to promote nutrition and healthy eating habits among children. The subject is taught by trained teachers, nutritionists or health professionals. However, its impact remains limited, since it only covers one hour per school year.²⁷⁶

Educational activities at primary schools are also implemented as part of the *School Scheme*, in the form of lessons, lectures, workshops, and tasting classes. During the school year 2018-2019, 138,135 schoolchildren participated in such activities.²⁷⁷ However, during the school year 2019-2020, no educational activities took place, due to the closure of schools in light of the Covid-19 pandemic.²⁷⁸

²⁷¹ Circular protocol No Γ1α/ΓΠ οικ 76309, 11/10/2017 that provides also a dissemination plan of the Nutritional Recommendations.

²⁷² National Nutrition Guides are available at MoH webpage at:

<https://www.moh.gov.gr/articles/health/dieythynsh-dhmosias-ygieinhs/metadotika-kai-mh-metadotika-noshmata/c388-egkykliai/5030-egkrish-diatrofikwn-systasewn-gia-geniko-plhthysmo-kai-aidikes-plhthysmiakes-omades>

²⁷³ National Dietary Guidelines of Greece for children and adolescents: a tool for promoting healthy eating habits. Kastorini, et al. 2019. Available at: <https://www.cambridge.org/core/services/aop-cambridge-core/content/view/C10A6724412019DE76DA7AA252419359/S1368980019001034a.pdf/national-dietary-guidelines-of-greece-for-children-and-adolescents-a-tool-for-promoting-healthy-eating-habits.pdf>

²⁷⁴ Law 2817/2000, Art. 7. Available in Greek at: <https://www.e-nomothesia.gr/kat-ekpaideuse/n-2817-2000.html>

²⁷⁵ Educational material available in Greek here: <https://www.moh.gov.gr/articles/health/dieythynsh-prwtobathmias-frontidas-ygeias/draseis-kai-programmata-agwghs-ygeias/agwgh-ygeias/entypo-kai-optikoakoystiko-yliko/5840-diatrofikoi-odhgoi>

²⁷⁶ Ministry of Health. "Actions and interventions to raise awareness and inform the student population in the context of Health Education", School Year 2020-2021. Available in Greek at:

<https://www.moh.gov.gr/articles/health/dieythynsh-prwtobathmias-frontidas-ygeias/draseis-kai-programmata-agwghs-ygeias/agwgh-ygeias/draseis-kai-parembaseis-eyaisththtopoihshs-kai-enhmerwshs-toy-mathhtikoy-plhthysmoy/enhmerwsh-drasewn-ana-sxoliko-etos/7616-anaptyksh-ylopoihs-apo-to-ypoyrgeio-ygeias-drasewn-kai-parembasewn-eyaisththtopoihshs-kai-enhmerwshs-toy-mathhtikoy-plhthysmoy-sto-plaisio-ths-agwghs-ygeias-se-ethniko-epipedo-gia-to-sxoliko-etos-2020-2021>.

²⁷⁷ The EU school fruit, vegetables and milk scheme. Annual Monitoring Report. 2018/2019 School Year. Available at: https://ec.europa.eu/info/sites/default/files/food-farming-fisheries/key_policies/documents/el-school-scheme-monitoring-report_2018_2019_en.pdf

²⁷⁸ The EU school fruit, vegetables and milk scheme. Annual Monitoring Report. 2019/2020 School Year. Available at: https://ec.europa.eu/info/sites/default/files/food-farming-fisheries/key_policies/documents/el-school-scheme-monitoring-report_2019_2020_en.pdf

C. Key Conclusions

In terms of **access of children to healthy nutrition**, the following key challenges emerge:

- The right of children to healthy nutrition is not supported by a comprehensive enabling institutional framework.
- There is no comprehensive nutrition policy for children applicable nationwide. Instead, fragmented programmes are implemented for the provision of healthy food inside and outside schools. This may result to the exclusion of children from vulnerable backgrounds (Roma, refugees, immigrants), since access to food provision programs depends on the extent to which their parents or guardians have adequate information on and comply with the eligibility criteria to access each programme.
- There is no systematic data collection on access to healthy nutrition for children at risk of poverty and social exclusion. This creates an additional layer of difficulty to identify specific gaps and needs in order to inform policy making and implement targeted actions.
- Provided that most subsidized food provision and healthy nutrition programs are implemented at schools, children who do not attend school cannot benefit from such programs. These may include **children from Roma communities** that experience high school dropout rates, as well as **asylum seekers**.
- Since food provision programs (*School Meals* and *School Scheme*) are only implemented in pre-selected schools, children in need cannot benefit from the distribution of food if they do not reside in the areas where selected schools are located.
- The *School Scheme* does not consider indicators relevant to poverty, social exclusion and vulnerability of children attending a particular school. Furthermore, given that the Scheme has only been applied to schools in big cities, **children in rural and remote areas** of the country are excluded.
- Limited availability of educational programmes on nutrition, since it only covers one hour per school year. Furthermore, educational activities in the context of the FEAD Program were not implemented at all during the school year 2019-2020, due to closure of schools in light of the COVID-19 pandemic.
- Given that the operation of *Social Groceries* is at the discretion of municipalities and the church, nationwide coverage is not ensured and **children residing in remote or underdeveloped municipalities** may not be adequately covered.
- Food provision applicable at schools (*School Meals*, *School Scheme*, meals distributed in nurseries) are not carried out during school holidays or in any other case schools are closed. Hence, healthy nutrition of children outside school hours relies on their parents' nutritional awareness and financial means to acquire healthy food. This may result in limited access to healthy nutrition for **children from low-income and low-education households**.

- Children of **asylum seekers with second instance negative decisions** on admissibility, asylum seekers whose asylum applications were assessed on merit but later rejected, and asylum seekers whose applications have not yet been registered are particularly vulnerable, since they are in legal limbo and cannot benefit from healthy nutrition programmes applied in and out of schools.
- The School Canteen Policy is beneficial only to students who buy with their own resources products sold in canteens. Students who do not have the financial means to buy products in school canteens or whose school does not have a canteen, are still at risk of consuming unhealthy products bought out of school.
- **Infants whose mothers have low education levels**, as well as **infants of asylum seekers living in refugee camps** are at higher risk of early cessation of breastfeeding.

V. Access to Early Childhood Education & Care and Primary & Secondary Education

This chapter describes the Greek landscape on the provision of and access to ECEC and primary and secondary education, highlights challenges for specific population groups, data gaps, and points to institutional and implementation gaps for adequate and effective access. Greece has recently taken bold steps with initiatives reflecting a clear national commitment to achieving greater equity in educational access. However, one cannot claim success when disability, minority status, language, or digital connectivity are hindering access to learning. An increasingly diverse student body, including high and persistent levels of child poverty, a larger proportion of migrant and refugee students, the presence of shadow, informal education against a resource scarce public financing environment are resulting to significant access barriers and unmet needs.

This chapter will discuss the institutional framework with barriers and operational challenges for specific segments of the child population in Greece, accompanied by data on the take up, accessibility and quality of education. Analysis is structured according to the educational levels operating in Greece, namely early childhood care, primary education including early childhood education, and secondary education.

V.i. Early Childhood Care

A. Enabling policy framework for access to Early Childhood Care

Early Childhood education and care refers to the "*Provision for children from birth though to compulsory primary education, that falls within a national regulatory framework, i.e., which must comply with a set of rules, minimum standards and/or undergo accreditation procedures*".²⁷⁹ Greece has adopted a **dual system of Early Childhood Education and Care (ECEC)**, which distinguishes between early childhood care (ISCED 010) and education (ISCED 020) policies.²⁸⁰

Early Childhood Care (ECC) is provided by public and private infant care centres (*vrefikoi stathmoi*), infant/child care centres (*vrefonipiakoi stathmoi*), child care centres (*paidikoi stathmoi*) and infant/child Centres of Integrated Care (*vrefonipiakoi stathmoi olokliromenis frontidas*). The operation of private ECC centers is regulated by the Ministry of Labour and Social Affairs (MoLSA).²⁸¹ MoLSA is also responsible for the operation of 26 public ECC centers²⁸² across Greece run by its supervised agency Hellenic Manpower Employment Organization (OAED).²⁸³ Public ECC centers are under the supervision of Municipalities²⁸⁴ while funding stems through dedicated national resources through the Ministry of Interior. Municipalities have also

²⁷⁹ European Commission. https://eacea.ec.europa.eu/national-policies/eurydice/content/key-data-early-childhood-education-and-care-europe-%E2%80%93-2019-edition_en

²⁸⁰ As defined in the 2011 *International Standard Classification of Education* (ISCED).

²⁸¹ Ministerial Decision No Δ22/οικ. 11828/293/2017.

²⁸² Law 4144/2013, art. 25. par 3(ιβ).

²⁸³ Law 4144/2013, art. 25. par 1.

²⁸⁴ Joint Ministerial Decision 41087/29-11-2017, as amended by Min. Decision Πρ.Δ11/οικ.26396/920/2020 and P.D. 99/2017.

the competency for granting a license for the foundation and operation of any municipal and private ECC centers.²⁸⁵

Children in Greece do not enjoy free and universal access to ECC centres.²⁸⁶ Accordingly, since ECC is not compulsory, parents are not legally obliged to enrol their children in ECC centres.

Until recently, ECC centres did not benefit from a national curriculum,²⁸⁷ rather guidelines and recommendations with regard to the children's care and daily schedule.²⁸⁸ However, in October 2021 the "kypseli programme" was introduced by the MoLSA with the aim to advance the quality of the educational and care programmes in all infant centers, child centers and child-infant centers.²⁸⁹ The programme targets at the development of the skills and the potential of children as well as the monitoring and assessment of their progress with the objective of early identification of needs through the referral for further investigation of learning difficulties, disability or other disorders. In that context, "kypseli programme" includes a daily curriculum per age group with specific objectives and special tools for the cognitive, learning and psychosocial assessment of children. Additionally, the same law establishes the "National Council of Pre-school Education and Education" which should support the implementation of the "kypseli programme". However, its added value is the provision of a unified operational and managerial framework for the ECC centers given that the competences are divided between Ministries of Labour and Social Affairs and Interior.

Municipalities are not obliged to establish and maintain ECC centres. In 2018, a legal amendment was introduced, enabling Municipalities to request additional funding for the maintenance, equipment and operation of ECC centres.²⁹⁰ Given the decentralized nature of ECC, it is challenging to assess nationally wide reliable data about ECC centres in all 352 municipalities, thus the sufficiency of teacher to infant ratio remains unknown and so are children's unmet needs in terms of access.²⁹¹ Thus, it is not possible to assess whether there is sufficient number of ECC centres in all municipalities across the country.

With regard to the eligibility criteria for enrolment in public ECC centres, in principle it is open to all children residing in the respective municipalities while children residing in a neighbouring Municipality may also be enrolled under exceptional circumstances.

²⁸⁵ Law 3852/2010, art. 94.

²⁸⁶ https://eacea.ec.europa.eu/national-policies/eurydice/greece/access_en

²⁸⁷ Megalonidou, C. The quality of early childhood education and care services in Greece. ICEP 14, 9 (2020). Available at: <https://doi.org/10.1186/s40723-020-00074-2>.

The Greek Statistical Authority started collecting data on the ECC centres only in 2014, with the results of the survey still remaining unpublished as of November 2021.²⁸⁷

²⁸⁸ Joint Ministerial Decision 41087/29-11-2017, Art. 10.

²⁸⁹ Law 4837/2021, art. 13 to 21.

²⁹⁰ Law No. 4520/2018, as amended by art. 23 of Law No. 4659/2020. Available in Greek at: http://www.et.gr/idocs-nph/search/pdfViewerForm.html?args=5C7QrtC22wHUdWr4xouZundtvSoCrlL8lqk9pJn1S_jtIi9LGdkF53Ulx942CdyqxSQYNUqAGCF0lfB9HI6qSYtMQEKEHLwnFqmgJSA5WIsLuV-nRwO1oKqSe4BIOTSpEWYhszF8P8UqWb_zFijEWEC9ec3feQ-2i9M1fDji_8pXojpPw4WxE2U-WedVCO

²⁹¹ The Greek Statistical Authority started collecting data on the ECC centres only in 2014, with the results of the survey still remaining unpublished as of November 2021.²⁹¹

Regarding quality, safety and accessibility of the ECC premises, a comprehensive legal framework was adopted in 2017, including provisions for spaces accessible to children with disabilities. Public ECC centers were given a period of 5 years to comply with the requirements, otherwise their license shall be revoked²⁹². However, given that the technical control is under the responsibility of the relevant local government departments, there is no systematic, centralized data collection about the level of compliance countrywide.

In light of all the above constraints on accessibility and affordability, it should be highlighted that Greece is ranked among the highest three countries in Europe (with Hungary and Romania)²⁹³ in terms of informal child care use. While cultural norms, parental preferences, the presence of family members to provide informal child care and the importance of the nuclear family as primary care giver may account for some of the differences, the significant barriers in terms of coverage, affordability and accessibility merit specific attention and further analysis as determinants in defining a family's decision for childcare. For example, when analysing satisfaction rates, mapped against enrolment and affordability across high income countries, there is a correlation across high income countries (including Greece), for those observing better satisfaction rates for higher enrolment and affordability.²⁹⁴

General enabling policy framework for Early Childhood Care

Since mid-2000s a financial support programme “Harmonization of family and professional life” is available aimed to cover the costs in ECC centers for infants from 2 months to 2,5 years and children from 2,5 years up to their age of 4 as well as older children up to the age of 12 or adolescents in case they have a special condition²⁹⁵. The programme aims at harmonizing family and working life balance, strengthening child protection and is funded by the European Social Fund in the framework of the Partnership Agreement for the Development Framework (ESPA). Beneficiaries of the programme are mainly mothers²⁹⁶ while the selection of beneficiaries is decided by a combination of three parameters:²⁹⁷ the funding sources (Operational Programme under ESPA), the level of funding for each Region, and the evaluation of points collected by each applicant.

