

Generation 2.0 for Rights, Equality & Diversity

Report on the Citizenship Directorates of the Ministry of Interior

July 2020

Table of contents

Brief presentation of Generation 2.0 for Rights, Equality & Diversity	3
Introduction	5
I.Recording of issues	6
Delays in the application processing	7
Understaffing of services	7
Establishment of Naturalization Committees	9
Delay in the implementation of the legislative framework	10
Applicants' information issues and statistics	10
Requests for speeding up the procedure	11
Archiving issues	11
Errors in birth certificates	12
II. Good practices of Citizenship Directorates	12
III. The situation as a result of the appearance of coronavirus (Covid-19)	13
IV. Generation 2.0 RED's recommendations	14
V. Epilogue	15
ANNEX	17

Brief presentation of Generation 2.0 for Rights, Equality & Diversity

Generation 2.0 for Rights, Equality & Diversity (Generation 2.0 RED) started as an initiative of a group of young people with immigrant backgrounds in 2006. Then, working as an informal group known as the "Second Generation", our primary goal was to secure the right to citizenship of the invisible generation of immigrant children born and/or raised in Greece. Today, Generation 2.0 RED is a Non – Profit Organization consisting of people with different origins who work together to promote equal participation in a diverse society, through the empowerment of communities. The mission of Generation 2.0 RED, is implemented through a holistic approach, intervening at the individual, social and institutional level, by action and research, aiming to promote human rights, equality and diversity, fight racism, xenophobia and discrimination in general.

Since 2008, our foundation year, we have completed campaigns that led to the right of Greek citizenship for the second generation, we have created integration services for free and we have organized our own events that promote human rights as well. We participate and cooperate with the largest human rights networks in Greece and Europe, claiming the rights of socially vulnerable groups, regardless of their origin, nationality, religion, gender or sexual orientation.

WHAT WE DO

Advocacy

As an organization which emerged from a campaign, advocacy plays an integral role across all our activities. G2RED advocates to shape the public discourse for equal participation and inclusion in a diverse society. The main thematic priorities are migration and citizenship, equal treatment, and equal access to social and labor rights. Our advocacy work includes various activities, some of which are awareness raising campaigns, informative sessions, institutional mediation, the Observatory on Citizenship, ASET, interventions in cases of violations of rights and administrative failures and various publications.

Legal Counselling & Intercultural Mediation

Service for migrants, refugees and second-generation youth, regarding their documentation in Greece. Through individual sessions, beneficiaries are informed on their rights and their eligibility to apply for a residence permit or citizenship.

Career Counselling

Service for migrants, refugees, asylum seekers and second-generation youth. Through a structured, multi-faceted program including individual counselling sessions, skills development groups and seminars/workshops, beneficiaries are guided to navigate successfully into the Greek labor market and are empowered in order to restart their career in Greece. The program of the Career Counselling goes in hand with the "Diversity in the Workplace" Network, consisting of

private sector companies and organizations supporting diversity and offering multiple opportunities, such as hard-skills training to people completing the Career Counselling program.

Non-Formal Education

Greek Language classes for those who want to improve their everyday communication and for those wishing to take the Certification of Attainment in Greek, preparation classes for the Naturalization Interview with 100% success, addressed to adults using adequate tutoring methods and tools. At the same time, educational programs and tools are implemented that promote human rights and respect for diversity, with the floor board game "Diversity Volcano".

ASET

At the initiative of G2RED, the Representative Council for Research and Documentation (ASET) is being set up to respond to today's challenges in the area of migration. Specialized on rights-based advocacy, ASET intends first to highlight the problems and secondly through study, research and documentation to intervene accordingly towards the best possible solution. The council is made up of representatives of immigrant communities operating in Greece with years of experience and engagement in socio-political activities. Other members also include researchers and experts with experience and expertise on migration as well as in the area of advocacy and rights protection.

