

Hello,

Regarding your email about the investigation into the conditions in the Safe Areas, we would like to make the following remarks:

Foremost, it seems that there is not a clear understanding on your behalf of the situation and the roles of each stakeholder within the Safe Areas. As a result, you address questions to ZEUXIS for issues that are not the responsibility of the NGO, they actually fall into the mandate of other entities.

So, please allow us to clarify a few things before replying to your questions.

**Closed Controlled Access Center (CCAC):**

It is a State facility appertained to the Ministry of Migration and Asylum (MOA).

The CCACs host the Safe Areas, which are designated areas for Unaccompanied Migrant Children who enter Greece without legal documents.

The CCACs are managed by a Director - all CCACs Directors report to the Governor of Reception and Identification Service (RIS). They are all supervised by the Secretary General of Reception and Identification.

The operation of the CCACs and the Safe Areas is regulated by Laws, Ministerial Decisions, Joint Ministerial Decisions and Circulars.

All the provisions, regulations, procedures, policies etc. related to the operation of the CCACs are accessible and included in the legal texts mentioned above.

**ZEUXIS NGO is a non-governmental organisation.** Therefore, ZEUXIS:

1. Does NOT decide who has access to the Safe Areas (S.A.). Even ZEUXIS' staff from the Headquarters in Athens, before visiting the Safe Area of a Closed Controlled Access Center (CCAC), need to apply for Permission of Entry to the Reception and Identification Service (RIS), which, as mentioned above, is the Public Authority

responsible for the operation of the CCACs (and the Safe Areas). Therefore, ZEUXIS does not have either the power or the authority to decide who has access to the S.A.

2. Does not decide who exits the S.A. ZEUXIS cannot escort UAMs outside of the S.A. without permission by the legal guardian, the public prosecutor or the director of the CCAC.
3. Does not manage the S.A. You mention several times in your email that ZEUXIS manages the S.A. This is not accurate, since the S.A. is managed by the Director of the CCAC.
4. Does NOT supervise the S.A. On the contrary, ZEUXIS is supervised by the authorities.
5. Does NOT control the number of Unaccompanied Minors (UAMs) who are hosted in the S.A. ZEUXIS receives UAMs as they are transferred to the S.A. by the authorities.
6. Is not responsible for the maintenance of the S.A., the infrastructure or the appliances.
7. Is not responsible for the cleaning or the collection of garbage in the S.A. There is a company contracted to deliver these services.
8. ZEUXIS employs staff present in the S.A. 7 days per week, 24 hours per day. The claims that ZEUXIS staff was not present in the S.A. are not accurate and we reject them. The presence of our staff can be very easily verified:
  - a) By the work programmes we submit to the Labour Inspectorate, the State authority that supervises our operation and our abidance by Labour Law,
  - b) By the entry and exit logbooks kept at the entrance of the CCAC where our staff signs every time they enter and exit the CCAC. The procedure includes a timestamp,
  - c) The salaries we pay which include increments for working during night shift, on Sundays, holidays etc.,
  - d) the logs of the Hellenic Police and the local hospital where our staff escorts UAMs 24/7, and
  - e) The Closed-Circuit TV system of the CCAC.
9. ZEUXIS reports to the Authorities whenever it receives reports about police misbehavior. Of course, it does the same whenever such behavior takes place and ZEUXIS staff witness it themselves.

10. ZEUXIS' point of view is that the Police should follow the law whenever it operates and should not abuse its power.
11. Does **NOT** decide which UAMs leave the S.A., or when they leave, or with which criteria they are prioritised or where they go. This is exclusively the responsibility of the MOA.
12. Is **NOT** involved in the verification of "Power of Attorney" or anything similar. This is a State Competence exercised by the State and not an NGO. Any challenges faced by lawyers wanting to get access to their clients or "deliberate administrative hurdles" should be discussed with the State Authorities that supposedly cause them.
13. Does **NOT** detain UAMs or anybody else. Being an NGO, ZEUXIS is in no position and has no power over detaining any person.
14. Cannot influence entry and exit regulations. These are regulated by the competent State Authorities that operate the CCAC, following the legal provisions mentioned above.
15. Is **NOT** responsible for the provision of medical services in the S.A. ZEUXIS only facilitates access of UAMs to health facilities (i.e. hospitals, doctors, medical centres etc.). In some cases, it pays for private doctors and examinations, as well as for medicine. Medical problems faced by UAMs are the responsibility of the National Health System and the programme called "IPPOKRATIS", implemented in cooperation with the MOA.
16. It accepts donations and support. Whenever such an offer occurs, it is usually done in writing. ZEUXIS does not rely on donations to support its operation. It has budget lines for items such as clothes, shoes etc. Donations can supplement the activities in some cases, but this is not the rule.

In addition, you mention that from one point onwards ZEUXIS stopped accepting help and donations.

At this point, it is worth mentioning additional information that proves the information you have wrong:

- Earlier this year, it came to our attention that MSF (Geneva Branch) expressed their intention to help in the S.A. ZEUXIS Director, called Ms. Sonia Balleron, Head of Mission Greece and Bulgaria MSF and arranged a meeting with her. During the meeting, our Director expressed ZEUXIS' gratitude for the

help offer and confirmed that ZEUXIS would welcome MSF's help in the S.A. of Samos. At the same time, it was clarified that ZEUXIS cannot grant access to MSF, as this is the competency of the RIS.

We believe that this demonstrates ZEUXIS attitude towards receiving help. If you wish to contact MSF, that is OK with us.

- Moreover, ZEUXIS received three (3) donations for the S.A. from private entities. One (1) in kind and two (2) in money. For all three (3) donations, there are receipts and documents. The donations were used to support the operation of the S.A. in Samos. Once again, as you see, we have not turned down offers.

Regarding offers for legal help: the NGOs in Samos active offering legal support about family reunification (Dublin procedure) and/ or asylum procedures probably are not aware of the law provisions.

According to Law 4960/2022<sup>1</sup>, the legal guardian represents the UAMs in all legal procedures namely family reunification (Dublin procedure) and - or asylum procedures. **Any legal action on behalf of the UAM including the UAMs' representation by a lawyer must take place by the legal guardian.** The legal guardian and only the legal guardian is responsible and has the power to represent the UAMs. Moreover, the Joint Ministerial Decision 187634/2023<sup>2</sup> affirms that without the presence (or the power of attorney signed by the legal guardian), nobody else is in position to represent the UAM in any asylum procedure (family reunification included).

**ZEUXIS is not the legal guardian of the UAMs.** There are two NGOs in Greece, METADRASI and PRAKSIS that act as legal guardians of the UAMs. Therefore, these two NGOs are the ones to be contacted by anyone who requires more information about these issues and not ZEUXIS. ZEUXIS cannot refer UAMs to any third party to be legally represented.

As you ask us about our actions regarding the appointment of legal guardians, we believe that it is clear that we have neither any involvement

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<sup>1</sup> Government Gazette A' 145/22.07.2022

<sup>2</sup>Government Gazette B' 2125/31.03.2023

nor any responsibility about this. It is the public prosecutors that appoint legal guardians.

We hope that these answers clarify the situation and facilitate your investigation. We remain at your disposal.

ZEUXIS