Contrary to the point system applied for access to Municipal ECC centers, this point system is applied nationally with the same criteria and terms.²⁹⁸ To this end, three key eligibility conditions are considered for the calculation of points:

- their annual family taxable income²⁹⁹,

²⁹² Ministerial Decree 99/2017. Available in Greek at: <https://edu.klimaka.gr/arxeio/nomothesia-fek/fek-141-2017-pd99-idrysh-leitourgia-dhmotikoi-paidikoi-stathmoi.pdf>

²⁹³ Unicef Innocenti Research Center (2021), Where do rich countries stand on childcare?, pp.14

²⁹⁴ Ibid.

²⁹⁵ Mobility problems or disabilities as defined in Joint Ministerial Decision 78812/14-7-2021, art. 5, par. 1.

²⁹⁶ Joint Ministerial Decision 78812/14-7-2021, art. 4, par. 1 which foresees that also widower fathers or persons that have the custody of the child following a court decision or foster parents or persons who have the auxiliary judicial support (conservatorship) of a person.

²⁹⁷ EETAA, *Analysis of the point-system method and allocation of vouchers*.

²⁹⁸ Regulated by the Joint Ministerial Decision 78812/14-7-2021, art. 8.

²⁹⁹ No income thresholds are applied to a. claimants with children with a disability 2.5-year-olds up to age 6.5; b. claimants with a disability rate above 67%.

- their employment status and employment relation,
- their family status.

Each condition is evaluated in line with a points-system approach, which generally is in favour of applicants with disadvantaged backgrounds.³⁰⁰ Permanent or indefinite time contract employees in the public sector or in Legal Entities of Public Law or in local government (first and second degree) are excluded as beneficiaries of the programme and are only eligible if they have children with disabilities aged from 2.5 to 6.5 years who can enroll to “infant-child centers of integrated support”.³⁰¹ Applicants who satisfy relevant conditions are classified according to their total score points. Beneficiaries are entitled to select the CEC centre of their choice and they receive a voucher of pre-defined amount,³⁰² which guarantees the free provision of services according to the type of the center selected.

The annual income thresholds applied in 2021-2022 were ranging from 33,000 EUR for households with one child, to 42,000 EUR for households with more than five children.³⁰³ For the school year 2020-2021, a total of 145,120 children received a voucher, while 49,11% of the beneficiary parents were unemployed and 34,79% of beneficiary households had annual income below 6,000 EUR. Only 3,23% of beneficiaries had a child with special needs, and 7% were foreign citizens.³⁰⁴

In 2020³⁰⁵, a “complementary programme of access to infant and child centres” was established providing financial support for enrolment of children from 2 months up to 4 years. This programme is funded by the Ministry of Labour and Social Affairs budget. The Joint Ministerial Decision³⁰⁶ specifying the implementation of the complementary programme includes as beneficiaries, mothers of infants and toddlers, mothers of toddlers with disability, and persons who legally exercise the custody of the children who have permanent or indefinite time contracts in the public sector or in Legal Entities of Public Law or in local government (first and second degree) or employees or self-employed in the private sector who cannot be beneficiaries or did not apply for the programme “Harmonization of family and professional life”.

A difference of the complementary programme with the programme “Harmonization of family and professional life” is that the former provides financial support for children only up to their enrolment to compulsory education (4 years old). In terms of the complementary programme eligibility conditions, they remain the same (i.e. a. annual family taxable income, b. employment status and employment relation, c. family status), however applied in a different point system compared to the programme “Harmonization of family and professional life”.³⁰⁷

³⁰⁰ Low income families; claimants with a disability rate above 35%; claimants with children with a disability rate above 35%; widows / widowers; single parent families; divorced or separated parents; families with three children; multi-member families (more than four children); women with a husband with a disability rate above 67%; women with a registered unemployed husband.

³⁰¹ Joint Ministerial Decision 78812/14-7-2021, art. 4, par. 3.

³⁰² During year 2021-2022 the amount was of 180 Euro value.

³⁰³ <https://ypergasias.gov.gr/prosorina-apotelesmata-ton-voucher-vrefonipiakon/>

³⁰⁴ EETAA, *The statistical profile of the beneficiaries under the Programme “Harmonization of family and professional life”*, August 2020, available in Greek at:

https://www.eetaa.gr/enarmonisi/paidikoi_stathmoi_2020/report_ofeloumenes2020.pdf

³⁰⁵ Law 4704/2020, art. 35.

³⁰⁶ Joint Ministerial Decision Δ11/οικ. 32940/1376/2020, 26-08-2020 as amended by Joint Ministerial Decision Δ11/οικ. 37914/1660, 05-10-2020.

³⁰⁷ Joint Ministerial Decision Δ11/οικ. 32940/1376/2020, 26-08-2020 as amended by Joint Ministerial Decision Δ11/οικ. 37914/1660, 05-10-2020, art. 8.

Unmet needs and access barriers

Access to ECC can be challenging for different reasons, ranging from affordability and availability to proximity, opening hours and quality.³⁰⁸ In addition to costs and availability, preferences and social norms may drive childcare choices. Recent research findings show that preferences and cultural norms on motherhood (demand-side factors) alone are not good predictors of childcare use.³⁰⁹ However, affordability and availability (supply-side factors) are structural constraints to childcare use. There are other less obvious barriers to accessing childcare which may affect low income households disproportionately, as travel costs and administrative constraints in applying for childcare benefits.

Children with a physical or mental disability, as well as non-self-serving children are entitled to enrol to ECC, subject to a doctor's certificate, confirming the ability of the respective child to effectively follow the program. If deemed necessary, the Municipal Council may result in the appointment or recruitment of specialized staff or attendant³¹⁰. A legal reform introduced in 2019 stipulates that the cost of the specialized staff or attendant may also be covered directly by the parents of children with special needs.³¹¹ This has caused severe criticism by the National Confederation of People with Disabilities, as it poses serious affordability challenges³¹². In this regard, a report by the Greek Ombudsman shows that, in practice, children with disabilities are often excluded from municipal ECC centres, with the lack of specialized staff being cited as one of the main challenges³¹³.

Upon enrolment, priority is given to children of working parents, children whose parents are unemployed, children of low-income families, and children from vulnerable households (such as orphans, children living with only one parent, children whose parents have a physical or mental disability, children from multi-member families, etc.)³¹⁴. The socioeconomic criteria for the selection and prioritization of children are further specified by the Municipal Council. In the event of rejection of their application, parents have the right to appeal, following subsequent municipality procedures³¹⁵. In light of this, the final selection of children is subject to the discretionary decision-making of the Municipal Council, which may often compromise quality assurance on the equality of the application process and thereby access and inclusiveness within different regions.

³⁰⁸ Eurofound, European Quality of Life Survey 2016: Quality of life, quality of public services, and quality of society, 2017.

³⁰⁹ E. Pavolini and W. Van Lancker, 'The Matthew effect in childcare use: a matter of policies or preferences?', *Journal of European Public Policy*, 2018. 25(6): 878-893.

³¹⁰ Joint Ministerial Decision 41087/29-11-2017, Art. 3, par. 1

³¹¹ Law 4647/2019, Art. 48. Available in Greek at: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/n-4647-2019/arthro-48-nomos-4647-2019-dieykolyinsi-entaxis-paidion-me>

³¹² <https://www.esamea.gr/our-actions/parliament/4471-i-e-s-a-mea-diamartyretai-entona-gia-tin-psifisi-toy-arthroy-48-dieykolyinsi-entaxis-paidion-me-aidikes-anagkes-sto-mathisiako-periballon-sto-sxedio-nomoy-me-thema-katepeigoyses-rythmiseis-armodiotitas-ton-ypoyrgeion-ygeias-esoterikon-ergasias-kai>

³¹³ Greek Ombudsman, "Parallel Report on the Implementation of the UN Convention on the Rights of the Child", November 2019. Available at: https://tbinternet.ohchr.org/Treaties/CRC/Shared%20Documents/GRC/INT_CRC_IFN_GRC_40862_E.pdf

³¹⁴ Joint Ministerial Decision 41087/29-11-2017, Art. 3.

³¹⁵ Idem. Art. 3

Furthermore, a set of supporting documents are required for the registration of eligible children to ECC centers, including health certificate and compulsory vaccination, birth certificate, certificate of permanent residence in the respective municipality, as well as the parents' tax declaration and certificate of employment or unemployment.³¹⁶ The submission of all the required documents may be particularly challenging for children with a migrant or refugee background, children seeking asylum, and Roma children. In the absence of submission of required documents by children from vulnerable groups, the Municipal Council may accept the registration on exceptional grounds. However, the definition of vulnerability, as well as the ultimate decision on admissibility relies on the Municipal Council.

The institutional framework foresees that Municipal Legal Entities responsible for running the ECC structures following a positive opinion by the Municipal Council, "may set criteria for the payment of monthly attendance fees by the families of the accommodated children, in accordance with their financial capacity and in any case regardless of the status of the parents as residents or municipal citizens". In addition, it is provided that "the amount of attendance fees shall be reasonable and symbolic", and that "cases of exemption or reduction of the amount of attendance fees" should be in place.³¹⁷

As far as attendance fees are concerned, Municipal Councils have the right to establish monthly fees as a requirement for children to attend the relevant ECC centers and determine which categories of children would be totally or partially exempt from such fees³¹⁸. There is no legal provision regarding the waiver of fees for children of any specific category. This may again result in discrepancies across municipalities, as firstly the income thresholds may vary considerably and b) there is no harmonized approach in the way accessibility is operationalized. For example, for the school year 2020-2021, the Municipality of Athens did not charge any attendance fees to households whose annual income was less than €20,000, whereas the Municipality of Volos set the annual income threshold at €9,000.

Accordingly, this approach does not ensure a horizontal national framework for automatic access to vulnerable children in socioeconomic terms in municipal ECC centres. For example, children from families benefitting from the GMI or other income related programmes are not considered as de facto falling into the eligibility criteria for prioritization. One point meriting specific attention is that participation rates in early childhood education and care for children in Greece in 2020 are significantly higher for high income households than for low and middle income ones (with a difference of 11 percent).³¹⁹ This, coupled with the discretionary way within which application procedures and fees determination is operationalized, may result in unintended access barriers.

In terms of the transportation of children to and from municipal ECC centers, there is no legal obligation of ECC centers or municipalities to provide transportation or cover its costs. In case the ECC center has its own means of transport, municipal bodies are entitled to require monthly transport fees to be paid by parents or guardians in addition to the monthly attendance fees. There is no legal provision for the exemption of any specific category of children in need. The law only states that the fees should

³¹⁶ Idem. Art. 3

³¹⁷ Joint Ministerial Decision 41087/29-11-2017, Art. 5.

³¹⁸ Idem. Art. 5

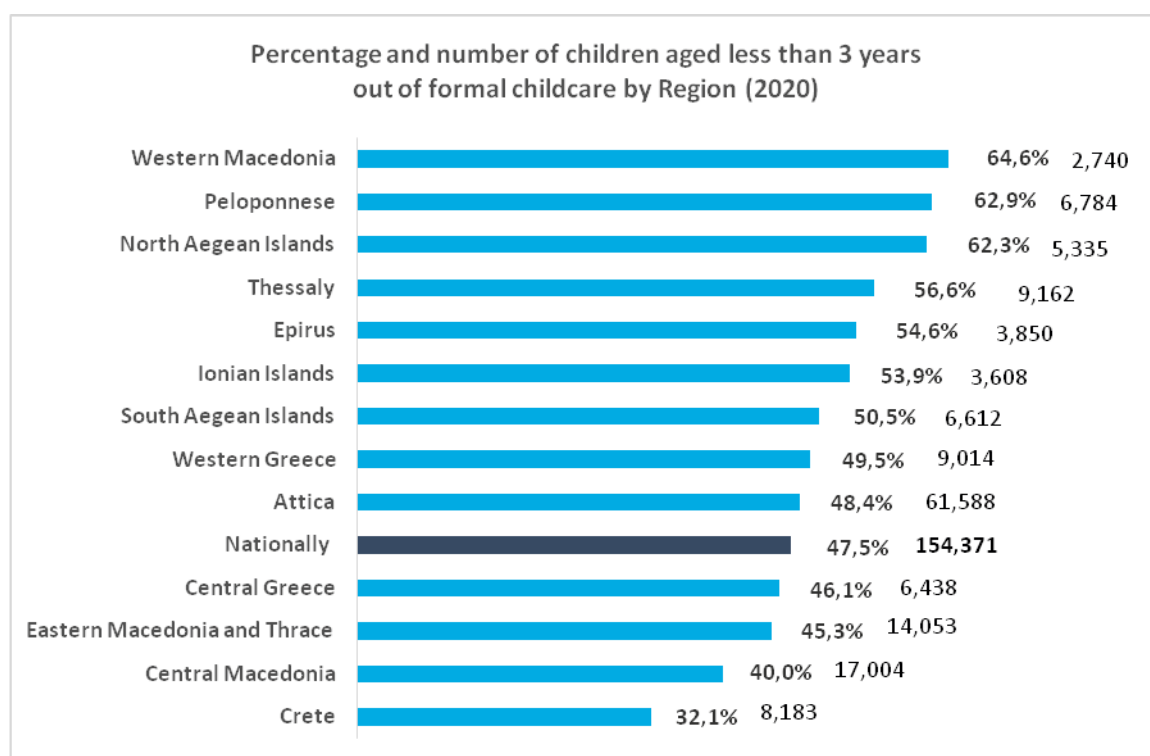
³¹⁹ Unicef Innocenti Research Center (2021), Where do rich countries stand on childcare?, pp.16

be commensurate to the financial capacity of parents. The decision on the specific amount of transport fees and the criteria for full or partial exemption is left at the discretion of each Municipal Council³²⁰, posing again challenges of quality assurance and accountability in terms of access and inclusion.