Manolada Watch

An initiative of Generation 2.0 RED for the monitoring of working and living conditions of the migrant agricultural workers at Manolada in Ilia, Greece. Since 2017 through the program "Enhancing access to justice for migrant land workers" with the aim of empowering migrant land workers in the area of Manolada for their more substantial access to basic legal services, we have collected a lot of data and relevant experience. We decided to share the experience with the public in order to contribute to the awareness of the Greek society and the public authorities for the case of Manolada.

Introduction

As an organization we have been actively monitoring the citizenship issues since 2006: the enactment of Law 3838/2010, the social injustice caused by decision 460 of the Council of State that deemed unconstitutional two of the innovations¹ brought by Law 3838/10, the enactment of Law 4332/2015 which finally granted the right to Greek citizenship to the children of immigrants born and / or raised in Greece. Since the legalization of citizenship, Generation 2.0 RED continues to monitor the implementation of the legislation. In this context, we are in regular contact with the Citizenship Directorates², recording the difficulties observed in the process of granting Greek citizenship for the second generation, as well as the naturalization of foreigners, which arise either from bureaucratic difficulties or from legislative gaps.

This report is an initiative of **Generation 2.0 for Rights, Equality & Diversity (Generation 2.0 RED)** which resulted from the discussions based on a common open questionnaire and the telephone contact with the heads of the Citizenship Directorates of the Ministry of Interior in the region of Attica (the Citizenship Directorate of Athens, the Citizenship Directorate of Central and Western Attica, the Citizenship Directorate of Northern and Eastern Attica and the Citizenship Directorate of Southern Attica, Piraeus and Islands), from November 2019 to July 2020, the information provided to us as well as the parable of our own experience in the field through the legal advice we daily provide on the procedures and conditions for acquiring citizenship. The result of monitoring and recording of the operation of Citizenship Directorates is the collection and presentation of information on the most important chronic issues they face. Our goal is to inform and raise awareness of all interested parties but specifically to inform the competent bodies.

The first chapter of the report presents specific administrative issues, such as staffing, application processing pace, setting up of naturalization committees, information of applicants, delays in issuance of the necessary ministerial decisions on a number of issues and lack of statistics. The second chapter outlines some good practices that Citizenship Directorates have implemented in order to improve the administrative malfunctions that have arisen. The third chapter briefly presents the situation as it arose as a result of the appearance of the coronavirus (Covid-19). In the fourth and last chapter, observations and recommendations are made to the Ministry of Interior on the issues reflected in this report, in order to improve the current situation in the Citizenship Directorates.

At the end of the report in a special annex, numerical data are presented that reflect the current pace of application processing and result from the information provided to us by the heads of Citizenship Directorates. In this way we wanted to fill, as much as possible, the information gap that has arisen, due to the non-updating of the statistic by the Directorate of Citizenship of the

¹ The first innovation was the right to vote and to be elected in local elections, for certain categories of legally residing third-country nationals, as well as for Co-Ethnic Greeks. A second innovation was the introduction of special procedures for acquiring Greek Citizenship for the children of immigrants (Second Generation), either from birth if their parents resided permanently and legally in the country for at least five consecutive years, or upon successful completion of attending at least six classes of Greek education.

² The Citizenship Directorates consist of the following departments: Citizenship Department, Naturalization Department and Registry

Ministry of Interior, regarding the system of granting Greek citizenship and the naturalization system.

I. Recording of issues

Citizenship issues fall within the competence of the Ministry of Interior. In 2017, the Special Citizenship Secretariat was established with the mission to plan and implement public policies on issues related to the acquisition and loss of Greek citizenship, which was upgraded to the General Secretariat of Citizenship in July 2019.

