

# TOWARDS IMPROVING ACCESS TO GREEK CITIZENSHIP

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**Active  
citizens fund**

Fund operated by:

  
**BODOSSAKI  
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Implemented by:

 **Generation 2.0**  
For Rights Equality & Diversity

In partnership with:

 **HELLENIC LEAGUE  
for HUMAN RIGHTS**



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This text reflects the views of the authors and does not necessarily reflect the views of the EEA Financial Mechanism or the Grant Manager of the Active Citizens Fund Programme in Greece (the Bodossaki Foundation in cooperation with SolidarityNow).

The project "Citizenship in Practice" takes place within the framework of the Active citizens fund program, implemented by Generation 2.0 for Rights, Equality & Diversity and their partner the Hellenic League for Human Rights. The project started in April 2021 and will be completed in March 2023. More information about the project is available on the website: [ithagenia.gr](http://ithagenia.gr).

The €13.5m Active citizens fund program is funded by Iceland, Liechtenstein and Norway and is part of the European Economic Area (EEA) funding mechanism for the period 2014 - 2021, also known as the EEA Grants. The program aims to strengthen and enhance the sustainability of the civil society sector and to highlight its role in promoting democratic processes, enhancing citizen participation in the community and defending human rights. The Active citizens fund program for Greece is jointly managed by the Bodossakis Foundation and Solidarity Now.

For more information, please visit the website: [www.activecitizensfund.gr](http://www.activecitizensfund.gr).

[Generation 2.0 for Rights, Equality & Diversity](#) (Generation 2.0 RED) is an initiative launched by a group of so-called second-generation young people with migrant origins. Operating as an informal group as far back as 2006, its mission was focused on securing access to citizenship for the otherwise invisible generation of children born and/or raised in Greece from migrant backgrounds. Generation 2.0 RED was officially founded in 2013 when the group merged with the "Institute for Rights, Equality and Diversity (i-RED)", an independent research institute, combining scientific evidence with experience in the field.

Today Generation 2.0 RED is a non-profit organisation with an interdisciplinary team representing a mix of origins, pursuing a common vision of the right to equal and active citizenry in a society that respects diversity. Generation 2.0 RED follows a holistic approach, working with individuals as well as at the wider social and institutional levels. Our mission focuses on individual and community empowerment and equal participation in a diverse society, aiming to promote human rights, equality and diversity, and fight against racism, xenophobia and discrimination.

The organisation has been actively monitoring developments in the field of citizenship since 2006: the enactment of Law 3838/2010, and the social injustice caused by the [Council of State's decision 460/2013](#) which considered two of the changes brought about by this law unconstitutional;\* the subsequent adoption of Law 4332/2015, which at long last gave [the children of immigrants born and/or raised in Greece the right to acquire citizenship](#); as well as Law 4604/2019 and recently Law 4735/2020, which brought about significant changes in the system of naturalisation. Since 2015, when 'second generation' citizenship was legally secured, Generation 2.0 RED has been continuously monitoring the implementation of the legislation and the functioning of the relevant administrative bodies. In this context, in July 2020 the organisation published the [Report on the Citizenship Directorates of the Ministry of the Interior](#).

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\* Specifically the provisions concerning 1) the introduction of special procedures for the acquisition of citizenship for the children of immigrants (the 'second-generation') either from birth, if their parents have resided permanently and legally in the country for at least five consecutive years, or otherwise after the successful completion of at least six years of Greek education, and 2) the introduction of the right to vote and to stand as a candidate in local elections for certain categories of legally residing third country nationals

The [Hellenic League for Human Rights](#) is an association that has been active for many years in the field of the protection of human rights (founded in 1953).

HLHR is a member of the International Federation of Human Rights and participates in the National Commission for Human Rights. Since 2011, together with two other partners, it has been selected by the European Union Agency for Fundamental Rights (FRANET) as the national contact point for Greece, in order to collect data and information on fundamental rights and discrimination issues.

HLHR's areas of intervention include issues related to: sexism and gender-based violence, minorities, immigration and asylum, hate speech and racist violence, the justice system and penitentiary issues, and state-church relations. It fulfils its objectives through the study of citizens' problems; the submission of proposals and legislative analysis; advocacy; strategic litigation, raising awareness and contributing to the public debate around human rights and through the organisation of lectures, conferences, campaigns, publications and other events.

Between 2008 and 2009 the organisation drafted a proposal for a new [Greek Citizenship Code](#) which formed the foundation of the 2010 legislative reforms. In 2012 HLHR launched an online campaign entitled "[The children of immigrants living in Greece have the right to Greek citizenship.](#)" And also [testified before the Council of State](#) in the case examining the constitutionality of the 2010 citizenship reforms. HLHR continues to closely monitor developments in the field of citizenship access and rights, contributing its legal expertise wherever possible towards supporting the rule of law in this field. In this context, and in light of recent legislative developments, HLHR have released a statement entitled "[Citizenship in Exclusion](#)".



The project "Citizenship in practice" responds for the first time to the need to evaluate the administrative procedure of granting citizenship in Greece. The aim is to contribute to the equal access and enjoyment of the right to citizenship, by identifying issues and proposing solutions to improve the practices of the relevant administrative bodies. Whilst this publication is addressed primarily to the Greek administration, it also aims to inform interested citizens about the issues surrounding access to citizenship.

The report "Towards improving access to Greek citizenship" is part of the project "Citizenship in Practice". Generation 2.0 for Rights, Equality & Diversity wrote and produced this publication, incorporating comments from the Hellenic League for Human Rights (HLHR). The information regarding the legal framework and actions of the public administration is correct at the time of publication. The recommendations refer to the current legal framework.

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The project "Citizenship in Practice" was conceived in early 2020 with the objective of identifying issues in the implementation of citizenship legislation and proposing solutions to improve public administration practices. We have discovered that fair access to citizenship for migrants does not only depend on the existence of the relevant legislative framework but is also significantly influenced by the way in which it is implemented by the public administration. Thus, although the law provides for the processes, the administrative procedures in practice can often obstruct access to citizenship.

The launch of the project in April 2021 coincided with one of the most critical and far-reaching legislative changes to the naturalisation process in recent years. The new procedure replaced the previous regime of oral interviews before Naturalisation Committees with written examinations and introduced income criteria to verify financial inclusion. This has been the focus of our study, analysis and criticism over the last two years for the duration of the project, as well as the study of another significant administrative change in second-generation citizenship that has been underway over this period; the transfer of responsibility for examining applications to two newly established administrative divisions: the Regional Directorates of Citizenship of Attica and Central Macedonia.

Amendments to the procedures have been continuous and successive, culminating in the enactment of law 4735/2020 and a subsequent series of amendments and individual provisions in other pieces of legislation; the issuance of relevant Decisions, and the publication of circulars and instructions to the Administration. This abundant production of legislative and administrative texts started in 2020 and was completed in early 2022, creating the need for extensive monitoring and the comparative analysis and explanation of the new provisions. The successive and, in some cases, conflicting provisions even caused confusion within the Administration itself during the implementation of the new naturalisation system. Therefore, we first studied the legislation and its implementation before studying and evaluating administrative practices. The report "Greek Citizenship in Practice" attempts to bring together our experiences of monitoring the new system as a whole and to synthesise the conclusions drawn from the individual project activities over the two-year period.<sup>1</sup>

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<sup>1</sup> More details about our other project activities can be found on the website: [ithagenia.gr](http://ithagenia.gr)

The new legislation aimed to correct two central issues: first, the long delays in the process of acquiring citizenship for both second-generation applicants and those applying through the naturalisation route and, second, the potential lack of objectivity in the judgements issued by the various Naturalisation Committees. But whilst this was the goal of the Ministry of Interior when it established the new naturalisation procedures, to what extent have the provisions of law 4735/2020 been able to speed up the procedures for granting citizenship and make the naturalisation system more objective? To what extent, in other words, have these objectives been achieved by implementing these new provisions? These are the main questions that this report attempts to answer by evaluating the new regime and presenting proposals to improve the system, towards creating fair, impartial and modern procedures.

The first chapter summarises the old system and presents in detail the current legal framework following the amendments of the last two years. Then, the second and third chapters respectively assess the new system of naturalisation and the administrative changes to second-generation citizenship. The fourth and final chapter brings together our proposals for improving and modernising the procedures for acquiring citizenship.