Low-income families employed under non-standard contracts and/or working non-standard hours in addition to challenges of low income and employment predictability necessary to sustain childcare use, often fail to comply with the regular schedule for drop-off and pick up. Low-wage earners often have to contend with less accommodating and family-friendly policies despite face exacerbated risks as they are more likely to have health care needs, to be single parents and caregivers or have longer commutes.

Data provided by the Hellenic Statistical Authority (see Figure One) indicate that 47.5% of children aged less than 3 years (154,371) at national level are out of formal childcare in 2020. This percentage varied among Regions (NUTS2) in Greece from 32.1% in Crete to 64.6% in Western Macedonia.

Figure 1 Percentage and number of children aged less than 3 years out of formal childcare by region (2020)



Source: ELSTAT, 2021

Affordability is reported as the main reason for access barriers in terms of formal childcare services for 13.7% of parents with children under three years old.³²¹ Another reason for the low participation to formal childcare can be attributed to the increased percentage of children less than 3 years cared only by their parents which

³²⁰ Joint Ministerial Decision 41087/29-11-2017, Art. 6.

³²¹ UNICEF OFFICE OF RESEARCH – INNOCENTI (2019), *Are the world's richest countries family friendly?* Policy in the OECD and EU. p. 16.

has been 50.3% in 2020³²² as well as the participation to other types of childcare (21.3% for more than 30 hours weekly).³²³ The average number of weekly hours of other types of care for the total number of children less than 3 years was 11.3 hours³²⁴ while for children receiving at least one hour of other types of care was 29.7 hours.³²⁵ Additionally, older data for the EU SILC ad-hoc module on access to services (2016), demonstrate that 94.4% of children less than 3 years did not receive formal childcare services³²⁶. Main reasons for not using formal childcare services for children up to 12 years old are affordability and availability (see Table 1).

For the households using paid formal childcare services, the main contributors had been the household itself (59.7%) and the Government or the Local Government (37.3%) as opposed to EU27 averages of 40.2% and 53% respectively.³²⁷ **This finding points to a significant number of households in Greece reporting burdened with the cost of paid childcare services, a cost not covered by other contribution.**

Table 1 Main reasons for not making use of childcare services

Reason	Percentage
Cannot afford it	61.1%
No places available	18.7%
Places available but not nearby	6.5%
Places available but opening hours not suitable	8.1%
Places available but the quality of the services available not satisfactory	5%
Other reasons	0.6%

Source: 2016 Module on Access to services, p. 31.

The Hellenic Statistical Authority (ELSTAT) undertook in 2018, together with the Labour Force Survey - the very first ad hoc survey on reconciliation between work and family life (Labour Force Survey ad hoc module 2018), trying to establish among others whether people who have young children or care for dependent relatives

³²² Eurostat (ilc_caparents)

³²³ Eurostat (ilc_caindothor)

³²⁴ Eurostat (ILC_CAMNOTHALL)

³²⁵ Eurostat (ILC_CAMNOTHG0)

³²⁶ Eurostat (ilc_ats01)

³²⁷ Eurostat (ilc_ats02)

(patients, elderly, etc.) have problems at work (or cannot work) due to the lack of appropriate care services;

While the survey was not focused on formal ECE but adopted a broader definition of childcare services (kindergartens, babysitters, all day schools) and other services for children up to 15 years old, thus extending to ECC, its main findings are of great interest, given that they confirm the limited use of services in Greece and highlight key reasons for not using childcare services, namely:

- i. Childcare services are used by, approximately, one out of three households, as children are taken care of by the respondents and/or their partners. Services are more often used by Greek nationals, as well as by employees.
- ii. The main reason for not using childcare services (not at all or to some extent) is that childcare is arranged informally or/with their partner (48.7%). In many cases, childcare is arranged with relatives (mostly grandparents) or friends (18.2%).
- iii. Support from friends and relatives is more common among Greeks, while self/partner arrangements are more common among foreigners. The cost of services is mostly reported by younger people and migrants.

Table 2 Reasons for not using childcare services

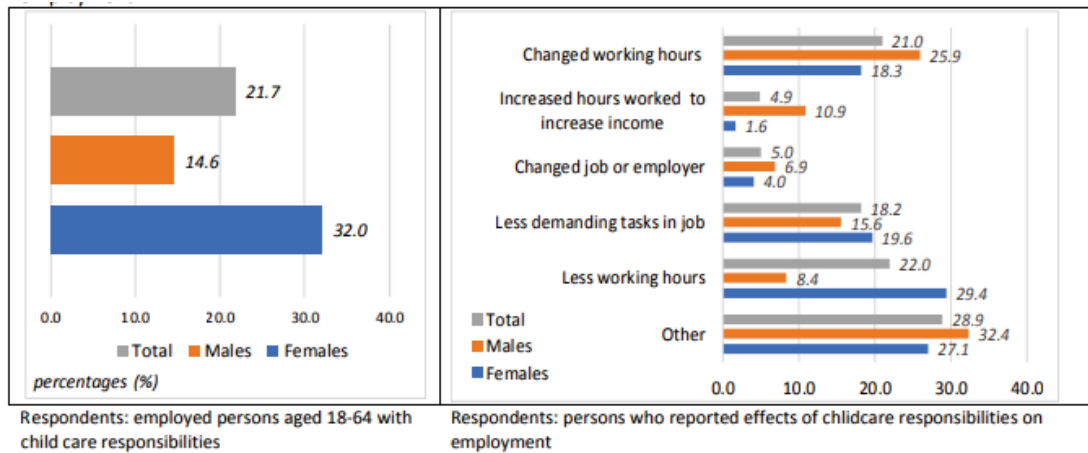
		Care is arranged alone/with partner	Care is arranged including further informal support	Children take care of themselves	Costly	No service accessible /vacant	Service related issues	Other reasons	No answer
<i>% percentages</i>									
Sex	Males	50.5	17.8	15.8	5.1	4.8	3.6	1.8	0.7
	Females	47.1	18.5	15.5	6.4	5.3	3.9	2.0	1.2
Age	15-29	53.9	16.6	1.7	12.7	8.1	5.5	1.6	0.0
	30-34	50.2	21.4	2.4	9.7	7.3	5.8	2.4	0.8
	35-39	49.2	21.9	7.7	7.2	5.3	6.1	1.8	0.7
	40-44	48.4	20.0	17.3	4.2	4.0	2.7	2.4	1.0
	45-54	47.3	13.7	27.2	3.6	3.7	1.7	1.5	1.2
	55-64	48.0	8.4	25.4	3.5	8.5	4.3	0.4	1.5
Nationality	Greek	48.2	19.5	15.6	5.2	5.0	3.6	2.0	1.0
	Foreign	54.9	4.7	16.2	11.9	4.9	5.7	1.2	0.5
Employment status	Employed	42.5	23.1	18.3	4.9	4.9	3.6	1.9	0.6
	Unemployed	59.3	10.4	10.6	7.4	4.4	4.0	2.4	1.6
	Inactive	65.0	4.6	8.9	8.1	5.9	4.2	1.4	1.7

Respondents: parents aged 18-64 using childcare services for some of the children or not using at all

Source: ELSTAT (2019), available at: [Reconciliation between work and family life \(Ad hoc module\)](#)

In addition, as perhaps expected childcare burdens are primarily met by women:

Table 3: Effect of childcare responsibilities on employment and most important effect by gender



Source: ELSTAT (2019), available at: Reconciliation between work and family life (Ad hoc module)

B. Key conclusions

Greece has adopted a dual system of ECEC, distinguishing between non-compulsory early childhood care (ECC) for children aged 0-3 years and compulsory early childhood education (ECE) for children aged 4-5 years. However, since the starting age for entering ECE was extended from 5 to 4 years in 2018 with a transitional implementation period, compulsory attendance for 4-year-olds is not expected to be fully operational until summer of 2022. **This effectively means that during this transition period children aged 3-4 years and their needs remain unaccounted.**

Children aged 0-3 years do not enjoy universal and free access to public ECC services. As a result, available data show that, in 2018, 160 out of a total 352 municipalities were not providing ECC services at all, whereas the rest suffered heavy shortages (more than 100%) in available places. The often inadequate infrastructure has serious repercussions in terms of availability of services and, therefore, is seriously hindering the access to ECC for children who cannot access such services from the private sector (children from low-income families, children living in institutions etc.) and/or for children who need specially adapted ECC services (children with disabilities, children with a migrant background, Roma children etc.). In addition, even when municipal ECC services are actually available, affordability can become a serious issue for low-income families. Municipalities may charge fees, calculated at their discretion, whereas other ECC related indirect costs (transport, teaching material etc.) are also disproportionately burdening the parents.

The following **key challenges** emerge in terms of access of children to ECC services:

- The policy framework in Greece does not make provisions for universal access in ECC centres. Parents may decide to send their children to ECC based on availability of informal family care, cultural preferences, accessibility and affordability constraints. This often results in higher competition for access among low income households, exacerbating risks of exclusion for children most in need.
- There are no specific legal provisions to ensure access to ECC services to all children from low-income families and vulnerable groups, including Roma children living in settlements, children living in refugee camps, and children from migrant backgrounds.
- There is no provision for free attendance and transportation of children to ECC centers, often resulting in significant accessibility concerns. Therefore, children from low-income households and children living in remote areas, Roma settlements or refugee camps are at higher risk of having unmet needs.

- There is no legal obligation for Municipalities to establish and fund ECC centers. Therefore, sufficient ECC services are not provided by all Municipalities countrywide. As a result, children residing in remote or resource challenged municipalities may face higher risk of exclusion. Publicly provided and regulated ECC can facilitate access for low-income families and ensure quality standards in provision. For instance, fee systems, ranging from free to a nominal charge for wealthier parents, would allow public providers to recoup some costs of provision, as well as limit unintended effects on earnings inequality.
- Comprehensive and systematic data regarding ECC services are not collected at a national or subnational level. While evidence points to clear gaps and unmet needs, national wide conclusions are hard to draw and in the absence of comprehensive data, the effectiveness and efficiency of ECC in Greece will remain unknown.
- Discrepancies may arise among children in different municipalities, given the decentralized nature of ECC services and the fact that the decision about the prioritization of children for enrolment is left at the discretion of each Municipal Council.
- Access of children with disabilities to municipal ECC centres is particularly compromised, given the lack of specialized staff and the difficulties to assess compliance of ECC centres with the technical requirements for accessibility of their premises.
- Children with a migrant background and Roma children may face additional barriers, in the absence of required ID documentation, and other supporting documents required for their enrolment at ECC centres.
- From the beginning of the school year, kindergartens provide information (lists) to families about the accompanying material (*e.g., school bags, notebooks, pencils, blocks and painting materials, plasticine, etc.*) needed to be purchased and used by children; this marks an additional cost / burden for the family. There is currently no provision for supporting children in need who are unable to address by family means the costs of educational materials (notebooks, all kinds of stationery, painting materials, etc.) and equipment (school bags etc.).
- Public ECE centres do not provide breakfast or meal to pupils. Their meal is prepared at home under the responsibility of their parents/guardians. Pupils enrolled in ECE centres are not eligible to receive fresh fruit, vegetables and plain milk under the EU school fruit, vegetables and milk Scheme. They are also not entitled to enrol in the 'Hot Meals for Schools' Programme, as it is only applicable to primary educational level.
- Low income families face significant challenges to guarantee their children participation to school-based activities, including school trips, if they are requested to meet the additional costs. As there is no special income supplement to cover such costs, nor statutory guaranteed free access even in the case of compulsory school-based activities, children from low income families may not be able to attend.

V.ii. Primary and secondary education

The education system in Greece includes three levels; primary, secondary and higher education. This section will focus on access barriers at the primary and secondary level.

Education in the primary level and the first cycle of secondary level is compulsory on condition that the pupil is not older than 16 years³²⁸ and lasts 11 years in total. Two years in pre-primary school (children aged 4 and 5 years), six years in primary school and three years in lower secondary education school. Until 2018, only one year of pre-school education has been compulsory. However since the school year 2018-2019 the two year compulsory pre-school education for children aged 4 and 5 years old, has been gradually rolled out and from the school year 2021-2022 it is being fully implemented across all municipalities in Greece.³²⁹

Primary education is provided at kindergarten and primary school; first cycle of secondary education is provided at lower secondary school (gymnasio); second cycle of secondary education is provided at upper secondary school (high school-lykeio)³³⁰ and at technical-vocational schools.³³¹ There is a special clause in legislation to reinforce access of children to education whereby whoever has the custody of an underage pupil and fails to ensure their enrolment or supervision of their attendance at school can be subject to sanction.³³²

Specific Measures Promoting Accessibility for Children in need

There are specific legal provisions in place to facilitate access to primary and secondary education for specific groups of children who are facing increased challenges in terms of their enrolment and attendance.

Documentation required for the enrolment to primary education includes a. birth certificate, b. vaccination booklet that certifies that all foreseen vaccines have been done, the ADYM (Pupil's Personal Health Booklet)³³³, a document that certifies the permanent home address of the pupil, and a certificate of study in kindergarten in case of enrolment to primary school.³³⁴ There are also specific provisions for the **enrolment of children belonging to vulnerable groups:**

- a. they should be accepted for enrollment regardless of their registration to the municipal registries,
- b. school principals should encourage their enrollment and facilitate their identification in their respective neighborhoods,
- c. for children "on the move",³³⁵ enrollment should not be hindered by the absence of permanent home address certificate

³²⁸ Law 1566/1985, art. 2, par. 3.

³²⁹ Law 4521/2018, art. 33, par. 3 that amended Law 1566/1985, art. 3, par. 3 and 4.

³³⁰ Types of high schools provided by law are: general, classical, ecclesiastical, technical - vocational, general multidisciplinary high schools.

³³¹ Law 1566/1985, art. 2, par. 1 and 2.

³³² Law 1566/1985, art. 2, par. 3.