A series of administrative changes contributed to the current situation, the last of which came into effect in early 2019. Specifically, while until then the Citizenship Directorates were falling down under the auspice of the Decentralized Administrations, from January 1, 2019 they started to fall under the auspice of the Ministry of Interior as its regional services, under the Secretary General of Citizenship of the Ministry of Interior. This cost the loss of employees throughout the territory. It also created administrative problems such as the issue in the Male Registers, which continued to fall under the auspice of the Decentralized Administrations, thus creating an additional administrative procedure involving the transferal of the files of male applicants. The delays according to the announcement of the Federation of Workers Associations of the Decentralized Administrations of Greece, are attributed to two reasons. First, there has been no provision for the necessary interconnection of the internal information systems to proceed with the processing of applications. Secondly, following the transfer of staff to the Ministry of Interior, the Male Registers have remained understaffed, with the remaining employees having to deal with a tremendous workload since the applications of the naturalized are only a part of their responsibilities. According to the information provided to us, there are no pending issues regarding the registration of males in the registers for the period from 2019 to March 2020, however the necessary interconnection of the information system with the sections of the Male Registers has not been completed yet despite the relative efforts towards its resolve.

Taking into account the above issues, we will attempt to make a comprehensive presentation of the current situation in the Citizenship Directorates with reference to specific issues, such as staffing, the pace of application processing, the setting-up of naturalization committees, information of interested applicants, delays in issuance of necessary ministerial decisions on a number of issues and the lack of statistical data.

Delays in the application processing

Despite the existence of an adequate legal framework, there are still problems and the processing of requests proceeds amid long delays, both in the granting of citizenship for the **second generation** as well as in the process of **naturalization of foreigners**. The deadlines for the granting of Greek citizenship provided by the Greek Citizenship Code are not applied in practice. For the second generation, while the provided time frame is 6 months for minors and 1 year for adults, in some cases the waiting time for the issuance of the decision reaches 4 years from the application submission. Respectively, the time frames in the naturalization process as defined in article 31 of the Greek Citizenship Code (1 year) are not respected and the naturalization interviews according to the current data are conducted up to 5 years after the application submission. It is obvious that the above delays are disproportionate deviations from the time frames set by law and are a phenomenon of bad administration.

The extreme delays in several cases are attributed to the following reasons:

Understaffing of services

A key issue faced by the Citizenship Directorates is the understaffing of services, which we were aware of but also found out during our presence. The number of employees in some cases does not meet the needs of the Citizenship Directorates. In fact, during our last meeting with the Secretary General of Citizenship, Athanasios Balerbas, we were informed that he had already identified the issue after his own presence in the Citizenship Directorates. Due to the lack of sufficient staff, employees are required to handle a high volume of work that would normally have to be performed by more people. This significantly affects the smooth operation of the Citizenship Directorates and the pace of application processing which results in serious delays in the acquisition of citizenship through naturalization and the second generation process.

A typical example is the Citizenship Directorate of Athens, which operates with the smallest number of staff compared to the other Citizenship Directorates of Attica Region. During our last visit in November 2019, as we were informed by the head of the directorate, the Citizenship Department now operates with only three employees, while it operated with eight, the Naturalization Department with five and the Registry with three. In fact, in our last telephone conversation in February 2020, we were informed that another employee would leave from the Citizenship Department. In total, the entire Directorate consists of eleven employees in contrast to the other Citizenship Directorates of Attica which consist of eighteen employees.

The understaffing is also caused by the fact that employees choose by themselves to be transferred to another public service. This happens mainly because, in addition to the huge amount of work they have to manage, they also work in unsuitable working conditions, something we found out during our visit. We also noticed that there is an issue of space adequacy and the service files are stacked in the corridors.

Finally, regarding the cases of Citizenship Directorates that despite the rather high number of employees show a significant delay in the application processing, let us refer to the case of the Citizenship Directorate of Thessaloniki. Although it does not concern the Citizenship Directorates of Attica analysed in this report, it is worth to be mentioned, because it has preoccupied us a lot in the past. While according to the official data of the Ministry of Interior it seemed to be the most numerous in number of employees, in the processing of applications for second generation citizenship was far behind compared to other Citizenship Directorates with less staff and a higher number of applications. After a recent telephone conversation with the Head of the Directorate and after the necessary clarifications concerning the existing organization chart of the service, the employed staff who process the applications for second generation citizenship, are 4 employees of the Naturalization Department in a total of 27 employees of the Citizenship Directorate³.