The writing of this report was completed in January 2023. The data presented regarding pending cases and decisions as well as service staffing covers up until June 2022, which is the most recent official data available, published by the Ministry of Interior via parliamentary scrutiny processes.



**THE CURRENT LEGAL FRAMEWORK  
FOLLOWING THE AMENDMENTS  
OF THE LAST TWO YEARS**

# 1

## NATURALISATION OF FOREIGN NATIONALS

### 1.1 BACKGROUND: THE OLD SYSTEM AND THE MAIN ISSUES

Naturalisation as a way of acquiring Greek citizenship predates the establishment of the Greek state, as we can find references to it in the Constitutions of the Greek Revolution. Provisions for naturalisation were also contained in the old Code of Greek Citizenship (Law 3370/1955), which was in force from 1955 until 2004, with various amendments. Modern provisions for the acquisition of citizenship were gathered into one piece of legislation (Law 3284/2004), the Code of Greek Citizenship (CGC). The naturalisation procedure for people of foreign origins forms a key part of this. The pre-conditions for qualifying for naturalisation are an essential part of this procedure. For the most part, they were consolidated after the significant amendments introduced by Law 3838/2010, and most then remained unchanged for about a decade. The conditions are divided into the two categories of formal and substantive conditions.

The formal requirements include, first of all, the age of majority and the absence of criminal and administrative obstacles. Persons wishing to apply must also have completed at least 7 years of previous lawful residence under one of the following statuses: long-term, 10-year, international protection, humanitarian reasons or as a family member of a Greek or EU citizen. EU citizens, the spouses of a Greek citizen with a child, those who have parental care of a child of Greek nationality born in Greece, as well as stateless persons are exempt from the 7-year period. These categories of persons can apply after 3 years of continuous lawful residence. Finally, in 2018, Law 4531 added the possibility to naturalise persons holding other residence titles (e.g. residence permit for dependent work) after 12 consecutive years of lawful residence.

A person that meets these conditions would first go to the town hall of their area, accompanied by two Greek citizens as witnesses, to make a naturalisation declaration. They would then submit the application of naturalisation to the Directorate of Citizenship, together with the declaration and other supporting documents.

The substantive conditions relate to integration into the country. From 2010 onwards, the criteria for integration were: sufficient knowledge of the Greek language, familiarity with Greek history and culture, professional and general economic activity, as well as other supporting factors, such as public or charitable activities, attendance of Greek educational institutions, participation in social organisations or bodies of which Greek

citizens are members, family ties with a Greek citizen, stable fulfilment of tax and insurance obligations, and the ability to work in the Greek language. In addition to these, the person had to prove that they could actively and substantially participate in the political life of the country.

These substantive requirements, under the old system, were examined by Naturalisation Committees in an interview with the applicant. These Committees were composed of five members: the head of the relevant Directorate, a member of the teaching and research staff of a Higher Educational Institution, a member of one of the Directorates of Secondary Education, a representative of the Council of Decentralised Administration, and a member of the National Human Rights Commission. The "Book of Concise Information on Greek History, Geography and Culture" was available for interviewees to prepare themselves for the interview, although its contents were not exhaustive or restrictive as regards the questions that the Committees may pose, and as such the use of other sources of information was encouraged.

These procedures were characterised – especially in the two large urban centres – by a long wait for the formal requirements to be assessed and an invitation to interview to be issued, and then a decision taken. In addition to the cumbersome bureaucracy, the understaffing of the administrative bodies concerned played a large role in these enormous delays, which continue to be an issue to this day.

Another issue that had been observed in the old system was the lack of uniformity in the way the various committees operated, and in the level of difficulty of the questions they posed, leading to questions about the fairness of the system.

These issues therefore had given rise to the need to amend the naturalisation system in order to make the procedures more objective and homogeneous throughout the country.

Law 4604/2019 was therefore designed to amend the way in which the essential requirements were to be examined by the Naturalisation Committees. An examination, conducted by the Committees themselves, at B1 level for oral comprehension/production and written comprehension and at A1 level for written production, would test for sufficient knowledge of the Greek language. Those who had already obtained recognized equivalent certificates of attainment in Greek or in the Greek language, as well as those who had successfully completed 3 grades of secondary education in a Greek school or who had a higher education degree from a Greek higher education institution would be exempted from this exam. A simplified examination would also be provided for persons over 65 years of age and persons over 55 years of age with at least 20 years of residence in Greece.

In order to examine applicants' knowledge of Greek history, culture, the institutions of the constitution, the political life of the country and political history, the committees would be provided with a common bank of questions to draw from.

Finally, as regards the verification of economic integration, applicants would be required to submit as supporting documents the tax returns for their qualifying years of lawful residence in the country.

The bank of questions, known as the Item Bank was in the process of being prepared in 2019 but was not published before elections were held in July 2019, after which the new government suspended the provisions of Law 4674/2020, and thus the system designed in this legislation was never implemented.

## 1.2 THE NEW SYSTEM

In 2020, however, the naturalisation procedure for foreign nationals underwent extensive legislative change. Law 4735/2020, according to the legislator, aimed to provide an objective, transparent and speedy method of granting Greek citizenship, introducing crucial amendments, especially with regard to the examination of the substantive requirements.

The new procedure would officially replace the old on 1 April 2021, and introduced, for the first time, a national written examination; the Certificate of Knowledge Adequacy for Naturalisation (PEGP). These examinations are now held at various examination centres throughout the country twice a year, every May and November, to test applicants' knowledge of the Greek language as well as Greek history, geography, political institutions and culture.

The topics selected for the examinations are derived from the Item Bank, a bank of 500 questions, which has been prepared by a special committee and is published on the website of the Ministry of Interior. A candidate is considered successful when they obtain 70% of the maximum possible marks overall, with a grade of at least 66% in the language test and 50% in the other subjects. is considered a pass mark.

Persons over 62 years of age, those with a certified learning disability and persons with a 67% physical disability are excused from the written examination and are instead tested orally, but again using questions from the Item Bank. Those who have attended a Greek school, either through 9 years of primary and secondary education, or 6 years of secondary education, and those who hold a degree, masters or doctorate from a Greek higher education institution are also not required to sit the PEGP.

Passing the PEGP is now a prerequisite for an application for naturalisation. Persons who had already submitted an application for naturalisation but had not yet been interviewed when the changes came into effect on 31 March 2021 are also obliged to complete the exam and submit it to the Directorate of Citizenship. Applications to participate in the exam usually have a fee of €150 but this fee is waived for one exam sitting for those who had already submitted an application prior to the changes.

Regarding the other conditions of economic and social integration, as well as the potential to participate in the political life of the country, Law 4735, and the administrative acts resulting from it initially provided that these would be examined in a short 30-minute interview by a three-member Naturalisation Committee. The three-member Naturalisation Committees, based on the original decision, were to be composed of 2 officials from the Regional Directorate of Citizenship and 1 official from another Regional Directorate or from the Central Directorate of Citizenship (via teleconference). The invitation to an interview would also ask for additional supporting documents proving economic and social integration, which would have to be presented before the interview date.

A very important parameter which was also included for the first time as part of these changes is stable employment as a presumption of financial inclusion and in particular the minimum sufficient income, which was added as a basic condition by a Ministerial Decision. This is calculated on the basis of the minimum wage over the period of qualifying lawful residence,<sup>2</sup> and applies retroactively to pending naturalisation applications submitted before 1 April 2021.

These interviews under the new system began in October 2021, but were only conducted for two months, since in December 2021 Law 4873/2021 came into force, amending article 5A of the Citizenship Code. These amendments abolished the oral interview and decreed that the recommendation for the naturalisation decision would henceforth be derived only from the examination of the additional documents provided to demonstrate economic and social integration. The invitation to an interview by the three-member committees is only issued in the event of doubts about whether the requirements of the economic or social criteria have been met. Furthermore, the criteria of proving the possibility of participating in the political life of the country has been removed from the essential requirements.

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<sup>2</sup> See Annex 2 for tables of sufficient income by year and marital status.