³³³ ADYM is among the documentation required for enrollment to kindergarten, to the first and fourth grades of primary school, and to the first grades of lower and upper secondary school. Joint Minister Decision No. 6/304/75662/Γ1/ 21.5.2014, art. 1 and 4.

³³⁴ PD. 79/2017, art. 5, 6 and 7.

³³⁵ P.D. 79/2017, art. 6, par. 12 and art. 7, par. 14.

- d. in the absence of the required vaccinations for entering school, vulnerable children should be provided with the necessary medical attention to for their completion, enabling the issuance of ADYM and thereby acceptance to school.
- e. Lastly, enrollment to the non-compulsory all day school programme is administered without any conditions.³³⁶

Pupils who **reside at an area not in the proximity of the school** should be transported or be accommodated and provided with food for free at the area where the school is located. In the absence of transportation or accommodation possibilities, a monthly benefit is provided.³³⁷ Based on this provision, a relevant policy³³⁸ is implemented in 13 Regions without any means test on family income and property. Transportation can be carried out by:

- a. special student card with public transportation means,
- b. by vehicles owned by local governments (Municipalities and Regions), or
- c. by a public service provision contract (leasing of vehicles) managed by the Regions.³³⁹

In case none of the three transportation modalities is feasible or financially cost effective, a monthly benefit of 85 € per pupil is provided if the pupil(s) have moved to a house close to the location of the school for the sole reason of attending it, while a mileage reimbursement of 0.35 €/kilometre is provided in case parents or legal guardians of the pupil have taken over the transportation of pupil to school by their own means.³⁴⁰

Since 2008, special education constitutes an integral part of compulsory and free education in all education levels.³⁴¹ Based on the institutional framework, **pupils with disabilities and special education needs** can attend:

- a. a mainstream class supported by the teacher of the class, on condition that they have mild learning difficulties,
- b. mainstream class receiving parallel support-coeducation by special education teachers, depending on the type and the degree of the special education needs,
- c. specially organized and suitably staffed integration classes supported by special education teachers.³⁴²

Pupils with disabilities and special education needs who are not self-sufficient attend special education schools or integration classes with the required support and the presence of Special Support Staff, depending on the type of disability and the special education needs.³⁴³ Additionally, home teaching is foreseen when is deemed necessary in case of health problems prohibiting movement of the pupil to school.³⁴⁴

³³⁶ Circular Φ.6/ 22511/Δ1, 25-2-2021, section B.

³³⁷ Law 1566/1985, art. 2, par. 9.

³³⁸ Policy developed by the Ministries of Interior, MoERA, Finance, and Transport and is regulated by the Joint Ministerial Decision No. 50025/19.9.2018.

³³⁹ Joint Ministerial Decision No. 50025/19.9.2018, art. 2.

³⁴⁰ Joint Ministerial Decision No. 50025/19.9.2018, art. 3.

³⁴¹ Law 3699/2008, art. 1, par. 1.

³⁴² Law 3699/2008, art. 6, par. 1.

³⁴³ Law 3699/2008, art. 6, par. 2.

³⁴⁴ Law 3699/2008, art. 6, par. 4y.

There is also focus on the implementation of co-education programmes of special education schools with mainstream schools.³⁴⁵

The legal framework provides for the implementation of early intervention programmes, special pre-primary schools³⁴⁶ while the Pedagogical Institute of the Ministry of Education would design those early intervention programmes. However, this provision has not been is yet to be implemented.

Pupils with disabilities and/or special educational needs must be guided by Special Education teachers. This discipline is clearly defined in Article 16 of Law 3699/2008 and relates to high academic qualifications (PhD or post-graduate degree) or long experience (at least 5 years of service in SE). In addition, children with hearing and visual disabilities must be taught by teachers with a certified knowledge of Greek Sign Language or Braille respectively.

The Centers for Educational and Counseling Support (KESY) were renamed to **Centers for Interdisciplinary Assessment, Counseling and Support (KEDASY)** in August 2021³⁴⁷ and their aim is to support students and schools in their area of responsibility to “*ensure equal access for all students without exception to education and their harmonic psychosocial development and progress*”.³⁴⁸ KEDASY are responsible for the investigation and assessment of educational and psychosocial needs, provision of guidance and counseling to parents, and relevant support to schools. Among others, KEDASY have the exclusive responsibility for an opinion on the enrollment, transfer and study of students with disabilities or special educational needs in the appropriate school unit, as well as for the appropriate context for their individualized support i.e. parallel support or integration class in a general education school.³⁴⁹

Zones of Educational Priority (ZEP) are integrated in schools operating in areas “*with low overall educational index, high school dropout and low access to higher education, as well as low socio-economic indicators...*” with the aim to ensure “*equal integration of all students in the educational system, through the operation of supportive actions to improve learning performance*”.³⁵⁰ Operationally, Reception Classes are established to serve this purpose which aims to enhance active participation and effective learning for primary and secondary education students who **do not hold the required level of attainment of the Greek language** (Roma, third country nationals, Greek repatriate, refugees, students from vulnerable groups, etc.) in order to integrate them effectively into the Greek educational system.³⁵¹ The **Reception Classes ZEP include two cycles (ZEP I and ZEP II)**.

Students with a minimum or zero level of competence in the Greek language attend ZEP I Reception Classes where an intensive Greek language learning programme is provided while some of the subjects (physical education, music, arts, foreign language or any other lesson upon decision of the union of teachers of the school)

³⁴⁵ Law 3699/2008, art. 6 par. 6 as amended by law 4368/2016, and Ministerial Decision 172877/Δ3/17-10-2016 as amended by Ministerial Decision 10537 /Δ3 23-01-2019.

³⁴⁶ Law 3699/2008, art. 8, par. 2.

³⁴⁷ Law 4823/2021, art. 11, par. 1.

³⁴⁸ Law 4823/2021, art. 11, par. 2.

³⁴⁹ Law 4823/2021, art. 11, par. 5.

³⁵⁰ Law 3879/2010, art. 26, par. 1a.

³⁵¹ Ministerial Decision No Φ1/63691/Δ1/2017, 25-4-2017, art. 2.

are attended in the mainstream class. Attendance to ZEP I Reception Class can last for a teaching year while there is a possibility for extension.

ZEP II Reception Classes are attended by students with an average level of competence in the Greek language that may cause difficulties in mainstream class attendance. Students attending ZEP II Reception Classes receive support in Greek language learning in addition to occasionally other subjects. The modality of support can be either in the mainstream class with parallel teaching provided through a second teacher or outside the mainstream class. Attendance to ZEP II Reception Class can last up to three teaching years and students that have already attended these classes cannot return back to them. Additionally, students that can attend the mainstream class without an issue can leave ZEP Reception Classes earlier than planned following a relevant assessment and recommendation by the teachers.³⁵²

The prerequisite for the establishment of ZEP I and II Reception Classes is a minimum number of 9 students.³⁵³ Assessment tests on the Greek language knowledge are used to determine the placement of students. In addition to the verification tests, a decision of the Union of teachers of the school is required as well as a signed statement of parents or guardians confirming consent of their child to attend the ZEP I or II Reception Class.³⁵⁴ Students who have attended DYEP classes and have been granted the foreseen certificate of study should be exempted from the performance of verification tests and they are allocated to ZEP I or ZEP II Reception Classes based on a decision from the union of teachers of the school.³⁵⁵

The legal framework in Greece provides for the access to education of **third country national children** regardless of their legal status and the documentation hold for enrolment to education.³⁵⁶ Children granted **international protection** status are obliged to participate in primary and secondary compulsory education schools under similar conditions as Greek nationals.³⁵⁷

Asylum seeking children and children of asylum seekers during their stay in Greece are obliged to participate in schools of primary and secondary education of the public education system³⁵⁸ within three months of completion of their identification procedures. Facilitation is foreseen on their enrolment at school in terms of the documentation required, as limited documentation³⁵⁹ for enrolment is foreseen compared to mainstream pupils while, additionally, they have the possibility to enrol with missing documentation.³⁶⁰

As measures to ensure enrolment and attendance to education, the discontinuation of material reception conditions and the same sanctions subject to Greek nationals are foreseen.³⁶¹ Additionally, it is provided that access to secondary education shall not be withheld for the sole reason of the child reaching the age of maturity.³⁶²

³⁵² Ministerial Decision No Φ1/63691/Δ1/2017, 25-4-2017, art. 3.

³⁵³ Ministerial Decision No Φ1/63691/Δ1/2017, 25-4-2017, art. 6.

³⁵⁴ Ministerial Decision No Φ1/63691/Δ1/2017, 25-4-2017, art. 4.

³⁵⁵ Ministerial Decision No No Φ1/63691/Δ1/2017, 25-4-2017, art. 4 as amended.

³⁵⁶ Law 4251/2014, art. 21, par. 7 and 8.

³⁵⁷ Law 4636/2019, art. 27, par. 1.

³⁵⁸ Law 4636/2019, art. 51, par. 1.

³⁵⁹ The asylum seeking card or any document that ensures the certification of the pupil, the ADYM and an international vaccination certificate.

³⁶⁰ Law 4636/2019, art. 51, par. 1 and 2.

³⁶¹ Law 4636/2019, art. 51, par. 2.

³⁶² Op. cit., par. 1.

Education to refugee children is provided by primary and secondary education schools,³⁶³ however taking into consideration “*the particular needs of the refugee population as a result of mobility, the time of arrival, the duration of their stay in the accommodation facilities, as well as the size of the pupil population*” Reception Structures for Refugee Education (DYEP), can be established.³⁶⁴

DYEP’s are operating in the framework of the formal education system, yet they are applying specialized education programmes for a limited period of time. DYEP’s are taking place in public education primary and secondary schools,³⁶⁵ neighbouring to camps or other types of accommodation facilities. Under special circumstances,³⁶⁶ when the accommodation centre is not in the proximity of the school, primary or lower secondary education (for children 6 to 15 years), school branches can be established within accommodation centres.³⁶⁷ For the education of children aged 4 and 5, kindergartens are established within accommodation centres.³⁶⁸ DYEP classes that take place in public education schools are operating in a separate timeframe (from 14.00 to 18.00)³⁶⁹ than the mainstream classes and can last one teaching year with the possibility of an extension for an additional year.³⁷⁰ Upon completion of the study in DYEP, a certificate of study is provided which certifies the duration of study.³⁷¹

Support to **children in detention** to access education is provided through the establishment of primary and secondary education schools within detention centres and the Institution for the Education of Juvenile Boys of Volos.³⁷²

Members of the special education staff belonging to the specialization of **psychologists (PE23) and social workers (PE30)** may be deployed at specific schools of general and vocational education “*in case there is a particular need for supporting vulnerable social groups or the implementation of psychosocial and emotional support programmes for students is deemed necessary*”.³⁷³ Based on relevant Ministerial Decisions the schools that psychologists and social workers are deployed in each school year are specified. However, this is not permanent staff as it’s funded through the Partnership Agreement for the Development Framework (ESPA) on a yearly basis. In 2020, based on the need to support schools to address the impact of COVID-19, an additional framework of deployment of psychologists and social workers to general education primary and secondary schools was established.³⁷⁴ Based on the Deputy Ombudsperson for Children, their contribution has been challenging as among other reasons “*they are not allowed to have exploratory initial sessions with children and/or adolescents and thus abuse or maltreatment reporting is obstructed*.”³⁷⁵

³⁶³ Law 4547/2018, art. 72, par. 1.

³⁶⁴ Law 4547/2018, art. 72, par. 2.

³⁶⁵ Joint Ministerial Decision No. 180647/ΓΔ4/31.10.2016.

³⁶⁶ Joint Ministerial Decision No. 180647/ΓΔ4/31.10.2016, art. 1, par. 3.

³⁶⁷ Joint Ministerial Decision No. 180647/ΓΔ4/31.10.2016, art. 1, par. 3.

³⁶⁸ Law 4547/2018, art. 72, par. 3.

³⁶⁹ Joint Ministerial Decision No. 180647/ΓΔ4/31.10.2016, art. 4.

³⁷⁰ Law 4547/2018, art. 73, par. 2.

³⁷¹ Law 4547/2018, art. 73, par. 4.

³⁷² Law 4763/2020, art. 74 and 75.

³⁷³ Ministerial Decision No 142628/ΓΔ4, 04-09-2017, art. 1.

³⁷⁴ Ministerial Decision No 142524/ΓΔ4, 26-10-2020.

³⁷⁵ Greek Ombudsman, “[Parallel Report on the Implementation of the UN Convention on the Rights of the Child](#)”, November 2019, p. 34.