³ According to the latest data provided to us regarding the examination of requests of the abovementioned category, at the given time the Citizenship Directorate examines applications of the first quarter of 2017.

> Establishment of Naturalization Committees

The responsibility of the naturalization committees is to conduct interviews so as to determine the contribution of the standard conditions for naturalization to the person that applies for Greek citizenship, such as sufficient knowledge of Greek language, smooth integration into economic and social life and active and effective participation in the political life of the country. Regarding their composition, they consist of the Head of the Citizenship Directorate, the Head of the Citizenship or Naturalization Department of the Citizenship Directorate, a university professor, a secondary education official and a human rights expert, while their term of office is two years. The naturalization committees must gather at least three members in each committee in order to be established. Otherwise they do not meet.

An issue that directly affects the naturalization process is the difficulty in the setting up of committees. According to the heads of the Citizenship Directorates, the problem is due to two reasons. Initially, it is due to the fact that the members of the committees, although their remuneration is provided by law⁴, are not remunerated due to the lack of a Ministerial Decision that will determine the remuneration, and thus they have no serious motivation to appear. Secondly, because they have other main professional obligations. In fact, the greatest difficulty of presence in the committees is observed in the lawyers, according to the head of the Southern Attica, Piraeus, and Islands.

Moreover, while in the interview process the Citizenship Directorates operate with two committees, committee A and committee B, in most cases we found out that the Citizenship Directorates operate with only one committee either because the other is unable to set up or the term of office of one of the two has expired by law, or they operate with two committees but the meetings of the one are not regular.

Specifically, the Citizenship Directorate of Athens operates with only one committee, as committee B stopped operating on November 15 by law because it was only for two years.

The Citizenship Directorate of Southern Attica, Piraeus and Islands operates with one committee, which meets twice a week and examines about 20 people per week and a total of 80 people per month.

In the Citizenship Directorate of Northern and Eastern Attica, there is a committee A chaired by the head of the directorate, which meets once and in some cases twice a week and examines up to 10 people per week, while committee B chaired by the head of the Immigration Directorate of Northern & Eastern Attica meets once a month and sometimes none.

-

⁴ According to Article 12 par. 5 of Law 3284/2004

Delay in the implementation of the legislative framework

An important issue highlighted by the heads of the Citizenship Directorates is the delay in the issuance of the necessary ministerial decisions after the enactment of the relevant law, for the specialization of its provisions and the regulation of individual issues. This creates a legal vacuum, which further delays the work of public administration.

Specifically, there are two cases in which the necessary ministerial decisions have not yet been issued:

Firstly, in the process of naturalization of foreigners, in addition to the delays observed in the application processing, the necessary reform regarding the conditions and the process of naturalization has not yet been completed. It has already been a year since the enactment of Law 4604/2019, which provides that the interview process in naturalization is abolished and replaced by a standard procedure (test) and at the same time various categories of certification of Greek language knowledge. However, the necessary Ministerial Decision that will define this new procedure has not yet been issued.

Secondly, the same law⁵ provides for the possibility of exemption from the determination of part or from all of the standard conditions in the naturalization process for people with a certified physical or mental disability of more than sixty-seven percent (67%), provided that they present a special medical opinion from a public body. Since the official Ministerial Decision to specify this procedure has not been issued so far, it is carried out with a solemn declaration of the interested applicant.

In addition to the delays of the Ministerial Decisions by Law 4604/2019, the changes of <u>Law</u> 4674/2020 have been added, which froze for six months the application of article 32 of Law 4604/2019, which had reformed the process of determining the standard conditions of naturalization, in order to come up with another provision in the future.

Applicants' information issues and statistics

Regarding the issue of reliable and timely information of citizens there have been noted various obstacles and difficulties. One of these is the fact that the call center and the website have not been renewed since the services of the Decentralized Administration fell under the auspice of the Ministry of Interior. Therefore, whatever information is announced by the Citizenship Directorates regarding their operation is not posted on any specific website or on the website of the Ministry of Interior so as to be immediately available to the public. The lack of proper information about the operation of the services creates serious difficulties for the applicants but also an additional burden for the employees since applicants are obliged to go in person to the services to seek information. As a typical example we could mention the recent decision to suspend public reception in the citizenship services as part of the precautionary measures against the spread of

-

⁵ Άρθρο 32 N. 4604/2019

coronavirus (Covid-19), which was not posted on the internet to be widely available to the public, but it was only posted at the entrance of the services.