Law 4735/2020 also abolished the possibility of filing an objection against a negative recommendation by a Committee. In simple terms, the administrative appeal stage has been abolished, and the applicant can now only take legal action against a negative decision by filing a petition for annulment with the competent Administrative Court of Appeal.

Finally, since 1 April 2021, there is no longer a need to make a declaration at the Town Hall before submitting the application for naturalisation to the Directorate of Citizenship, as this was purely a symbolic step.

## 2

## SECOND GENERATION CITIZENSHIP

### 2.1 BACKGROUND: IMPLEMENTATION OF THE NEW SYSTEM AND THE MAIN ISSUES IDENTIFIED

People of migrant origin who were born, raised, and attended schools in Greece have not always been able to acquire citizenship through a dedicated procedure other than naturalisation. The legislator was very late in recognising special citizenship rights for these children and only did so in 2010 with Law 3838, which brought about significant changes to the Citizenship Code.

Article 1A provided for two cases of the acquisition of Greek citizenship: in the first case, the child of foreigners who is born and continues to live in Greece to parents who both reside permanently and legally in the country for at least five consecutive years, acquires Greek citizenship from birth, provided that the parents submit a joint declaration and application for registration of the child in the municipality of their permanent residence within three years of birth. In the second case, a child of foreigners who has successfully completed at least six grades of Greek schooling in Greece and resides permanently and legally in the country acquires Greek citizenship from the completion of the six-year period of schooling by means of a joint declaration and an application for registration in the register of the municipality of permanent residence submitted by his parents within three years of the completion. If this time limit expires and the parents have not submitted the joint declaration, the article also

provides the possibility for the young person to take the necessary steps themselves upon reaching the age of majority.

However, these provisions were not implemented for a long time. In 2011, the Council of State, with decision 350/2011, ruled that some provisions of Law 3838/2010, including Article 1A, were unconstitutional, and referred the case to the Plenary for final judgment. Subsequently, in 2013, the Plenary of the Council of State, in decision 460/2013, also ruled that the provisions of Law 3838/2010 were unconstitutional, and they were repealed.

In 2015, the legislator again attempted to introduce provisions on second-generation citizenship into the Citizenship Code, in an amended form to take into account the judgement of the Council of State. Law 4332/2015 therefore introduced two new articles into the Code.

The first category, in article 1A of the Code, concerns the child of a foreigner born in Greece, and establishes their right to acquire Greek citizenship under the following conditions: a) Enrolment in the first grade of a Greek primary school and continued attendance at a Greek school at the time of submission of the declaration-application of paragraph 2. b) Prior continuous lawful residence of one of the parents for at least five years prior to birth. If the child was born before the completion of the aforementioned five-year period of residence, the right to acquire Greek citizenship is established upon completion of 10 years of continuous lawful residence of the parent. In addition, at the time of application, one of the two parents must have a valid lawful residence status in the country (10-year/long-term/second generation residence permit or refugee status, to be an EU citizen, have permanent residence as the spouse of an EU citizen or a Greek citizen, or lawful residence by ancestry).

The second category, in article 1B of the Code, refers to minors and young people who have successfully completed 9 years of primary and secondary education or 6 years of secondary education in a Greek school or have a secondary school leaving certificate from a Greek school and a degree from a Greek higher education institution. If the right to acquire Greek citizenship is achieved while the foreigner is a minor, then they retain the right to submit the application up to the age of 21. In case the right to acquire citizenship by virtue of attending a Greek school is established after the foreigner has reached the age of majority, the completion of secondary education cannot exceed 23 years (of age), and the application for citizenship can be submitted up to 3 years after the completion of education. Persons who have a Greek higher education degree may apply up to 3 years after the completion of their studies. A prerequisite for any person establishing eligibility under the above cases is lawful residence in the country at the time of application up to the acquisition of Greek citizenship.

Finally, Article 31 of Law 4604/2019 provides for an exception for minors with a disability of more than 80% certified by a competent public body and stipulates that certificates for the provision of specialized care services and psychosocial or therapeutic rehabilitation interventions may be accepted instead. In cases where citizenship is acquired on the basis of education under Article 1B, these certificates must cover at least nine years. The relevant procedure shall be set out in a Ministerial Decision.

## **2.2 THE LATEST LEGISLATIVE CHANGES AND THEIR OBJECTIVES**

The acquisition of citizenship by birth and/or education has not undergone any substantial changes since it came into force from 2015 onwards. In 2020, though, successive legislative amendments have procedurally affected some of the existing provisions.

Firstly, Law 4674/2020 repealed the Ministerial Decision that determined the certificates that need to be presented in the case of foreign minors with a disability of 80% or more, certified by a competent public body. Since then, no new decision has been issued, with the result that the special provision for disabled children has not yet been implemented, 4 years after its adoption.

Law 4735/2020 introduced changes in the organisation and operation of the General Secretariat of Citizenship. According to the Ministry of Interior, the aim was, on the one hand, to lessen the load borne by the Citizenship Directorates, which until then had been processing both naturalisation applications and applications based on birth and/or education, and on the other hand, to speed up the processing of second-generation applications in the two major urban centres. In this context, new Regional Directorates of Citizenship were established in Attica and Central Macedonia. Following this provision, from October 2020 onwards, the existing Directorates of Citizenship attached to these two regions will only examine naturalisation applications and not applications made under Articles 1A and 1B. The two new Regional Directorates of Citizenship have exclusive competence for these applications, both pending and new.

# II

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## **EVALUATION OF THE NEW NATURALISATION SYSTEM FOR FOREIGN NATIONALS**

The continuous and extensive legislative and administrative amendments that have taken place from 2020 to date have radically changed the naturalisation system. Change, though, does not necessarily imply modernisation, functionality or improvement. In fact, the successive legislative changes to the criteria, the oral interview and other essential aspects of the procedure initially brought further delays and confusion in the implementation of the law by the administration.

Now that sufficient time has passed for the new procedures to be fully implemented and operating as they should, we will here examine the main issues we have identified, namely the examination procedure for obtaining the PEGP, the requirements for obtaining citizenship (such as the financial criteria), as well as staffing issues, backlogs and the processing rate of applications.<sup>3</sup>

# 1

## CERTIFICATE OF KNOWLEDGE ADEQUACY FOR NATURALISATION (PEGP)

### 1.1 THE SCIENTIFIC COMMITTEE

The Scientific Committee was established by the General Secretariat of Citizenship to establish and operate the bank of questions that the examinations are based on, known as the Item Bank; renewing and selecting the subjects, and supervising the examination process for the award of the PEGP. The Committee was created on 24 November 2020 and has a three-year term of office. It is composed of seven members, who are university professors, and mainly historians.

Whilst the academic qualifications of the members of this Committee are certainly important and significant, it does not automatically follow that the current composition of the Committee represents a solution to the problem it was created to solve.

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<sup>3</sup> See [Recommendations on the Substantive Conditions for Naturalisation](#) (available only in Greek).

The Committee has been formed to carry out a new, highly specialised examination procedure, which is not part of an educational curriculum but of the naturalisation process. Their main task is to assess, through the examinations, to what degree the candidate has integrated into Greek society and, consequently, to decide whether or not to grant them citizenship. In this context, it is observed that the composition of the Commission is somewhat one-sided; social and political scientists, experts in integration issues, teachers with relevant specialties and senior officials of the Ministry of Interior, some of whom have significant previous experience as members of the former Naturalisation Committees – who would have contributed to the achievement of the main objective – are absent.

## 1.2 THE ITEM BANK

The Scientific Committee produces the Item Bank. This bank is a key pillar of the new naturalisation system, as the questions it contains form the material for the PEGP examinations. The Bank was first published on 18 February 2021 on the website of the Ministry of Interior, a little less than 3 months before the first exam, which was held in May of that year. Consequently, participants at that time had little time to prepare and to study the 500 topics it contains.