Lastly, it is also important to highlight the integration of access to education with broader social policy measures. In order to promote access to education, one of the requirements for families with children to register for the Guaranteed Minimum Income and the Housing Subsidy is to provide for their children an enrolment to education certificate for the current year as well as having adequately attended education during the past year.³⁷⁶

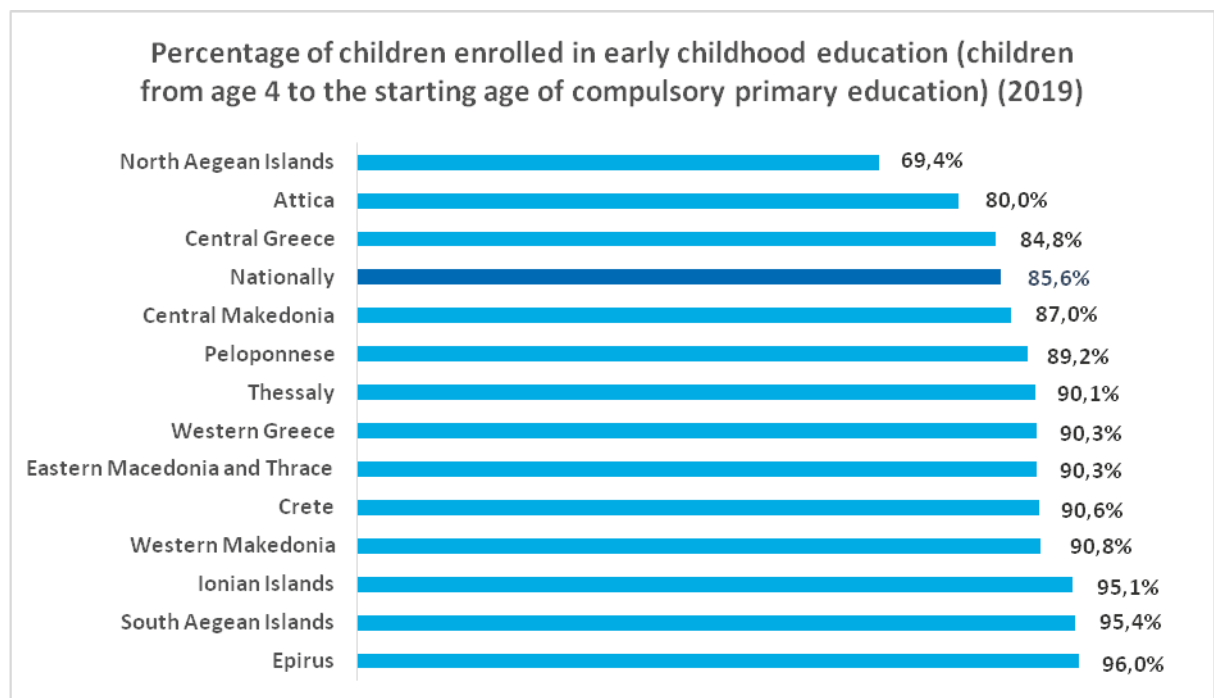
A. Main data

Pre-school education (ECE)

In 2019, 85.6% of children aged 4 and 5 were enrolled to pre-school education nationally, below the EU-27 average (95.1%) and far from the ET2020 benchmark of 95%. However, this national rate is increased by 10.4 percentage points compared to the previous year (75.2% in 2018) due to the gradual rollout of the two-year compulsory pre-school education that is taking place since school year 2018-2019 and should be fully implemented in school year 2021-2022.

In terms of access to pre-school education, data reveal regional disparities, however they are believed to be transitional due to the gradual rollout of the two years compulsory pre-school education and are expected to be resolved when this policy measure is fully implemented in year 2021-2022.

Figure 2 Percentage of children enrolled in ECE, 2019



Source: ELSTAT, 2019

As an absolute number of pupils accessing primary education, according to ELSTAT, during school year 2019-2020, 786,014 pupils were enrolled (164.716 in

³⁷⁶ Joint Ministerial Decision No Δ13/οικ./33475/1935/2018, 15-6-2018, art. 4, as amended and Joint Ministerial Decision No 71670/2021, 29-9-2021, art. 5.

kindergartens and 621.298 at primary schools).³⁷⁷ No similar data are available for secondary education. Based on the UNESCO Institute of Statistics,³⁷⁸ net enrolment rate³⁷⁹ for primary education has been 98.5% in 2019 and 96.7% for secondary education which reveals a very high take up of education services rate. In addition, the effective transition rate from primary to lower secondary general education in 2018 has been 99.5%. However, the number of out-of-school children (not enrolled or attending school) in 2019 amounted to 5,679 while the number of out-of-school adolescents to 10,238.

Only 1% of households in Greece reported unmet needs for formal education during personal interviews for the 2016 Module on Access to Services.³⁸⁰ Main reasons for non-participation in formal education were inability to afford it (66%) and time constraints (25.5%) (see Table). However, it needs to be highlighted that these figures concern “education provided in the system of schools, colleges, universities and other formal educational institutions”³⁸¹ and does not only include compulsory education, which means that safe conclusions on the reasons affecting non-attendance to primary and secondary education remain difficult to draw.

Table 6 Main reasons for non-participation in formal education – Greece and EU (2016)

Reason	Greece	EU
Cannot afford it	66%	31.71%
Time constraints	25.8%	36.61%
Not admitted to the course programme	2.7%	5.18%
No suitable course available	5.5%	26.5%
Other reasons	0.1%	

Source: European Commission (2016), 2016 EU-SILC MODULE "Access to services".

Primary and secondary education

Data from the Institute of Educational Policy among 2014 and 2017³⁸² demonstrate that school drop-out in Greece has been 1.79% in the first three grades of primary school, 1.54% in the rest three grades of primary school, 4.62% in day lower secondary school (gymnasio), 1.65% in day general lyceum (upper secondary education) and 8.94% in day vocational lyceum (upper secondary education).

³⁷⁷ ELSTAT, 2021, Surveys on pre-primary and primary education - end of school year 2019-2020.

³⁷⁸ UNESCO Institute for Statistics (UIS)

³⁷⁹ According to UNESCO is defined as: Total number of students of the official age group for a given level of education who are enrolled in any level of education, expressed as a percentage of the corresponding population.

³⁸⁰ European Commission (2016), 2016 EU-SILC MODULE "Access to services". p. 36.

³⁸¹ Op.cit., p. 5.

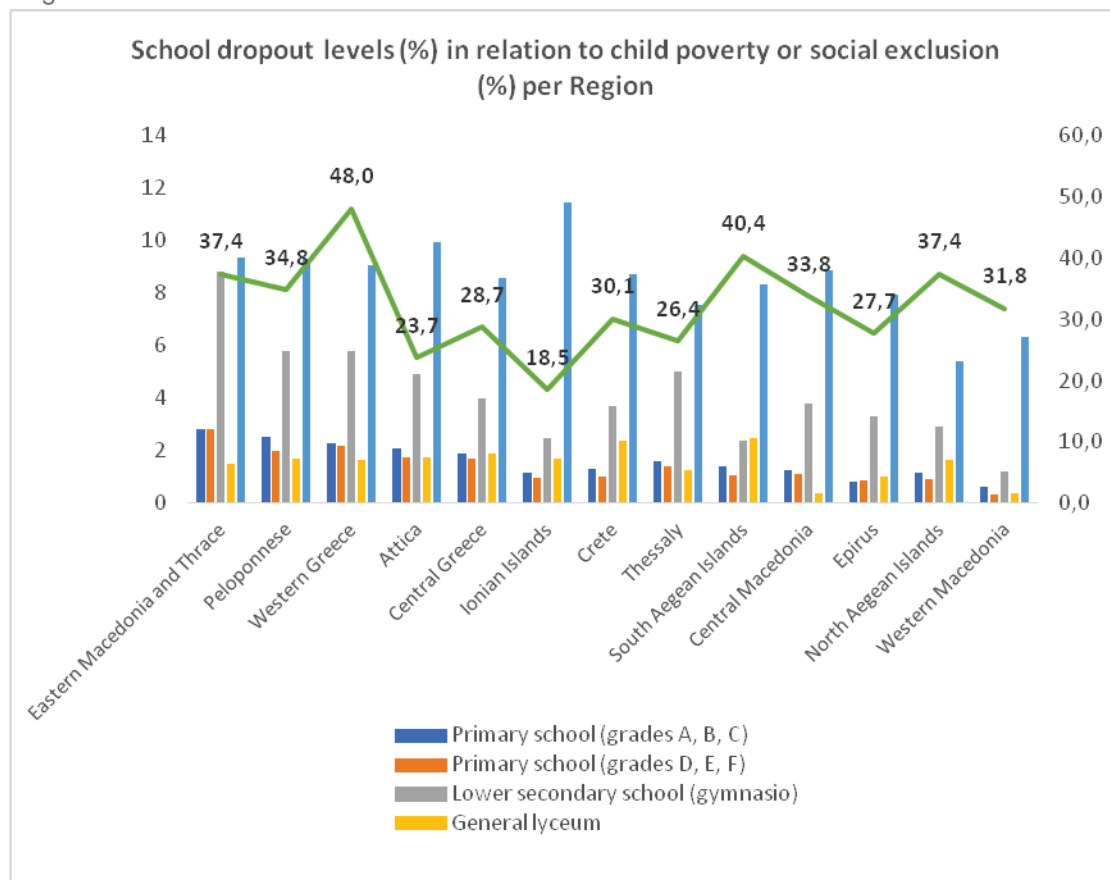
³⁸² Institute of Educational Policy (2019), School drop-out in Greek primary and secondary education – reference period 2014-2017, p. 8.

Table 7 School drop-out per type of school

School drop-out per type of school (2014-2017)	
Primary school (grades A, B, C)	1.79%
Primary school (grades D, E, F)	1.54%
Day lower secondary school (gymnasio)	4.62%
Day general lyceum	1.65%
Day vocational lyceum	8.94%

Source: Institute of Educational Policy (2019), School drop-out in Greek primary and secondary education – reference period 2014-2017.

In terms of regional disparities, the Regions of Eastern Macedonia and Thrace, Peloponnese, Western Greece and Attica had the highest drop-out rates for all types of schools assessed by the IEP study. It seems also that many Regions with higher school dropout levels follow patterns of increased child poverty or social exclusion levels.

Figure 3 School dropout levels in relation to child poverty or social exclusion (2020) per Region


Source: Institute of Educational Policy (2019), School drop-out in Greek primary and secondary education – reference period 2014-2017, and ELSTAT (2020).

Out of pocket payments and shadow Education in primary and secondary education levels

Shadow (informal) education is referred to primarily under two forms: (a) the 'group private schools' called *Frontistiria* i.e. "a term that refers to the activity of supplementary education offered outside the formal (state or private) schools and (b) private lessons known as *idietera mathimata*."³⁸³

Greece ranks persistently high across OECD countries in terms of time spent per week in after-school classes provided by a commercial company or an individual³⁸⁴ and paid out of pocket by the parents. Additional evidence also points to gaps in uptake between students who are in the bottom quarter of economic, social status and those in the top quarter was among the largest captured.³⁸⁵

Research on shadow education in Greece has analyzed the attitudes of school teachers, students and parents towards complementary tutoring in addition to the incentives and trends over the decade of the financial crisis.³⁸⁶ Yet, the educational improvement met by shadow education continues to be contested and has not been the subject of comprehensive assessment in Greece: a question beyond the scope of this study.

However, given the significant costs that families are asked to meet largely at the secondary education level - as the attendance to complementary private education peaks at the respective school years (Tables 8 and 9) - concerns over: the supply and demand for services, accessibility, quality and affordability of education, come at play. Inadvertently, the "use of shadow education redefines the role of the state in the formation of educational policy", with the risk of encouraging a parallel educational system and restricting access to quality education for low income households.

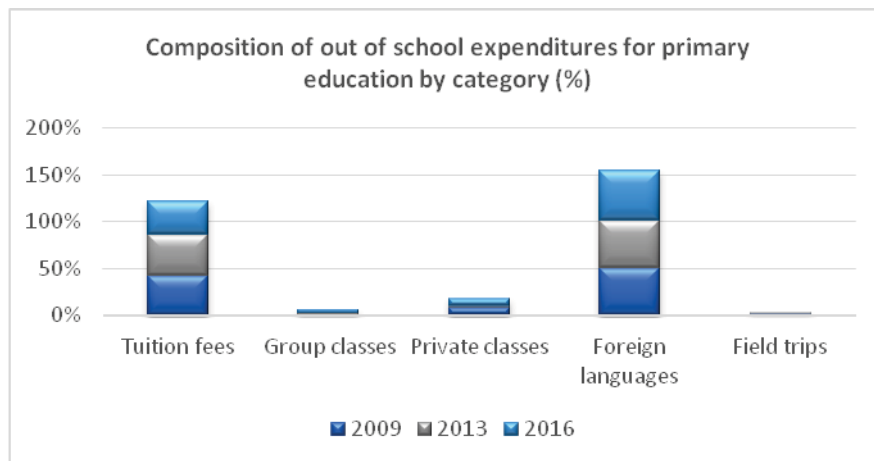
³⁸³ Kassotakis et al.(2013), Shadow Education in Greece, Characteristics, Consequences and Eradication Efforts, in book [Private Tutoring Across the Mediterranean \(pp.93-113\)](#)

³⁸⁴ OECD (2018), Education for a Bright Future in Greece, Reviews of National Policies for Education, OECD Publishing, Paris <http://dx.doi.org/10.1787/9789264298750-en>

³⁸⁵ Eurydice (2016), Greece: Early Childhood Education and Care, https://webgate.ec.europa.eu/fpfis/mwikis/eurydice/index.php/Greece:Early_Childhood_Education_and_Care

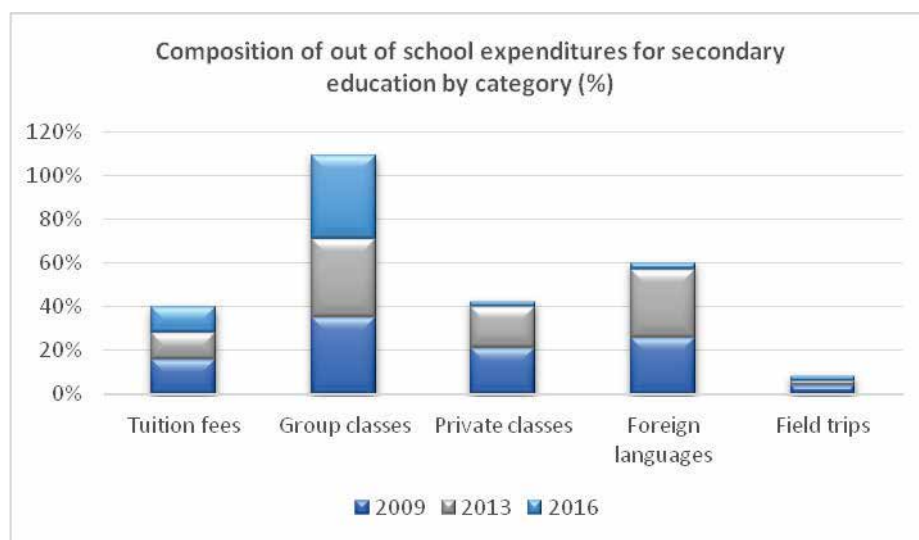
³⁸⁶ For detailed studies on the subject see: Kelpanidis M. Polymili K. (2012). The prevalence of tutoring and the depreciation of the school in Greek education: Survey of pupils who attend shadow education in urban and semi-urban areas of Thessaloniki. Nea Pedia, Panagiotopoulou, K. (2016). Students' view of the institution of tutoring and its impact on learning and teaching mathematics in the classroom. (Master Thesis, National and Kapodistrian University of Athens, Greece). (In Greek), Liodaki, N. and N. Liodaki (2016). Some Effects of the Economic Crisis on Shadow Education in Greece, paper presented at the International Conference in Contemporary Social Studies,

Table 8 Composition of out of school expenditures for primary education



Source: EOP, Survey of Family Budget, Center for Liberal Studies - Markos Dragoumis (KEFiM), Education: What Greeks pay, September 2018

Table 9 Composition of out of school expenditures for secondary education



Source: EOP, Survey of Family Budget, Center for Liberal Studies - Markos Dragoumis (KEFiM), Education: What Greeks pay, September 2018

Previous educational reviews have recommended that a systematic investigation of the educational impact of shadow education in Greece could “*create a solid basis for a public debate on the meaning and purpose, distribution and impact of shadow education*”.³⁸⁷ In the absence of such a review, its impact alongside the potential synergies between private and public sector, beyond the obvious affordability barriers, will remain unknown.