An additional issue is the non-updating of statistical data by the Central Citizenship Directorate of the Ministry of Interior. These data, as the official source of information for those directly concerned, are of particular importance because they present a complete picture of the system of granting of Greek citizenship for the second generation and the system of naturalization of foreigners in general and in particular of the application processing, the number of employees and the number of interviews. The latest update of statistics took place in <u>July 2019</u>. Upon our telephone communication with the Central Directorate of Citizenship in January and February 2020 we were informed that the problem is due to the non-renewal of the information system and the issues of staffing, but without giving any official announcement to the public. The information we received was that the information system would be restored by the end of February and the statistics would be published in early March, something that has not happened so far.

In an effort to fill, as far as possible, the information gap that has arisen by the non-updating of statistical data, we have collected the figures that reflect the current pace of application processing for each Citizenship Directorate as derived from the information provided to us by the heads of the Citizenship Directorates (see Annex at the end of the report).

• Requests for speeding up the procedure

The heads of all Citizenship Directorates stated that the requests for speeding up the naturalization and citizenship procedure submitted to the services are relatively few in number. They mentioned that they strictly follow a specific <u>circular</u> of the Ministry of Interior, while in special cases, when not covered by this Circular, the heads of certain services address the cases to the Secretary General of Citizenship.

Archiving issues

We were informed by the Citizenship Directorate of Northern and Eastern Attica that their archive is not located all in the same place. A part of it is located in Aspropyrgos, at the Department of the General Archive of the Administrative Services Directorate of the Attica Region, which creates delays for those who want to receive their citizenship decision, which is located in Aspropyrgos. Thus, a citizen who wants to receive a citizenship decision, applies at the Directorate of Northern and Eastern Attica, which then looks for it there. This process is several times time consuming. It has also happened that a citizenship decision has not been properly archived and therefore cannot be traced.

A solution to this problem, that has been proposed by the head of the Citizenship Department of Northern and Eastern Attica, was to scan all the citizenship decisions that have been granted until now and to make them available in electronic form.

Errors in birth certificates

A general problem that persists concerns the name data errors in the birth certificates of the interested applicants, where a court decision is required to correct them. This process as it is very time consuming, further delays the process of granting Greek citizenship.

II. Good practices of Citizenship Directorates

Despite the obstacles and difficulties, we cannot ignore the fact that some Citizenship Directorates are trying to implement some good practices to improve the situation.

For example, in the Citizenship Directorate of Southern Attica, Piraeus and Islands, the possibility to submit naturalization applications upon phone appointment has reduced the congestion in the service and has contributed to its smoother operation, while in order to facilitate public service, it has been decided not to apply the priority order for lawyers as it is applied in other public services.

Also, in order to better inform applicants about the Greek citizenship acquiring process, this service has created an information form for citizens which explains in detail and step by step the whole procedure of acquiring citizenship.

In addition, so as to make the naturalization interview process less time consuming and exhausting for candidates, the specific service, complying – as we were informed – with the required standards of the relevant <u>Circular 39 of the Ministry of Interior</u>⁶, has decided that the ideal total number of questions that should be asked during an interview are thirty.

Finally, in the context of the situation as it emerged as a result of the appearance of the coronavirus (Covid-19), this specific service has decided to conduct interviews by teleconference so as to avoid postponements and to reduce the risk of pandemic. In the same context, due the submission of applications by registered mail as it is now done due to Covid-19, it has been decided to first proceed with a telephone communication with the applicants, in order to register their data and to send them electronically a very detailed guide with the supporting documents they should - depending on the category they fall - collect and send.