Initially, the Ministry published only the questions, without the official correct answers. Given that many of the questions may have more than one correct answer, this created uncertainty for examinees during their preparation. During this time the first copies of the Item Bank were published by private publishers, but these contained questionable or incorrect answers to some questions. On 13 April 2021, the answers to the questions were finally published on the Ministry's website, but some of them were repeatedly changed even just a few days before the first examination. Since then, and even up to the present day, more errors or omissions in answers have been identified, especially in the written and spoken comprehension, which have in some cases caused controversy among the markers.<sup>4</sup>

**The online platform** in which the Bank is located is also not very functional and not at all user-friendly. In order to find it, one has to look on the website of the Ministry of Interior in the category of the General Secretariat of Interior, where in

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<sup>4</sup> These errors have been identified following Generation 2.0 RED's own study of the Bank, as well as by exam candidates and teachers who have contacted us.

one of the subcategories under the name "Certificate of Knowledge Adequacy for Naturalization", the Item Bank can be found. The questions and answers are posted by category in pdf files. In some subjects, such as history, the questions and answers are in the same file; in others, such as geography, they are in different files.



*The Item Bank as it is available online*

Along with the current Item Bank, the old manual used for candidate preparation before interviews with the Naturalisation Committees had remained on the website of the Ministry of Interior until the middle of 2022, constituting a source of confusion for many candidates who had continued to read the old manual rather than the new Item Bank. It is also observed that no concerted effort has been made to inform the public about, or to promote the new Item Bank.<sup>5</sup> Finally, its publication on the internet does not ensure universal and uninterrupted access for candidates; it should be noted that not everyone has access to the internet, and access from mobile phones to government websites is not always possible.

**The most problematic element of the Item Bank, though, is its content.** From the moment of publication, it has been the subject of extensive critique by civil society

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<sup>5</sup> See the recommendations on the strategic active promotion of naturalisation by the authorities in our report on Good practices in the naturalisation process in European Countries, (available only in Greek) Generation 2.0 for Rights, Equality & Diversity, Athens October 2022, p. 84.

and the media because the difficulty level of many of the topics is unprecedented. The sterile memorisation of sophisticated answers is not necessarily helpful in ascertaining a person's degree of integration in Greece, which is after all the purpose of the Item Bank in the first place.

Questions such as, *who was Mordechai Frizis; who was Aspasia Manos; how many deans and secretaries are in the Presidium of the Parliament*; or the fact that to the question "what is the Supreme Court?" the required answer is: "the court of cassation for civil and criminal justice of Greece" are unnecessarily obscure and would stump even many Greek historians, lawyers and political scientists.

**Item 14**  
**Fill in the blanks:**

**After the revision of the Constitution in 2001, The Conference of Presidents by ..... or by majority shall appoint the members of the independent authorities provided for in the Constitution. By.....or by majority the..... ,the ..... and .....members of the Statistical Authority shall be selected, and they shall also express an..... after the.....for the selection of judicial officials in leading positions of the judiciary.**

*Topic from the category of political institutions*

Many of the questions, therefore, are unnecessarily difficult, rather than general knowledge for the average Greek citizen. They are in fact rather like Trivial Pursuit questions. The difference, however, is that in the case of the Item Bank they are exam questions rather than casual fun. They can, and must, be perceived with the appropriate seriousness since the acquisition of citizenship is a very serious issue for applicants, with very real stakes and consequences for their lives.

As we have stressed in our assessment report on the Item Bank,<sup>6</sup> the attempt to codify and measure the integration of a person into Greek society has been fraught with major problems from the outset. There are two main reasons for these problems,

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<sup>6</sup> [A Critical Assessment of the Item Bank](#) (available only in Greek) Michalis Sotiropoulos, Lecturer at the Department of Political Science, and postdoctoral researcher at the Department of History and Philosophy of Science, EKPA, & Elena Psyllakou, Postdoctoral Researcher, Social Theory and Communication, EKKE. The report was published as part of the project "Citizenship in Practice" on 14/05/2021.



the first of which is that this automatically leads to a process that assumes that there is one 'correct' way of inclusion and that it is objectively measurable, and secondly, it forms a one-dimensional and static perception of citizenship that does not take into account the specific characteristics of the applicants (professional, geographical, class, gender); their subjective experiences and the particular ties they have formed with their new country, combined of course with whatever cognitive skills they bring with them from their previous country, because they will necessarily be functionally literate in more than one language, which is in itself a skill.

Despite the opposition and criticism it has received from its inception to date, the Item Bank has not undergone any substantial changes or improvement. The only modification that has been made is the replacement of some topics with other similar topics. The volume of the material combined with the difficulty of many of the topics not only act as an obstacle to success in the PEGP examination, but also act as a deterrent for people who have resided in the country for many years, and have strong ties with Greek society, to even begin the process of acquiring Greek citizenship.

### 1.3 THE EXAMINATION PROCESS

As mentioned in chapter one, the PEGP examinations are carried out twice a year, in May and November. They are primarily written exams and have just one section on oral production in Greek. The organisation of the examinations follows a decision issued by the Secretary General for Citizenship,<sup>7</sup> which sets out all the details of the examination and defines the role of the Organising Committee.

#### SUBSTANTIVE ISSUES WITH THE NEW EXAMINATION METHOD

Before proceeding to the analysis of the organisation of the examinations, we must first focus on the most crucial element of the new system, namely the method of examination chosen. If the content of the Item Bank is the first part of the problem, the second is the written format of the examinations.

The examination procedure for the Certificate of Knowledge Adequacy is primarily a written test, with true-false, multiple choice, fill-in-the-blank, matching, and short

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<sup>7</sup> You can find all the decisions in the "Resources" section at the end of the Report.

development and writing (essay) questions. There is also an oral production section in front of examiners. As mentioned in chapter one, those who are exempt from the written examination are tested on the same topics orally. This includes those who are over 62 years of age, persons with a Certified Disability of 67% and above, and persons with certified learning disabilities. Those who have completed their education in a Greek school or have a degree from a Greek University are also exempted from the examination. Taking all this into account, several concerns arise.

Firstly, the majority of third country nationals who are eligible to apply for naturalisation are older people, often over 45-50 years old, which is a category of persons who have most likely not taken a written examination for many years, if ever. In addition, the country's integrated foreign population is by no means homogeneous. There are, for example, people with a high level of education from their country of origin, people who are illiterate or have not completed compulsory education in their mother tongue, and people who – regardless of their level of education – do manual work here, or work in professions that do not require them to use the written word in Greek. Furthermore, the state has not historically intervened in the organised integration of this population, as it has never provided programmes for adults to learn Greek, for example.

These facts all therefore lead to the following paradox: **the Greek state suddenly comes along and obliges naturalisation applicants to pass a demanding written test which is identical for all applicants, without ever having provided any help to integrate this population through language training, and without taking into account the characteristics and profile of this population.** Even the allowances made for the groups excused from the written test can be described as insufficient:

- Firstly, *the exemption from the written exam for those over 62 years of age could be extended, and years of residence could also be taken into account.* For example, in the system envisaged in 2019, two age categories were provided for, while years of residence in the country were also taken into account: the first exemption category was for those over 55 years of age who have been legally residing in Greece for 20 consecutive years, and the second category was for those over 65 years of age. These two categories would be exempted from the general examination and would be tested on the basis of more lenient criteria (A2 level in Language, instead of B1, and a specially designed test by the Naturalisation Committee for the other subjects). Therefore, the age limit could be reduced, provided there is no specific reason why not.

- Secondly, *why are persons with physical disabilities exempted from the exam, and not persons with mental disabilities?* Neither during the discussion of the bill in 2020 nor afterwards has any justification for this discriminatory treatment between disability categories been justified.

Another question that these examinations give rise to is that of who is ultimately entitled to be exempted from them? In this regard, there has been an unprecedented regression in the criteria with multiple subsequent amendments to the initial exemption criteria. Whilst exemption is linked to the level of Greek education already obtained by an applicant it was initially sufficient to have successfully completed either three years of secondary education or a degree/postgraduate/doctoral degree from a Greek university. With an amendment introduced in April 2021, the requirements for attending secondary education were tightened, raising the requirement to six years of secondary schooling or 9 years of primary school and high school.<sup>8</sup> These strict criteria we judge to be more suited to the criteria for obtaining citizenship based on second generation status rather than through the naturalisation process. Furthermore, quite apart from the criteria themselves, another serious issue was the confusion caused to the administration by these multiple changes made to the criteria within the space of just a few months, with the result that administrators were unsure which provision applied to which applications, given the multiple stages in the application process.