³⁸⁷ OECD (2018), op. cited, pp.115

Digital access and connectivity

Support to children in need for accessing digital educational tools is provided in principle by the "Digital Support" ("Psifiaki Merimna") Programme,³⁸⁸ a program introduced in 2021,³⁸⁹ to support families with dependent children, who attend educational structures in the country, through a system of vouchers³⁹⁰ available for the purchase of technological equipment. It aims at supporting the educational process with modern digital media, which can be used in conditions of technologically enriched educational life, as well as distance learning, facilitating children's access to digital educational material and further enhancing their digital skills.³⁹¹ Its implementation has been undertaken by "Information Society S.A.", a company supervised by the Ministry of Digital Governance, according to a Program Agreement signed by it and MoERA on 23.12.2020.

The Programme gives priority to children and young people (4-24 years) attending compulsory and non-compulsory education who are at risk of extreme income poverty, but eligibility conditions differ according to relevant implementation phases. Based on UNIWA's primary research, during the first and second implementation phase (5.4.2021 - 30.7.2021, 10.6.2021 – 30.7.2021), eligibility was focused exclusively on families that receive the child allowance³⁹² by the Organization for Welfare Allowances and Social Solidarity (OPEKA) for the year 2020, and are included in the first income category, based on their calculated equivalent family income (i.e. their annual family income is up to € 6.000). In addition, the Programme supports children with disabilities, until the completion of the 24th year of their age, providing that they have a disability rate of 67% or more.

During the third implementation phase (7.9.2021 - 15.10.2021), eligibility was extended to large families and families with at least a dependent child with a disability, under the following conditions: i. they receive the child allowance as type b' and c' beneficiaries; ii. have more than three dependent children or at least a dependent child with a disability who receives disability allowances.

Additionally, MofERA introduced in 2020 - as the Greek education system's response to the COVID-19 pandemic for vulnerable children and families - a new policy to promote access to distance learning: To facilitate access to digital education resources, the MofERA, in collaboration with mobile network providers, ensured free access to digital resources through telephone landlines, mobile phones and tablets;

The MofERA issued specific guidelines for providing distance learning to students with special educational needs and staff from the Educational and Counselling

³⁸⁸ Ψηφιακή Μέριμνα (digital-access.gov.gr).

³⁸⁹ Joint Ministerial Decision No. 30746, 17-3-2021 of the Ministers of Finance, Development & Investments, MofERA, Labour & Social Affairs, as amended by Joint Ministerial Decision 105840/A2, 1-9-2021.

³⁹⁰ Eligible parents receive, after the evaluation of their application, a check of 200 euros for each dependent child aged 4 to 24, who attends the relevant eligible educational structures in Greece.

³⁹¹ The Programme will provide 645,000 vouchers (a number that exceeds the estimated number of potential beneficiaries), and is financed with € 129,000,000 by the Public Investment Programme (PIP) of MofERA, with the possibility of further funding by the Greek Resilience and Recovery Fund (RRF)

³⁹² In order to define the eligible families, the scheme determines three categories of equivalent family income. This first category is up to 6.000€. The second category comprises families with income 6.001€ up to 10.000€. The third category consists of families between 10.001€ to 15.000€.

Support Centers continued to support schools and children with special educational needs remotely;

- Digital features to enable access for those with disabilities were added to the digital learning platform;

Table 10 The statistical profile of the "Digital Support" Programme (2021)

Number of claims	Number of approved claims	Number of provided vouchers
359.518	292.322	291.478

Source: Project Team field research analysis, October 2021.

Despite the comprehensiveness in terms of targeted provisions³⁹³ addressing vulnerabilities of specific groups of children, the recent adoption of the program does not allow for an accurate assessment in terms of coverage and target groups and certain points merit specific attention as they create barriers to certain families not able to address relevant needs by their own means. Namely:

- Families with dependent children in need are excluded if their annual income exceeds the maximum eligibility ceiling for type a' benefit (6.000 €), as evidenced by analysis of available data.

Table 11 The statistical profile of the Child Benefit scheme (2020)

Category of annual equivalent income	Number of applications	Number of children	Total amount of the subsidy in €	Annual Average amount per child
1-6.000 €	378.396	680.793	599.554.490	880 €
6.001-10.000 €	294.915	497.023	254.644.660	512 €
10.001-15.000 €	215.013	363.084	124.254.526	342 €
	888.324	1.540.900	978.453.676	635 €

Source: University of West Attica Research Team, June 2021

- Families with dependent children in need are excluded if their annual income exceeds the maximum eligibility ceiling for type c' benefit (15.000€)
- Families with at least a dependent child are excluded if their child does not receive any OPEKA disability allowance and their annual income exceeds the maximum eligibility ceiling (15.000€).

³⁹³ Defined based on the eligibility conditions in Joint Ministerial Decision No. 30746, 17-3-2021, art. 4.

d) The majority of children with a migrant background are excluded (RSA, 2021) if they do not satisfy the child benefit eligibility conditions:³⁹⁴ 5 years of permanent, uninterrupted and legal stay in Greece (EU citizens, refugees, stateless persons, beneficiaries of subsidiary protection) or 12 years of permanent stay in Greece (third country nationals).

Table 12 Beneficiaries of the Child Benefit scheme by nationality (2020)

Nationality	Number of households	Average amount (per month)
Greek citizens	798.191	95 €
EU and EFTA countries citizens	11.311	101 €
Third country nationals - refugees etc.	76.793	118 €

Source: University of West Attica Research Team, June 2021

B. Institutional Challenges

Challenges on access to primary and secondary education for specific groups of children

5.2.1 Refugee and migrant children

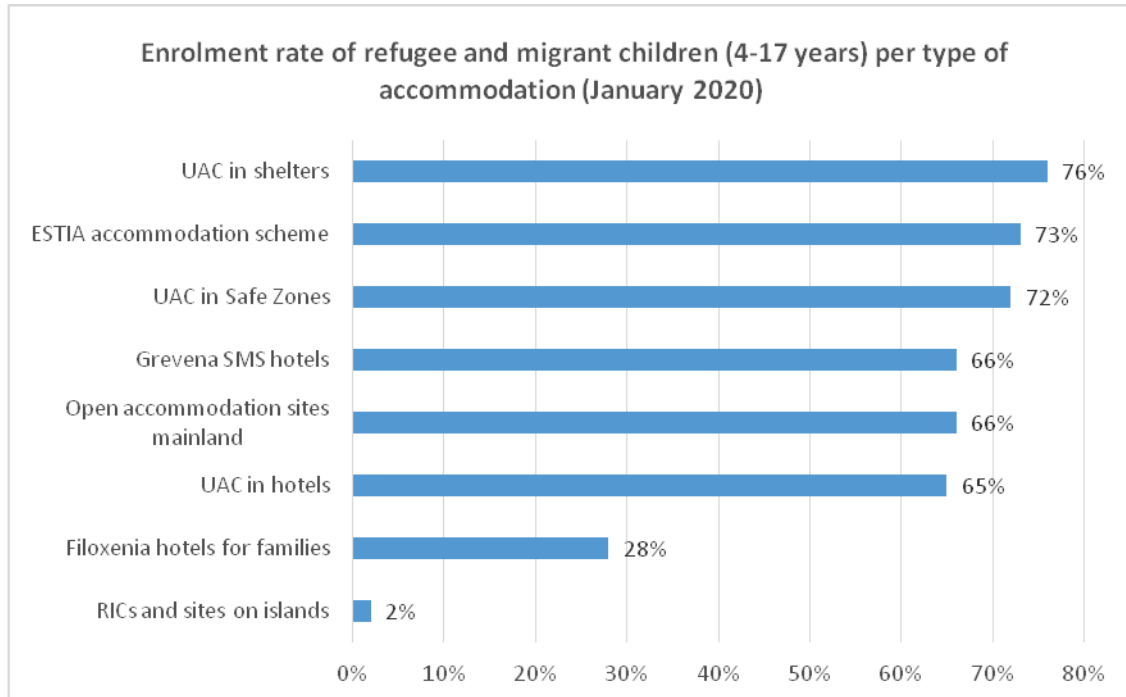
The realization of the right to education for refugee and migrant children is partly met. Data for the school year 2019-2020 (January 2020) provided by UNICEF Greece and Education Sector Working Group in Greece confirm that the vast majority of refugee and migrant children³⁹⁵ aged 4 to 17 years were out of school. In particular, only 13,000 children were enrolled which is 42% of the total number of school aged 4 to 17 years refugee children present in Greece (estimated approximately 31,000 children)

Enrolment rates were higher on the mainland (with a 61% enrolment rate), where access to public schools is easier compared to the islands (Regions of Crete, North Aegean and South Aegean) where enrolment rate was reportedly only 6%. The type of accommodation seemed to affect the enrolment rate given that children who were residing in urban accommodation (apartments, shelters and hotels for UAC) had higher rates of enrolment at 73% while children residing in RICs and accommodation sites on islands had the lowest rate of enrolment at 2%.

³⁹⁴ Marini, F. (2020): 'Migrants' Access to Social Protection in Greece', in J. Lafleur and D. Vintila (eds.), Migration and Social Protection in Europe and Beyond, Vol. 1, pp. 195-209, IMISCOE Research Series, Springer, Bonn, https://doi.org/10.1007/978-3-030-51241-5_13

³⁹⁵ For the scope of this assessment, refugee and migrant children represents third-country children who were accommodated in first and second line reception facilities across Greece.

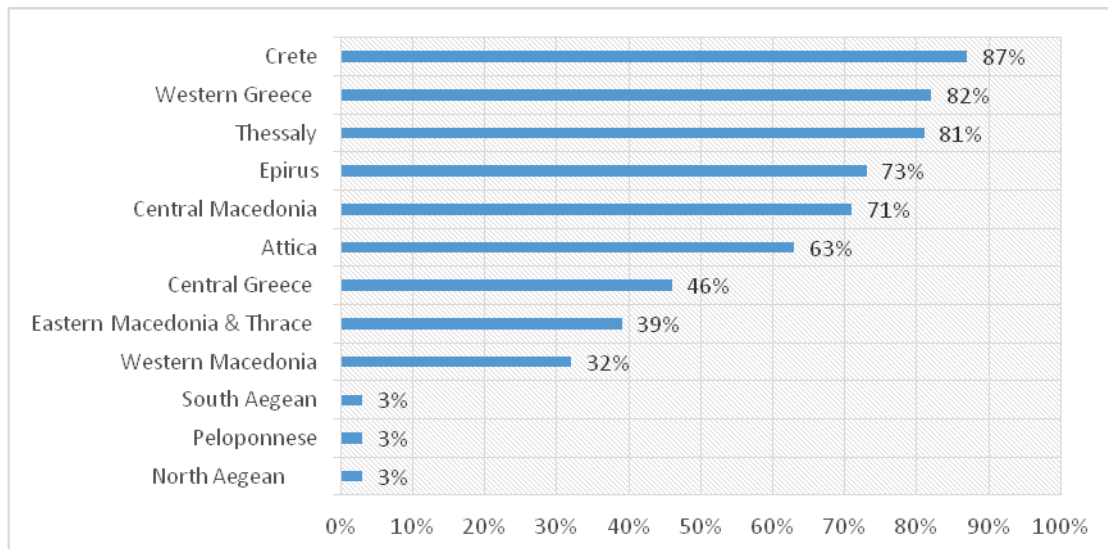
Figure 4 Enrolment rate of refugee and migrant children (4-17 years) per type of accommodation (2020)



Source: UNICEF and Greece Education Sector Working Group, Access to formal education for refugee and migrant children in Greece, January 2020.

Regional disparities in the enrolment rates were significant and can be attributed to various factors, among which the type of accommodation.