_

⁶ The Ministry of Interior by <u>Circular 39</u> on the instructions for conducting interviews, clarifies that the discretion of the naturalization committees is not unlimited and therefore they cannot go beyond its limits and the limits of the legislation as it is specified in the relevant circulars. This Circular was a result of the ambiguity that had been created regarding the implementation of the law and the number of questions that must be asked during interviews by the naturalization committees throughout the territory, where in some cases it was observed that the candidates were asked the excessive number of 90 questions.

III. Situation as a result of the appearance of coronavirus (Covid-19)

The quarter between the suspension of the reception of the public by the services on 16 March 2020 due to the preventive measures against the spread of the coronavirus (Covid-19) until their recent gradual reopening from Tuesday 9 June 2020 by a relevant decision of the Minister of Interior, significantly affected the operation of the Citizenship Directorates.

During this period, all Citizenship Directorates operated with reduced staff (specifically with three employees per directorate per day), which proceeded in shifts. As a result, it was impossible to handle any pending citizenship and naturalization applications, while several procedures were postponed, such as the operation of the naturalization committees and carrying out naturalization oaths. The reception of the public was done only in urgent cases and exclusively after their previous communication with the service and arrangement of an appointment. The submission of new applications or additional supporting documents was done only by registered mail or by courier, while any information regarding the Citizenship Acquisition Status was available only electronically through the application on citizenship status.

Several of these restrictions have been maintained, such as the suspension of the reception of the public, the submission of applications and additional supporting documents and information on the citizenship acquisition status. Nevertheless, the naturalization committees started functioning again and the interviews are conducted either in person or by teleconference. From the information provided to us, the naturalization interviews that were cancelled in March and April have taken place during June and July, while from September the rest of the interviews will be conducted. Naturalization oaths have also started.

The only exception is the Citizenship Directorate of Athens, which has not yet reopened the naturalization committees, because in the current circumstances its existing space is deemed unsuitable and the required minimum distance of one and a half (1.5) meters between employees and citizens cannot be met, as provided by the relevant <u>Circular</u> of the Minister of Interior. As we were informed by the head of the directorate, the Ministry of Interior and specifically the General Secretariat of Citizenship was asked to find a suitable place for the meetings of the Committee and the reception of the public (near the service).

IV. Generation 2.0 RED's recommendations

In relation to the above issues, evaluating the conditions based on the on-site visits that took place and taking into account the proposals of the heads of Citizenship Directorates, we proceed to the following remarks and recommendations to the competent bodies to improve the existing conditions in the Citizenship Directorates.

Regarding the issue of extreme delays in the processing of applications for the granting of Greek citizenship, we recommend:

- Additional staffing of the Citizenship Directorates with the ultimate goal of speeding up
 the procedures. At the current pace in the process of granting Greek citizenship, the
 processing of an application takes more than a year, while in some cases it reaches up to
 five years.
- Use of new technologies for a more efficient operation of the procedures and faster processing of applications, which has not taken place so far. The aim is to gradually achieve a complete digitization of procedures and to issue more citizenship decisions in a shorter period of time
- 3. **Establishment of more naturalization committees**, which will contribute to the faster processing of applications. In any case, there should be a remuneration of the members of the committees as it is provided by law, which will correspond to their workload and will act as an additional motivation for their formation.
- 4. **Immediate issuance of the necessary Ministerial Decisions** that are pending, in order to fill the legal gaps that have arisen and to implement the new procedure of examination in naturalization, as planned by the Ministry of Interior.
- → Regarding the lack of proper information of those concerned by the General Secretariat of Citizenship, we draw attention to the following necessary actions:
 - 1. **Obligation for reliable and timely information**, in the context of the relevant responsibility of the state towards those who have applied for Greek citizenship.
 - Immediate renewal of the website with all necessary information, such as updated supporting documents by category, application forms, contact details of each service and so on.
 - 3. **Regular updating of statistical data** by the Central Citizenship Directorate of the Ministry of Interior, which are also an important source of information for those concerned.
- Regarding the upcoming change of the examination system in naturalization, we set the following:

- 1. The real integration of foreigners, which should be a primary criterion for their naturalization. This means that when planning any revision of the naturalization system, it is always necessary to take into account each person's level of integration into the Greek society. In other words, naturalization should not be based only on an examination-based system, which may exclude third-country nationals who have lived in the country for many years and have acquired particularly strong social ties.
- 2. The need to take into account the special needs of candidates participating in the exam. In particular, special care should be taken for groups with special learning disabilities to facilitate their examination in accordance with international practice.
- 3. The possibility of electronic submission of documents and supporting documents for facilitation of beneficiaries and better interconnection and archiving of services.
- 4. **The review of the amount of fees** required for naturalization in order to further reduce them.

V. Epilogue

The issues in the process of granting Greek citizenship have as a direct consequence the deprivation of the right of third country nationals to a seamless access to procedures. In addition, this abnormal situation justifiably provokes the applicant's protests and aggravates the situation of uncertainty in which they find themselves, especially when there are applications that have not been examined for years.

In addition to the psychological impact that is created, the lives of some people are practically affected. Some cannot pursue the profession they want, as there are some "closed" professions that exclude people who do not hold Greek citizenship, such as the profession of police officer, firefighter or military. In other cases, people are deprived of the right to practice the profession they have studied, as a precondition is to be a Greek citizen, as it is the case of the lawyer's profession for the exercise of which the registration in the bar association is required.

Obviously, the daily life, life and plans of many people are affected, who, while they have already secured the right of acquiring Greek citizenship, are - without any fault of their own - trapped between administrative inflexibility, time-consuming procedures and bad administration.

Since these issues arise either from bureaucratic difficulties or from administrative practices or from institutional gaps, we call on the Ministry of Interior to take into account the recommendations and take immediate action to resolve them.

As an organisation, Generation 2.0 RED will continue to monitor and highlight the relevant problems to the competent bodies awaiting their response.

We warmly thank the Citizenship Directorates for their valuable contribution to our effort to record the current situation as well as for the constructive dialogue that followed on recommendations for its improvement.

ANNEX

Numerical data with the application processing pace, the total number of employees and pending cases

	Citizenship Directorate of Athens	Citizenship Directorate of Central and Western Attica	Citizenship Directorate of Northern and Eastern Attica	Citizenship Directorate of Southern Attica, Piraeus and Islands
Total number of employees per service	11 with the head of the Citizenship Directorate:	18 with the head of the Citizenship Directorate:	18 with the head of the Citizenship Directorate: Citizenship (5) Naturalization (7) Registry (5)	18 with the head of the Citizenship Directorate: Citizenship (6) Naturalization (7) Registry (4)

Application processing stage in Citizenship/Naturalization per service	Citizenship Directorate of Athens	Citizenship Directorate of Central and Western Attica	Citizenship Directorate of Northern and Eastern Attica	Citizenship Directorate of Southern Attica, Piraeus and Islands
Citizenship	minors April of 2017/ adults September of 2017	June of 2018	December of 2018	July of 2018
Naturalization	June of 2015	November of 2015	February of 2017	September of 2015

	Citizenship Directorate of Athens	Citizenship Directorate of Central and Western Attica	Citizenship Directorate of Northern and Eastern Attica	Citizenship Directorate of Southern Attica, Piraeus and Islands
Total number of pending cases per service	Around 8209 cases for all categories**	Birth/School attendance: around 2500 Naturalization: around 4500	Around 1000 cases per year for each category	 Birth – School attendance: 2806 Naturalization: 5438 ➤ Foreigner s: 5077 ➤ Co-Ethnic Greeks: 361

*The numerical data presented in the above tables are derived from the information provided to us by the heads of Citizenship Directorates in the Attica region during the period from November 2019 to March 2020 and reflect the stage of naturalization and citizenship application processing per service, the total number of employees and pending cases per service.

**The total number of pending cases was recorded on 17/09/2019 and sent with an information note to the New Secretary General of Citizenship upon assumption of his new duties. Since then many decisions have been issued and a large number of new applications has been registered. Data is not available today.