In addition, one wonders why those who have a Greek language certification of B1 level or above from officially recognised language examination bodies are not also exempted from the Greek language section of the examination. It is an exemption that was included in the 2019 naturalisation legislation and is a legitimate question raised by many people who have these language certificates.

## THE EXAMS IN NUMBERS

So far,<sup>9</sup> four examinations have taken place: the first on 16 May 2021, the second on 7 November 2021, the third on 8 May 2022 and the fourth on 13 November 2022. The data from these forms the basis of the evaluation of the new examination method.<sup>10</sup>

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<sup>8</sup> Read more in the Generation 2.0 RED [Press Release](#) published on 13/04/2021.

<sup>9</sup> This report was written in January 2023.

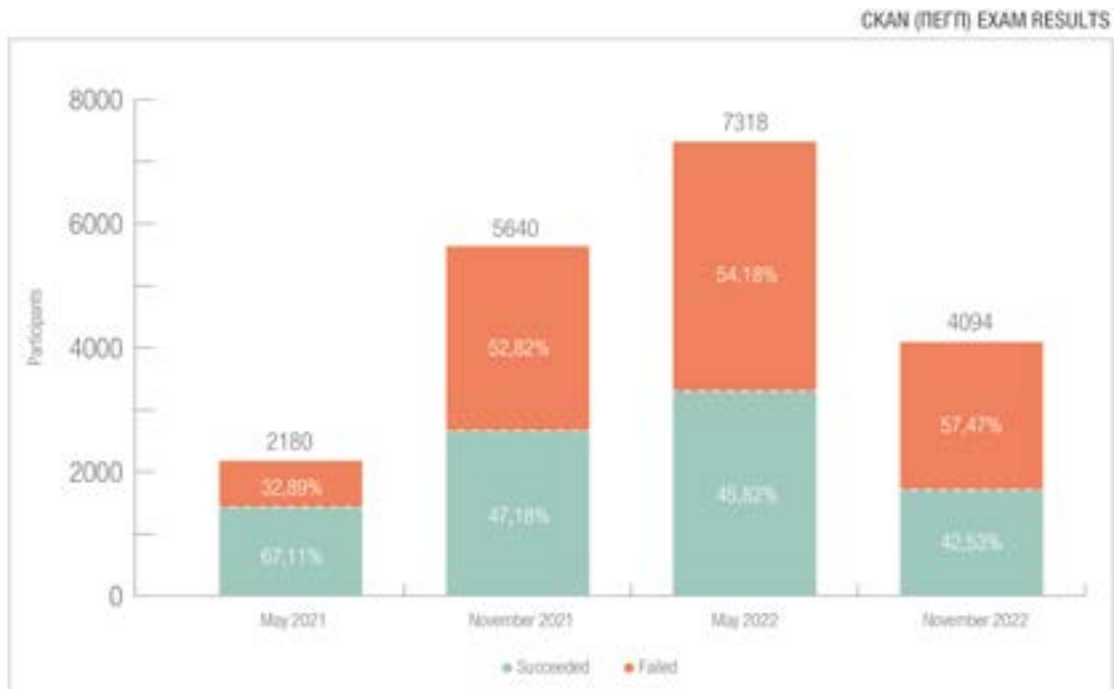
<sup>10</sup> Official data from the General Directorate of Citizenship which has been published or communicated in writing by the General Directorate of Citizenship by e-mail at the request of Generation 2.0 RED.

- **16 May 2021:** The first examination with the new system was administered in 20 examination centres in seven cities in Greece: Athens, Thessaloniki, Patras, Tripoli, Larissa, Ioannina and Heraklion. 2,425 candidates applied to participate, and on the day of the examination 2,180 candidates participated, of whom 1,463 passed the examination. **The pass rate was 67.11%.<sup>11</sup>**
- **7 November 2021:** 60 test centres in 12 cities were designated for the second examination: Athens, Thessaloniki, Patras, Heraklion, Larissa, Rhodes, Ioannina, Tripoli, Kalamata, Korinthos, Komotini and Chalkida. The total number of applications was 6,418. Of these, 5,070 were applicants who had already applied for naturalisation before 31/03/2021 and 1,348 were persons who wished to apply in the future. Of the total applications, the number of people who sat the test was 5,640, of which 4,460 had files pending under the old system and 1,180 had applied under the new procedure. Of these, a total of 2,661 persons passed the examination, 2,050 and 611 respectively. **The pass rate in the second examination dropped to 47.18%**, meaning that less than half of the participants received the PEGP.
- **8 May 2022:** The number of examination centres designated for the third examinations increased to 98 in 13 cities: Athens, Thessaloniki, Patras, Heraklion, Chania, Chania, Larissa, Rhodes, Ioannina, Tripoli, Kalamata, Korinthos, Komotini and Chalkida. The total number of applications to participate was 8,281. Of these, 5,730 were made by persons who had a pending file with the citizenship services and 2,551 were new applications. The total number of people who sat the exam was 7,318; 5,031 that had applied under the old system and 2,287 under the new system. The total number of successful candidates was 3,353 of which 2,153 had a pending file and 1,200 were new applications. **The pass rate for these examinations is estimated at only 45.82%.**
- **13 November 2022:** 55 test centres in 11 cities were designated for the fourth examination: Athens, Thessaloniki, Patras, Heraklion, Larissa, Rhodes, Ioannina, Tripoli, Corinth, Mytilene and Chalkida. Only 4,564 applications were submitted to sit the exams; 2,576 by persons with a pending naturalisation application and 1,988 by persons intending to apply for naturalisation under the

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<sup>11</sup> Based on publications by the Ministry of Interior, the pass rate for the May 2021 exam was 72.6%. According to the notification from the General Directorate of Citizenship, the pass rate was 73.4%. According to our calculations, the rate is 67.11% (2,180 entries of which 1,463 were successful). Therefore, the success rates of 70% and above are incorrect.

new system. On the day of the examination, 4,094 candidates sat the exam, 2,335 of whom had applied under the old system and 1,759 under the new system. Of these, a total of 1,741 were successful, 936 and 805 respectively from the two categories. **The pass percentage was the lowest recorded so far: 42.52%.**



Two main conclusions can be drawn from these figures. Firstly, the pass rate in the exams is steadily decreasing. Secondly, it appears that the failure faced by many candidates, combined with the tightening of other naturalisation requirements, may have ultimately affected the level of participation, with around 3,200 fewer people taking the last examination compared to the earlier one.

The first examination for 2023 will take place on 19 March instead of the scheduled date in May, probably due to national elections in the coming months.

## ISSUES WITH THE ORGANISATION OF THE EXAMINATIONS

**Informing** potential applicants about the details of the new system and about upcoming scheduled examinations ought to be the first and most important stage

of the organisation process, and the Administration's efforts in this regard can be described as insufficient and fragmented. When the new system was being implemented in April 2021, many who had applied under the old system received a short text message on their mobile phone instructing them to apply for the first exam. Due to the lack of any further information, there was a misconception by most that it was mandatory for them to take the exam in May 2021. This led to people who had not prepared properly sitting the examination, well as a number of people who were unaware of the new financial criteria requirement, which led to the rejection of their naturalisation application in any case.

For this reason, a number of third country nationals who had applied under the old system are still convinced that they will be called for an interview by the Naturalisation Committee and are simply waiting. The failure to effectively inform the public about the way in which the system has changed means that many people who have submitted an application for naturalisation are unaware that the system has changed at all, and certainly unaware that they are now obliged to apply to sit the PEGP exam in order for their application to progress. Given the huge delays that have characterised the naturalisation application process, this is hardly surprising. Furthermore, not all people have the same level of access to the internet and news bulletins.

To sum up, as regards the organisation of the examinations, the most significant problems were observed during the first examination period. Examinees from various examination centres have reported that the process was exhausting, as it took a total of 12 hours due to long delays in starting and completing the procedure.<sup>12</sup>

In the later examinations, delays were reduced and other issues had been addressed. On the one hand, the Organising Committee had prepared the process more effectively, and on the other, part of the procedure had been modified, consolidating all the sections of the written test into one paper.<sup>13</sup> Consequently we received no further complaints from candidates in connection with the conditions and duration of the examination.