Figure 5 Enrolment rates in formal education of refugee and migrant children (4-17 years) per Region (January 2020)

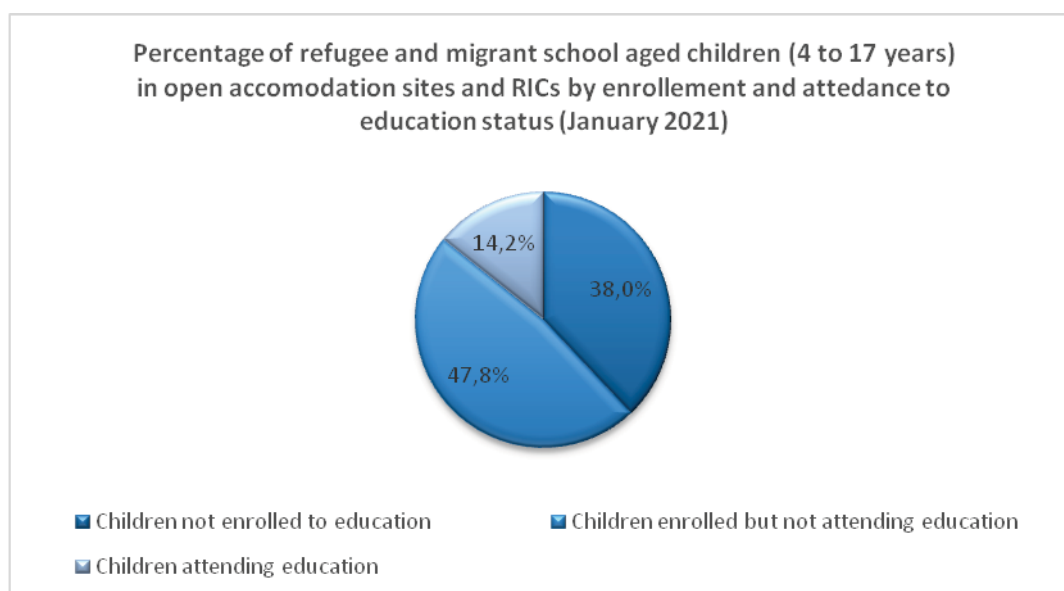


Source: UNICEF and Greece Education Sector Working Group, Access to formal education for refugee and migrant children in Greece, January 2020

In early 2021, another assessment by the Greek Ombudsman showed that the percentage of the total number of children (10,431) residing in 36 facilities (6 RICs and 30 accommodation sites in the mainland) enrolled to education was 62% (6,472 children).³⁹⁶

In areas with higher needs (increased population of school aged children), several challenges were met around a. the allocation of children in nearby schools, due to the lack of empty places and adequate teaching staff or space for the creation of additional classes, and b. the resistance from schools or local communities on the massive integration of non-Greek children in schools. In Reception and Identification Centers, almost the entire school aged population (91.5% - 1,912 out of 2,090 school aged children) has not been enrolled to education and from the small percentage of children enrolled, only a few attended (7 out of 178 children).

Figure 6 Percentage of refugee and migrant school aged children (4 to 17 years) in open accommodation sites and RICs by enrolment and attendance to education status (2021)



Source: Calculation of data from Greek Ombudsman (2021), Educational integration of children residing in facilities and RICs of the Ministry of Migration and Asylum, p. 12.

Another important issue that needs to be highlighted, is the attendance to education for the enrolled children; only 14.2% (1,483) of the total population of children was attending which in reality is much lower due to the increased school dropout caused by disfunctions of the system.³⁹⁷

Apart from school dropout, the main reasons for the lack of access were attributed to a combination of factors, such as:

³⁹⁶ Greek Ombudsman (2021), Educational integration of children residing in facilities and RICs of the Ministry of Migration and Asylum, p. 8.

³⁹⁷ Such important reasons are identified: the lack of teachers in reception classes, challenging transportation to schools, the lack of or the inadequacy of digital devices to attend distance education as part of COVID-19 restrictions, the negative stance of the local host populations and of the refugee families themselves.

- The delayed operation of DYEP classes in primary and secondary education as in most cases, they were not operational as of January 2021 due to the delayed deployment of teaching staff and/ or the unavailability of adequate classrooms in schools. This has been the case for all accommodation facilities and RICs, resulting in pupils attending the respective classes, losing half of the teaching year. In addition, the operation of the kindergartens within accommodation facilities had been challenging due to their occupation, vandalization or use for another purposes.
- The lack of or the inadequate or delayed deployment of teaching staff in Reception Classes in schools close to all accommodation facilities and RICs.
- Segregation of refugee and migrant children within schools in the framework of DYEP classes and within accommodation facilities as they were previously used exclusively for kindergartens use.
- The lack of or delayed start of transportation to schools (out of the 33 accommodation facilities assessed only in 8 facilities benefited from transportation services, 21 did not while 4 had no data to this effect). In most cases, the bureaucratic procedures for the transportation services have not been finalized by the competent Regional authorities. In case school transportation was available, no bus escorts were present. There have also been cases of children enrolled to different schools closer to the facility they stay, who were not eligible for school transportation and had to cover their own transportation costs.
- Despite relevant institutional provisions, the delayed vaccination and issuance of the medical booklet required for school enrollment could also be a barrier for school enrollment.
- The restriction of movement outside the facility as a result of a specific interpretation of the relevant Ministerial Decisions in the context of COVID-19 measures which did not seem to take into account school attendance (in 13 of the 26 facilities that there are evidence on that respect, children were deprived of physical attendance to education due to a relevant interpretation of the Ministerial Decision).³⁹⁸
- Lack of access to distance digital education during the period schools were closed due to COVID-19 restrictions due to the lack of digital devices. Out of the 30 facilities participating in the questionnaire, 27 stated that distance education did not operate efficiently or operated in a fragmented way.

5.2.2 Roma children

The Greek state's integration policy on Roma education started in the second half of the 1980s with the actions of the General Secretariat for Popular Education and intensified throughout the 1990s.³⁹⁹ Specifically, since 1987 the General Secretariat for Popular Education (in 2001 renamed in General Secretariat for Adult Education) designed and undertook a series of actions aimed at the encouragement and support of the participation of Roma children in school – including the development of

³⁹⁸ Greek Ombudsman (2021), *Educational integration of children residing in facilities and RICs of the Ministry of Migration and Asylum*, p. 8-22.

³⁹⁹ Dimitrakopoulos, I. (2004) Analytical Report on Education: National Focal Point for Greece, ANTIGONE - Information and Documentation Centre, Athens. Accessed in https://fra.europa.eu/sites/default/files/fra_uploads/285-R4-EDU-EL.pdf on 03-04-2021.

pedagogical material, training of educators, Roma adult literacy and vocational training programmes and awareness-raising activities geared towards combating stereotypes and discrimination against Roma.

In the second half of the 1990s, Law 2413/96 reiterated the state's commitment towards an intercultural educational orientation.⁴⁰⁰ In this framework, during the last twenty five years the Ministry of Education has issued a series of regulations concerning the registration of Roma children at school and their regular attendance; i.e. the allocation of the responsibility for tracking down, encouraging and facilitating the registration in and regular attendance at school of those Roma children who live in the vicinity of the school for which they are responsible, the facilitation of the registration of Roma children in pre-primary and primary school (even if not registered in municipal or civil registries or do not possess relevant documentation), reception and support classes provision, student card provision which enables on-the-move students to attend classes in different schools, the launch of zones of educational priority (ZEPs) etc.⁴⁰¹

In parallel, in 1997 Greece implemented a large-scale research programme on the education of Roma children.⁴⁰² The programme aimed at demographic data generation and documentation of the problems Roma children face in accessing and attending school, strengthening early childhood education and the transition from preschool to primary education, developing curricula and pedagogical material for Roma pupils, implementing interventions in selected schools, teachers' training, and support actions for parents etc. Nevertheless, severe disruptions in program implementation and multiple administrative changes have resulted in limited and fragmented outcomes,⁴⁰³ i.e. the relevant pedagogical material not systematically used in schools with Roma pupils, or educators' training not mainstreamed in such schools.⁴⁰⁴

⁴⁰⁰ Law 2413/96, entitled Greek Education Abroad, Intercultural Education and Other Provisions.

⁴⁰¹ Presidential Decree 200/1998 and Presidential Decree 201/1998, Ministerial Decree No.4/155/Γ1/1237/11-9-1996 (Government Gazette 893, B'), Ministerial Decree and Circular No.116184/Γ1/10-9-2008 of the Ministry of Education and Life-long Learning, Circular No.3/960/102679/Γ1/20-08-2010 and No.6/451/115136/Γ1/16-9-2010 of the Ministry of Education and Religious Affairs.

⁴⁰² Between 1997 and 2004, the programme, initially titled "Education of Gypsy children" (1997-2001) and later renamed "Integration of Gypsy Children in School" (2001-2004), was coordinated by the University of Ioannina. Between 2006 and 2008, the programme run under the title "Integration of Gypsy Children in School" and was coordinated by the University of Thessaly. From 2010 until 2013, the programme was renamed as "Education of Roma Children" and was coordinated by the National and Kapodistrian University of Athens along with the Aristotle University of Thessaloniki. Between 2016 and 2018 the programme "Inclusion and education of Roma children" was implemented by three Universities; the National and Kapodistrian University of Athens which is the main beneficiary, Aristotle University of Thessaloniki, and the University of Thessaly.

⁴⁰³ Georgiadis, F. (2012) Teacher Training in Roma education in Greece: Intercultural and Critical Educational Necessities. *Issues in Educational Research*. Accessed in https://www.researchgate.net/publication/277043537_Teacher_training_in_Roma_education_in_Greece_Intercultural_and_critical_educational_necessities/link/57fd183b08aeea8c97c86b28/download on 03-11-2021.

Mitakidou, S. (2013) Cross-Cultural Education in Greece: History and Prospects. In (eds) Carl A. Grant and Agostino Portera *Intercultural and Multicultural Education Enhancing Global Interconnectedness*. Routledge.

⁴⁰⁴ Dimitrakopoulos, I. (2004) Analytical Report on Education: National Focal Point for Greece, ANTIGONE – Information and Documentation Centre, Athens. Accessed in https://fra.europa.eu/sites/default/files/fra_uploads/285-R4-EDU-EL.pdf on 3-11-2021.

Whilst a notable increase in numbers of enrolment of Roma children particularly in primary education has been documented since, the gap between the number of enrolments of Roma children in primary school and their actual integration into mainstream education remains persistently wide.⁴⁰⁵

findings from the 2016 EU-MIDIS II 39 Survey provide a relevant snapshot for the situation in 2016 concerning the participation of Roma children in ECE. Table 12 shows that less than 1/3 of the Roma children between the age of four and the compulsory education starting age participated in ECE in Greece.

Table 11 Children aged between 4 years and the starting age of compulsory education who participate in early childhood education - Greece (2016)

Roma	Total population
Boys: 29%	84%
Girls: 27%	

Source: FRA, Second European Union Minorities and Discrimination Survey (EU-MIDIS II) Roma, 2016.

During school year 2015-2016 only 28% of Roma children aged between 4 years and the starting age of compulsory education (at 5 years at that time in Greece) were enrolled to early childhood education (table 11). In the same period, the net⁴⁰⁶ enrolment rate to compulsory education for Roma children aged 7 to 14 years was 69% while the respective rate for girls (66%) was lower compared to boys (72%).⁴⁰⁷

Despite progress so far, crucial challenges remain with regard to a. equitable access to inclusive quality and mainstream education for Roma children at all levels of education and b. completion of compulsory education. Clearly, more effective measures are needed to ensure Roma children access to and attendance in pre-school, upper-secondary and tertiary education. Educational inclusion of Roma children in Greece presupposes addressing social perceptions and attitudes that prevent equitable and inclusive approaches.

According to the results of the Second European Union Minorities and Discrimination Survey (EU-MIDIS II), almost half (48%) of Roma children of age between 6 and 15 attend classes in schools in which either all pupils or most of them are Roma.⁴⁰⁸ Although by law,⁴⁰⁹ discrimination, segregation and marginalization of Roma pupils is

⁴⁰⁵ Strategies and Tactics to Combat Segregation of Roma Children in Schools Case studies from Romania, Croatia, Hungary, Czech Republic, Bulgaria, and Greece. (2015) FXB Center for Health and Human Rights. Harvard University. Accessed in <https://cdn1.sph.harvard.edu/wp-content/uploads/sites/2464/2020/01/Roma-Segregation-full-final.pdf> on 3-11-2021.

⁴⁰⁶ Net enrolment rate: share of children of the respective age attending education level that corresponds to their age out of the total number of children of that age.

⁴⁰⁷ Second European Union Minorities and Discrimination Survey Roma – Selected findings, FRA (2016). Accessed in <https://fra.europa.eu/en/publication/2016/second-european-union-minorities-and-discrimination-survey-roma-selected-findings>, p. 27-31.

⁴⁰⁸ Second European Union Minorities and Discrimination Survey Roma – Selected findings, FRA (2016). Accessed in <https://fra.europa.eu/en/publication/2016/second-european-union-minorities-and-discrimination-survey-roma-selected-findings> on 3-11-2021.

⁴⁰⁹ Law No. 3304/2005 – G.G. 16/A (27/01/2005) on application of the principle for equal treatment irrespective of racial or ethnic origin, religion or belief, disability, age or sexual orientation.

forbidden, the separation of Roma and non-Roma pupils into different classes and Roma ghetto schools near Roma settlements and densely populated areas by Roma is a common practice.⁴¹⁰ In fact, Greece has been sentenced by the European Court for Human Rights (ECtHR) twice for restricting Roma pupils to segregated schools. This practice is often initiated or tolerated by teachers and school directors, non Roma pupils and their parents, the general population and local authorities.⁴¹¹

Qualitative data from fieldwork-based research demonstrate relevant cases; i.e. the school administration discouraging the registration of Roma children to school by demanding an overwhelming number of documents and medical certificates, municipal authorities banning Roma parents from participating in the school's board of parents, teachers and Roma parents initiating campaigns against the presence of Roma children in school and supporting, along with municipal authorities, the operation of a separate school for Roma children.⁴¹²

Discrimination, segregation and non-inclusive school systems systematically deprive Roma children of their right to education.⁴¹³ Simultaneously, poor school attendance is symptomatic of age and gender-based, communitarian-like relationships and practices which are principally located within marriage, work and the kinship network.⁴¹⁴ Often for Roma children, boys and girls, the necessity for early contribution to family income and household work constrain access or regular attendance to school and result in poor school performance. For adolescent girls and boys, early contribution to family income, marriage and childbirth often signals the end of schooling, meaning more limited opportunities throughout their adult life. However, poor educational attainment, early marriage and childbirth coupled with deprived housing conditions, lack of basic facilities and lack of financial resources have a disproportional impact on Roma young girls and women compared to young boys and men.

5.2.3. Children with disabilities and Special Education Needs

Starting from pre-school education (ECE), children enrolled in public special ECE schools face extremely strong problems to participate, particularly linked to:

- i. limited accessibility to school units due to transportation problems,
- ii. limited availability of qualified teachers and other professionals (psychologists, speech therapists, rehabilitators, social workers or teaching assistants),

⁴¹⁰ Strategies and Tactics to Combat Segregation of Roma Children in Schools Case studies from Romania, Croatia, Hungary, Czech Republic, Bulgaria, and Greece. (2015) FXB Center for Health and Human Rights. Harvard University. Accessed in <https://cdn1.sph.harvard.edu/wp-content/uploads/sites/2464/2020/01/Roma-Segregation-full-final.pdf> on 3-11-2021.

⁴¹¹ Strategies and Tactics to Combat Segregation of Roma Children in Schools Case studies from Romania, Croatia, Hungary, Czech Republic, Bulgaria, and Greece. (2015) FXB Center for Health and Human Rights. Harvard University. Accessed in <https://cdn1.sph.harvard.edu/wp-content/uploads/sites/2464/2020/01/Roma-Segregation-full-final.pdf> on 3-11-2021.

Daskalaki, I (2018). *Gypsies, Childhood and Education in Greece: An Anthropological Study*

⁴¹² See for example, the cases from the Prefectures of Achaia and Korinthia of the Peloponnese Region described in Kiprianos, P., Daskalaki, I. & Stamelos, G. (2013) "Culture and the School: The Degree of Educational Integration of Roma and Gypsies in the Peloponnese Region of Greece", *International Review of Education*, Volume 58, Issue 5

⁴¹³ https://fra.europa.eu/sites/default/files/fra_uploads/fra-2014-roma-survey-dif-education-1_en.pdf

⁴¹⁴ Daskalaki, I (2018). *Gypsies, Childhood and Education in Greece: An Anthropological Study*

- iii. lack of awareness campaigns,
- iv. iv. lack of tailor-made learning support to compensate for their linguistic, cognitive and educational gaps due to non-participation in ECC,
- v. lack of empowerment procedures for themselves and their families.

In addition, schooling settings often lack an adequate degree of accessibility in relation to physical environment and information and communication technologies, which includes teaching and non-teaching material and online systems used for education.⁴¹⁵ There is a general lack of teachers specialized in the provision of education for learners with disabilities and an overall low awareness among mainstream teachers of the diversified needs of children with disabilities and of the necessity to tackle them as much as possible within inclusive settings.⁴¹⁶

A relevant Report from the Greek Ombudsman⁴¹⁷ to the Ministers of Education and Infrastructure-Transport states that "*after an inspection of the competent services, many kindergartens are not suitable for housing infants either because an unsuitable building has been selected from the beginning, or because the required work, so that the space meets the needs of infants*".

However, in general there are similar persisting issues across all education levels. Several challenges were identified in relation to the implementation of the framework for special education in Greece, often resulting into lack of implementation of co-educational programs between special and general schools. Most are related to the "*organization, resources, staff, teaching programs and methods, educational material, perceptions and practices in the education of children with disabilities*"⁴¹⁸. In addition, significant delays in the recruitment of teachers providing special education and training in the beginning of the school year account for learning gaps and difficulties with further negative impacts on attendance of children.⁴¹⁹

Given the lack of official data from the Ministry of Education and Religious Affairs, the National Confederation of Persons with Disabilities (ESAMEA) using data from MoERA MySchool database, estimates that during school year 2019-2020 students with disabilities and/ or special educational needs with or without a formal medical opinion, attending general and special schools of primary and secondary education, **constitute 7% of the student population of the country and amount to 101,683 students** (89,597 pupils with disabilities and/ or special educational needs attended general primary and secondary education schools while 12,086 students attended special education schools). 68% of students with disabilities and/ or special educational needs are boys. 5.5% of students with disabilities attend general and special kindergartens, 44.6% primary schools of general and special education while

⁴¹⁵ Greek Ombudsman (2019), Parallel Report on the Implementation of the UN Convention on the Rights of the Child (Greece), p. 35.

⁴¹⁶ National Confederation of People with Disabilities - ESAMEA (2021), Research Brief about inclusive education, Athens.

⁴¹⁷ Greek Ombudsman (2021), Building conditions and technical specifications of public kindergartens, 5 April 2021.

⁴¹⁸ Greek Ombudsman (2019), Parallel Report on the implementation of UNCRC (Greece), 1 November 2019, p. 35.

⁴¹⁹ Op. cit., p.36.

the largest part of these students, 49.9%, attend lower and upper secondary education schools (general, special, vocational).⁴²⁰

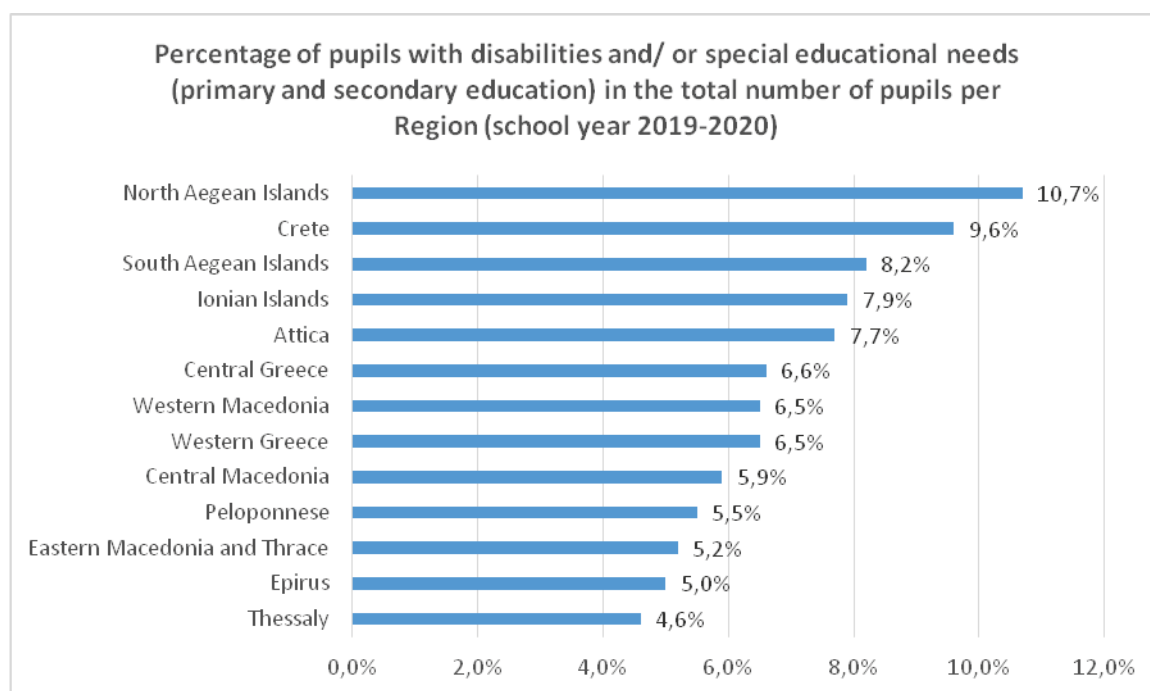
Table 12 Students with disabilities and/ or special educational needs (school year 2019-2020)

Type of school	Number of students	%
Kindergartens	5.570	5,5%
Primary education schools	45.362	44,6%
lower and upper secondary education schools	50.751	49,9%
Total	101.683	

Source: National Confederation of Persons with Disabilities (ESAmE) Disability Observatory (2021), 10th statistical information sheet “information for the education of students with disabilities and/or special educational needs”

There are also regional disparities present in the rates of pupils with disabilities and/ or special educational needs, with the Regions of North Aegean (10,7%), Crete (9,6%), South Aegean (8,2%) having the higher percentages in relation to the total number of pupil population.

Figure 7 Percentage of pupils with disabilities and/ or special education needs in the total number of pupils per Region (school year 2019-2020)



Source: National Confederation of Persons with Disabilities (ESAmE) Disability Observatory (2021), 10th statistical information sheet “information for the education of students with disabilities and/or special educational needs”, p. 16.

⁴²⁰ National Confederation of Persons with Disabilities (ESAmE) Disability Observatory (2021), 10th statistical information sheet “information for the education of students with disabilities and/or special educational needs”, p. 12-15.

However, regional differences require further research to attain whether differences in students' access relate to the assessment-certification system (regional operation and adequacy issues of KEDASY) and supporting services or to the local particularities related to the perceptions for disability and special education needs.⁴²¹

Physical access for persons with mobility issues is a fundamental dimension of access to the education system. Based on an assessment by the Ministry of Education in 2019, 7,361 schools did not have a ramp for wheelchairs and more 9,917 do not have toilets for persons with disabilities.⁴²² For this reason, a funding of 35 mil. Euros was ensured to construct ramps and toilets in schools. Additionally, the National Confederation of Persons with Disabilities identifies a *“problematic and incomplete school transportation system for children with disabilities resulting into exclusion from the education procedure”*.⁴²³

The number of children not accessing education or dropping out is not known as no relevant data exist.⁴²⁴ UN Committee on the Rights of the Child and the UN Committee on the Rights of Persons with Disabilities expressed several times their concerns regarding the lack of statistics on children who may be considered as belonging to vulnerable groups, including children with disabilities. Special attention should be also placed in ensuring that constructions and acquisitions do not do more harm by creating new barriers. Accessibility assessments can help ascertain existing barriers and factoring the findings into the planning, design and implementation of educational facilities' upgrades and constructions. In the same vein, to ensure that all new acquisitions are barrier-free, accessibility considerations must be factored into all relevant procurement activities.

In the field of **special education**, underfunding and subsequent lack of resources has been identified as a main concern in terms of unmet needs. Contrary to general education, special education mostly relies on non-permanent staff (alternate teachers) funded by Partnership Agreement for the Development Framework (ESPA).⁴²⁵ Additionally, a number of problems are persisting in the field of special education, such as:

- the inadequate parallel support “due to reduced working time and non-specialization of the staff, as well as failure to cover all the special educational needs of students with special education needs in integration classes”,
- “absence of special and personalized education programs, materials, equipment and intervention programmes (occupational therapy, psychotherapy, speech therapy),
- lack of implementation of co-education programs between general and special schools,
- lack of interconnection of schools with community services”.⁴²⁶

⁴²¹ Op.cit., p. 15.

⁴²² Ministry of Education and Religious Affairs (2019), Funding of 55 million euros for fire protection measures and 35 million euros for ramps and toilets for the disabled in schools announced by the Ministry of Interior.

⁴²³ National Confederation of Persons with Disabilities (ESAmE) Disability Observatory (2021), Annual Report 2020, p. 68

⁴²⁴ Op.cit., p. 66.

⁴²⁵ Greek Ombudsman, 2015, [Problems in the implementation of the right to education for children with disabilities or/and special education needs](#), p. 2-3.

⁴²⁶ Greek Ombudsman, “Parallel Report on the Implementation of the UN Convention on the Rights of the Child”, November 2019, p. 35-36.

Arguably, a recent positive development has been the appointment of 1,817 teachers of various specialties in primary special education and 1,628 in secondary special education in 2020.⁴²⁷

5.2.4. Children residing in institutions

As of October 2020 1,689⁴²⁸ children are hosted in public (656) and private (1,033) institutions. Even though there are no quantitative data on the access of these children to education, a relevant report of the Greek Ombudsperson⁴²⁹ highlights that “a big percentage of children residing in institutions faces difficulties in school integration due to gaps in prior education, neglect and learning or emotional difficulties”. Only some of the institutions provide children additional education support which results into unequal educational opportunities. For this reason, children in institutions with increased difficulties and special education needs tend to attend special education schools in higher percentages given that presence of educational support that would facilitate their general education schools attendance.

⁴²⁷ Ministry of Education Religious Affairs, For first time permanent appointments in Primary and Secondary Special Education schools, 05-08-2020.

⁴²⁸ UNICEF (2021), A situation analysis of children and youth. In this number there are 18 persons over 18 years included.

⁴²⁹ Greek Ombudsperson (2020), From residential to community care - Alternative care for vulnerable children and families support, Special Report, p. 38-39.

C. Key Conclusions

- **Vulnerable children** (particularly Roma children, children with refugee background, children with disabilities or special education needs, children in institutions) **face significant challenges in accessing education.** Costs, coupled with administrative barriers with regard to registration, present significant challenges for many families, compromising their child’s legal and universal right to a free-of-charge, publicly financed education.
- **Non-effective school transportation impairing school attendance.** Even though comprehensive data on transportation costs remain limited, research suggests that even in a high income country like Greece, transportation is a significant factor for those children not being able to access school within a reasonable distance from their home. Based on Greek Ombudsman,⁴³⁰ school transportation of pupils to schools is problematic in many areas, especially in rural areas. Many challenges that persist, are relevant to: *a. “insufficiency of transportation means, b. the area is geographically remoted and inaccessible, c. organization in the regional level through public tenders which are time consuming and do not take into account specificities of small rural areas or other restrictions, d. the reimbursement of parents is less than the actual amount expended and is significantly delayed.”*
- **Disability** is another significant factor preventing children from accessing education, due to lack of accessible material and/or difficulties with transportation to school. With constant new advances in technology, there are more ways than ever to make education available to those children with disabilities and ensure equitable access to all.
- **Lack of comprehensive disaggregated data on children out of or dropping out education** and the absence of a central monitoring system on access to education, prohibits comprehensive assessment allowing policy makers to prioritize funding and policies to the necessary directions.

⁴³⁰ Greek Ombudsman (2019), Parallel Report on the implementation of UNCRC (Greece), 1 November 2019, p. 34.