In conclusion, having analysed the various aspects of the new examination process, including the Scientific Committee and the Item Bank; the results, and

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<sup>12</sup> Many candidates from different test centers contacted Generation 2.0 RED to report their experiences of taking the PEGP exam. See our [press release](#) and also [this newspaper article](#) in *Lifo* by Thodoris Antonopoulos (available only in Greek).

<sup>13</sup> In the first examination, the comprehension and production of written and oral/listening comprehension modules were separate from the geography, history, political institutions and culture modules. The subjects were thus sat in two phases, which contributed to the delays in the process.

the organisation and the substance of the examinations, we come to the following general conclusion: The homogenisation of the procedure, with the aim of making it more objective and impartial, has failed to guarantee the most important thing: that it is ultimately fair for the candidates. The new examination system for obtaining the PEGP has a number of shortcomings which ultimately serve to make it a deterrent for part of the migrant population. In practice, people who have lived here all their lives, having acquired objectively strong ties with Greek society, feel themselves inadequate to pass the examination. The problem, though, lies not with them, but with the overly strict requirements of the new Item Bank. As a result, many potential applicants simply do not apply for naturalisation.

## 2

## NATURALISATION REQUIREMENTS: THE FINAL ASSESSMENT OF THE APPLICATION

Apart from the PEGP examination which is now the first part of the procedure, the formal and substantive requirements for a person to become a Greek citizen are examined when the naturalisation application is submitted to the Citizenship Directorates, where the overall assessment of the application is carried out. The most significant changes in the last two years have been in the substantive requirements and, in particular, the introduction of income criteria for the first time, representing a drastic change to naturalisation requirements. In addition to these, other amendments to substantive or formal requirements as well as procedures that have had a major impact on the new naturalisation system will be commented on below.

### 2.1 DOCUMENTING FINANCIAL INCLUSION

#### WHEN AND HOW WERE INCOME CRITERIA INTRODUCED?

First of all, it is worth looking at how the income criteria came to be introduced into the new naturalisation system. In the previous legislative framework, the presumptions of integration included, indicatively but not restrictively, professional and economic

activity. In other words, they were not considered a prerequisite, nor was specific evidence required and, in any case, they merely formed part of the overall evidence of integration in any given application. The 2019 legislative framework provided for the inclusion of all tax returns from qualifying years of lawful residence as supporting documents, without, however, applicants being required to demonstrate any specific income level. Rather, these documents served as proof that foreign citizens, while legally residing here, had complied with their tax obligations to the state.

In 2020, during the consultation period for the bill that would have introduced amendments to the naturalisation system, stable employment and a minimum annual income were included among the essential requirements. At that time, and until the bill was passed in Parliament, there was strong opposition to this new provision, which was described as unnecessarily strict and unfair by civil society, opposition parties and even some MPs from the governing coalition.<sup>14</sup> With a legislative 'improvement' just before the law was passed, the annual income criteria were removed from the provisions. The former Minister of Interior, Takis Theodorikakos, had stated at the time from the floor of the Parliament that the removal of this provision was a reasonable and moderate move to avoid making the acquisition of Greek citizenship prohibitive for a large number of people who wish to become Greek and otherwise fulfil the requirements.

However, a few months later, in April 2021, the "prohibitive" income criteria were reinstated,<sup>15</sup> this time, through a Ministerial Decision that detailed what exactly is to be considered a presumption of economic and social inclusion. The minimum income that must be proven starts at €7,500 a year and increases according to the number of dependent family members.<sup>16</sup> This income level must be demonstrable for either 5 years within the last seven years, or for 7 years within the last 12 years, depending on the type of residence permit held by the applicant. EU citizens and those who are spouses or partners of a Greek with a child/children need to prove this income level for a period of 3 years. Apart from this minimum income requirement, there is other financial documentation that can be included in the file to prove economic and social inclusion, but these are not a prerequisite.<sup>17</sup>

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<sup>14</sup> Generation 2.0 RED had submitted comments to the public consultation and had highlighted the issue in a [Press Release](#) on 12.09.2020. The Hellenic League for Human Rights, following an invitation to the hearing of the bodies of the Standing Committee on Public Administration, Public Order and Justice, sent [written comments](#) on the citizenship provisions of the draft bill under discussion by the Ministry of Interior.

<sup>15</sup> See the press releases from [Generation 2.0 RED](#), published on 27.04.2021, and of the [Hellenic Union for Human Rights](#), published on 07.05.2021.

<sup>16</sup> See Annex 2 for details.

<sup>17</sup> A detailed list can be found in Annex 1.



The financial criteria began to be implemented in practice at the beginning of 2022, following two amendments by Ministerial Decisions and two circulars which clarified various issues.<sup>18</sup> In March 2022, the first rejection decisions were issued due to insufficient income.

This whole timeline has been described in detail here because it clearly demonstrates the contradictory moves made by the Ministry of Interior within just a few months, and the ultimate backtracking which added the financial criteria in 'through the back door' as it were. Furthermore, the plethora of administrative acts caused confusion in the administration as to how and when these provisions will be implemented.

## POLITICAL CHOICE VS. THE GREEK REALITY

The minimum annual income requirement is a policy choice by the Ministry of Interior. This has been stated in meetings and public statements by officials from both the Ministry and the General Secretariat of Citizenship, and moreover it is a policy choice which they strenuously defend. In a recent interview, the Secretary General of Citizenship, Nassos Balerbas, stated that there are cases of candidates who have passed the exams and have been living in the country for years but have never made an income declaration. These applicants will not be naturalised, he stated, stressing that the requirement is a declaration that corresponds to the income of an unskilled worker, that is, the minimum amount.<sup>19</sup>

This statement underestimates the impact of the income criteria and attempts to give the impression that only extreme cases are rejected. However, the reality is very different. On the one hand, migrants who 'have never made an income declaration' are few, or rather non-existent, because most types of residence permits require an income declaration (regardless of the amount) in order to be renewed. Therefore, it is one thing for a person to be regular in their tax returns and quite another to prove specific levels of income through them. A declaration that would correspond to that of an unskilled worker, when translated into numbers, is not as low as presented: it starts at €7,500 per person per year, but can reach, for example, €10,500 for a person with a spouse and three children.<sup>20</sup>

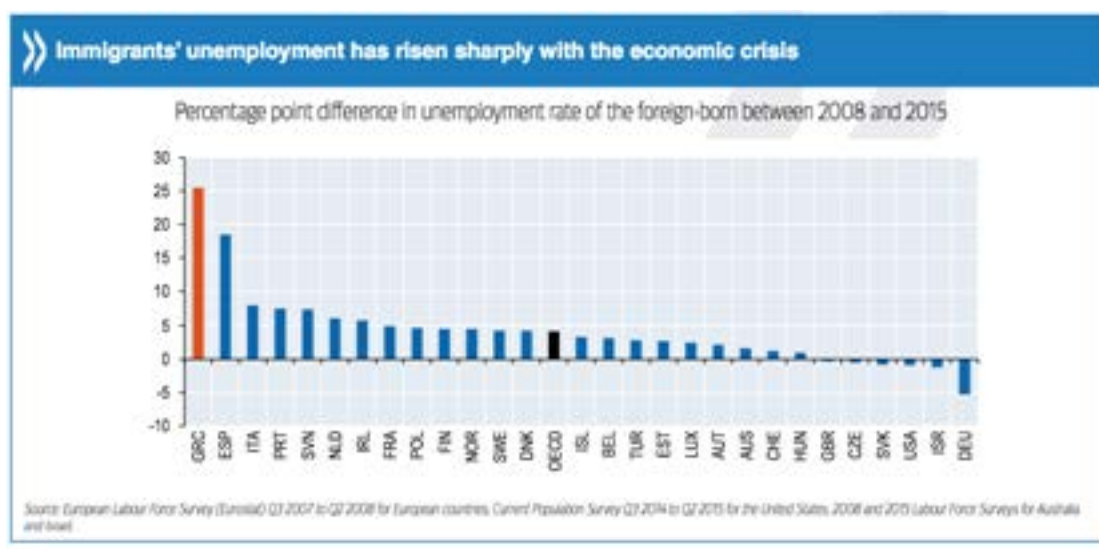
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<sup>18</sup> The first Ministerial Decision no. [29845](#) of 16.04.2021 was amended by decision no. [58050](#) of 04.08.2021 and subsequently by decision no. [96289](#) of 27.12.2021. These decisions were followed by the issuance of two circulars, [715/18.10.2021](#) and [81/04.02.2022](#).

<sup>19</sup> See [this article](#) published in *Kathimerini* on 08.11.2022.

<sup>20</sup> The amounts required for the years 2012 to 2018 are EUR 6,500 and EUR 9,100 respectively, as they are calculated on the basis of the minimum wage in force at that time.

In fact, since the proof of income required stretches back through the previous seven to twelve years, it is crucial to take into account the economic and labour reality of Greece during that period. First of all, the international financial crisis of 2008 and then the unprecedented economic crisis that our country experienced in the previous decade are an obvious factor. As a direct consequence of this, the unemployment rate as a percentage of the total population in Greece skyrocketed. These particularly high general rates were even higher for foreign unemployed people in our country. According to a statistical analysis by the Organisation for Economic Co-operation and Development, unemployment rates for migrants increased by 26% between 2008 and 2015, reaching 33% – compared to an increase of 17% for nationals – and reaching the first place in unemployment across Europe.<sup>21</sup>



[www.oecd.org/policy-briefs](http://www.oecd.org/policy-briefs)

Even after 2018, when unemployment rates started to fall, the unemployment rate among migrants remained particularly high; in the first quarter of 2019, the unemployment rate of foreigners reached 32.3% while that of Greeks was 18.3%, with the difference reaching 14 percentage points.<sup>22</sup> That difference has persisted to this day. Indicatively, in the last quarter of 2020,<sup>23</sup> the unemployment rate among foreigners was 28.2%, and that of Greeks was recorded at 15.5%, while in the second quarter of 2022 the rates were recorded at 20% and 15.5% respectively.<sup>24</sup>

<sup>21</sup> See [Greece Policy Brief](#), Organisation for Economic Co-operation and Development, March 2016.

<sup>22</sup> ELSTAT [Press Release Q1 2019](#)

<sup>23</sup> ELSTAT [Press Release Q4 2020](#)

<sup>24</sup> ELSTAT [Press Release Q2 2022](#)

This comparatively larger decline in the employment of foreigners in Greece during the crisis is related to the nature of their activities: the vast majority of migrants in Greece are employed in four sectors: construction, manufacturing, the service industry and agriculture, including of course the migrant women who work mostly in domestic work and cleaning and catering services.<sup>25</sup>

Unemployment is only one side of the coin. The other is **the phenomenon of undeclared and under-declared work**, which is a phenomenon that has a lasting impact on the workforce in general, not just on women workers and workers of migrant origin, who are the most vulnerable victims of labour exploitation, and particularly so when it comes to these categories of employment.

Finally, **the risk of poverty** for foreigners living in Greece has increased dramatically in recent years. In particular, for the 18-64 age group, the rate had risen to 64.3% in 2015,<sup>26</sup> falling to 62.9% in 2017,<sup>27</sup> and 52.5% in 2020.<sup>28</sup>

The numbers speak for themselves. Taking all the above data into account, the majority of the migrant population, either due to unemployment or undeclared work, is unable to prove sufficient annual incomes for all previous years of residence. This economic and social reality is completely ignored by the Ministry of Interior – or, knowing it very well, they have consciously attempted, through the income criteria, to place an insurmountable obstacle to naturalisation.

## NO EXCEPTIONS

Even if the introduction of the income criteria is a deliberate tightening up of the procedure, there could at least have been some exceptions or special arrangements for vulnerable groups or categories of the population who, for objective reasons, are unable to prove sufficient income.

Disabled people, for example, who cannot work, usually earn a living through the state benefits they receive. Depending on the type of disability, this starts at €313

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<sup>25</sup> Apostolos Kapsalis, "The Greek trade unions facing the challenge of contemporary migratory flows", («Τα ελληνικά συνδικάτα μπροστά στην πρόκληση των σύγχρονων μεταναστευτικών ροών»), Institute of Labour - Economic and Social Development Observatory, *Studies 47*, Athens 2020, p. 36.

<sup>26</sup> ELSTAT Press Release: [Poverty risk 2015](#)

<sup>27</sup> ELSTAT Press Release: [Poverty risk 2017](#)

<sup>28</sup> ELSTAT Press Release: [Poverty risk 2020](#)

per month, with most categories ranging from around €350 to up to €771 for very severe cases of quadriplegia and paraplegia. Initially no exemption was provided for disabled persons, although subsequently, with amendments to the administrative decisions, the minimum sufficient income required for these categories was reduced to €5,500. This was an improvement but it can still be considered insufficient because it leaves many categories of disabled people out; those whose benefit does not exceed €362 per month, for example, and thus earn €4,344 per year.

There is also no provision for people who were unemployed for reasons beyond their control, such as during the Covid-19 pandemic, as well as for categories of the population who cannot work for other reasons, such as young mothers and single parents with disabled children.

Second-generation persons who missed their chance to apply for citizenship using the specialised route that were forced to follow the naturalisation procedure also have an objective inability to prove minimum income. No account has been taken of the fact that in previous years these persons were minors, studying, or underpaid in their jobs due to their youth, and are not in a position to demonstrate sufficient income. This difficulty can reach the point of absolute impossibility, especially in the case of unaccompanied minors who have since come of age, because they are unable, unlike other young people, to submit previous family declarations and be considered as dependent persons.

Finally, there are many cases of foreigners who in some years show particularly high amounts and in others particularly low amounts, either because of unemployment or business activity which is characterised by change. For example, if in the last seven years a person has an income of more than €20,000 for 4 years, but the other three years below €5,000, he/she will not be granted Greek citizenship because he/she does not complete the required number of 5 years with sufficient income. In other words, there is also no possibility of offsetting high and low incomes between separate years, because each tax year is examined independently. Consequently, due to these extremely strict requirements for meeting the income criteria, even cases of people who have been demonstrably integrated into the economic life of the country – with the special circumstances that have characterised it in recent years – are excluded.

Proof of sufficient income is required not only for new applications but also for pending applications made under the old system, i.e., those filed before April 2021 under the old legislative framework. Most of the rejection decisions concern this type of application; that is, applications filed in 2016, 2017 or 2018; people who waited years to be interviewed by a Naturalisation Committee but, due to long delays on the part of the Administration, those whose turn never came. Those who decided to take exams under the new system, after passing them and presenting the PEGP to the relevant Directorate of Citizenship, were, a few months later, faced with an unpleasant and unexpected surprise: a rejection of their naturalisation application on the grounds that they did not meet the financial criteria. Most of them, in fact, were not even aware that the requirements had changed in the middle of the process.

The retroactive application of the economic criteria constitutes unfair administrative treatment and raises major issues of legal certainty, sound administration and confidence in the administration. At the heart of the principle of legitimate expectations, which is infringed here, is the reasonable belief of the citizen in dealing with the Administration that the stability of a certain legal situation allows him to expect its continuation in the medium and the long-term. The justification for failing to apply the principle of legitimate expectations is an overriding public interest. However, in the case of the substantive requirements for naturalisation, no such public interest has been invoked, nor is there any fundamental basis for arguing that this is the case. For this reason, the retroactive application of the new stricter income criteria violates the rule of law, in breach of the principles of good administration and the good faith of the governed.<sup>29</sup>

Therefore, if the economic and social reality of the country and the absence of exceptions for certain categories make the economic criteria unfair, then the fact that they were applied retroactively goes beyond the level of unfairness and raises serious questions about the legality of the procedure.

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<sup>29</sup> As explored further in the brochure prepared by the Hellenic League for Human Rights and Generation 2.0 RED in the framework of the project "Citizenship in Practice": [Recommendations on the Substantive Conditions for Naturalisation](#), p. 56.

Under the new system, the rejection of naturalisation applications is usually on the basis of a lack of sufficient income. The first figures on decisions issued under the new system were made public as part of parliamentary scrutiny in June 2022. 1,206 naturalisation decisions have been issued under the new system, 787 (65%) of which are positive and 419 (35%), negative. These percentages may be reversed when the additional 2,482 decisions from files in which supporting documents and final examination are pending are incorporated. A particularly worrying indication of the stringency of the economic criteria is the data from the Athens Citizenship Directorate, which has so far issued 70 positive and 121 negative decisions, while 570 applications are still pending (see figure on p. 47). This means that the percentage of rejected applications exceeds 63% for third country nationals residing within the Municipality of Athens. A different picture is presented by the data of the Directorate of South Athens, Piraeus and the Islands, where the number of positive decisions reached 136 and the number of negative decisions reached 49. In Thessaloniki, on the other hand, there were 89 positive decisions and 72 negative ones.

## 2.2 DOCUMENTING SOCIAL INCLUSION

In the Ministerial Decision, the evidence of social inclusion required is indicative and not restrictive, as was the case in the past. In simple terms, one is not obliged to prove all or even most of the evidence, but what you provide strengthens your case. Evidence of social inclusion includes continuous residence in the country, family ties with a Greek citizen, attendance at a Greek school, vocational training and participation in voluntary activities and civil society events.<sup>30</sup>

However, the April 2021 Ministerial Decision includes problematic wording referring to family ties with a Greek citizen, requiring the marriage to a Greek citizen to be with a Greek citizen by birth, excluding, in other words, other ways of acquiring Greek citizenship. This is a provision that possibly goes beyond the constitutional limits.<sup>31</sup> Nowhere in the Constitution is there a distinction between Greek citizens who are born and those who are naturalised. How, therefore, can an administrative act introduce such a distinction?

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<sup>30</sup> See detailed list of inclusion criteria in Annex 1.

<sup>31</sup> [See Press Release](#) by the Hellenic League for Human Rights published on 07.05.2021.

## 2.3 ACTIVE AND MEANINGFUL PARTICIPATION IN THE POLITICAL LIFE OF THE COUNTRY

One of the substantive conditions for naturalisation which has been in force since 2010 is that the foreigner must be able to participate actively in the political life of the country and respect the fundamental principles that govern it. A logical requirement, one might think, when it comes to the acquisition of citizenship. And yet, this was removed from the requirements in the 2021 legislation.

The removal of this requirement raises questions as to what really matters to the state in determining which persons are entitled to acquire Greek citizenship. Are income and family ties with Greeks now the main factors in determining whether or not the applicant should be granted citizenship, rather than whether the applicants will ultimately be active citizens, capable of exercising their political duties under the Constitution? As the Hellenic League for Human Rights has pointed out, *"the abolition of this requirement indicates in the final analysis that the government considers political education an irrelevant issue for a citizen"*.<sup>32</sup>

The fact that the PEGP examinations contain a category to test candidates' knowledge of the constitution and the functioning of political institutions constitutes a further reason to reinstate this requirement. The retention of this wording in the legislation has symbolic value, sending a message about what criteria are of value to the state in the acquisition of Greek citizenship. The potential for active and meaningful participation in the political life of the country should certainly be one of these criteria.

## 2.4 ABOLITION OF THE ORAL INTERVIEW

Another setback in the reform process was the initial retention of the interview before the Naturalisation Committee and then its abolition in December 2021. When the Ministry of Interior decided in 2020 to introduce the written examinations with the aim of homogenising and speeding up the naturalisation process, one wondered why the oral interview stage was retained to assess the evidence of economic and social integration and the potential to participate in the political life of the country.

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<sup>32</sup> From the Hellenic League for Human Rights' [Press Release](#) 15.12.2021.

As Generation 2.0 RED had commented during the public consultation for the bill, *"the retention of the interview stage for applicants and the provision for it to be conducted by two employees of the General Secretariat of Citizenship raises concerns about the overall procedure. Firstly, given that the number of officials is not an odd number, what will happen in cases of disagreement of whether or not to accept the naturalisation application? Secondly, the retention of the oral interview to assess the substantive requirements is in apparent contradiction to the government's plan to replace it with written examinations in order to ensure transparency, impartiality and homogeneity in the questions posed to candidates. Furthermore, no one can ultimately guarantee the speed of the process, since these provisions may result in the same delays, or even add further delays rather than reducing the overall time required to complete the naturalisation process, as promised by those responsible for drafting the bill"*.<sup>33</sup>

When the bill was passed by Parliament, the two-member Committee had become a three-member Committee, and a year later, in October 2021, after the necessary administrative acts were issued, the first interviews were conducted. As per the procedure, the Citizenship Directorates had already requested supporting documents for the economic and social criteria, so they already knew which individuals met the criteria, and which did not. There was considerable concern and confusion as to whether or not people who did not have sufficient income to meet the financial criteria should be invited for an interview, because their application would be rejected anyway. Thus, the services decided in the first instance to invite people who met the financial criteria.

These interviews were quite short, about half an hour, since the evidence provided of economic and social integration had been examined beforehand by the Committees. The questions asked by the Committees were mainly related to testing basic knowledge of the political life of the country. From the testimonies of interviewees, following are some of the questions they were posed, for illustrative purposes: *Who is the President of the Republic? Who is the Prime Minister? Who is the Minister of Health? Who is the General Secretary of the Communist Party of Greece? Who is the General Secretary of the Greek Solution?*<sup>34</sup> *Name countries that are allies of Greece. Name countries that are adversaries of Greece. What are the responsibilities of the Municipality? What services does the registry office provide? What is going on in the political news at the moment? (at the time the head of a key political party had just passed away and elections were underway for a new party president).*

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<sup>33</sup> From Generation 2.0 RED's [Press Release 10.09.2020](#)

<sup>34</sup> A political party.



These interviews, however, were abandoned after less than two months because in practice this procedure was now redundant. The PEGP examinations and the disqualifying of those who didn't meet the income criteria rendered the interviews superfluous, and so the Administration abolished them by legislative decree in December 2021. Henceforth, applicants are only invited to be interviewed by the three-member committees in the case of serious doubts about whether or not a candidate meets the economic or social requirements.

Another paradox encountered as a result of the continuous modifications to the procedure was the following: in some interviews the applicants, while they had passed the PEGP exams and correctly answered particularly demanding questions about the political institutions of the country, could not answer the basic questions posed by the Committee, such as who the Prime Minister of the country is. Thus, a few applications would have been rejected at this stage, even if they met the financial criteria. These were "frozen" as soon as the legislation was changed again as officials did not know how to handle them in light of the new amendment to the procedure. In the end, these files were reviewed on the basis of the evidence of economic and social inclusion that had been provided and not in terms of the answers given in the interview, as this was no longer applicable.

This legislative journey demonstrates the sloppy way in which parts of the new naturalisation system were set up. It caused confusion in the administration during its implementation, and to the officials being confronted with continuous changes to the procedure. It also inconvenienced applicants, causing delays in issuing decisions and soul-crushing feelings of instability, with some applicants completing the interview stage ultimately completely unnecessarily.

## **2.5 REFUGEES: CHANGES TO THE REQUIRED YEARS OF LAWFUL RESIDENCE**

Previous sections have assessed the significant changes that have taken place to the substantive conditions required for naturalisation. There have been no changes to the formal conditions worth mentioning, except one. At the beginning of 2020, the required years of prior lawful residence for recognised refugees to be eligible to apply for naturalisation were increased from 3 years to 7 years, which is the norm for other types of long-stay permits. Refugee status, being one of the most powerful residence statuses, is usually subject to more favourable legal treatment because of the special status of the refugee and the high level of protection he/she enjoys under the Geneva

Convention. This is why a three-year residence period was previously established as a standard requirement for this category. The 2020 amendment was made on the grounds that 3 years is too short a time to consider a person sufficiently integrated into Greek society. However, it persists as a sufficient time period in other categories, such as for EU citizens.

This amendment does not make much sense in practice, as a person with refugee status is only able to apply for naturalisation when he or she is sufficiently integrated anyway, since the process requires good knowledge of the Greek language and the ability to pass the PEGP exam. Therefore, those who are not sufficiently integrated after 3 years of lawful residence would not be able to successfully apply for naturalisation in any case.

Rather, this increase in the required years of lawful residence for refugees was more of a symbolic gesture; part of the general message of deterrence that the government wanted to portray in refugee and immigration policy through a series of provisions introduced at the time.

## **2.6 ABOLITION OF THE APPEAL PROCESS BEFORE THE CITIZENSHIP COUNCIL**

The last point that we will address in this section is that of the final stage of the procedure; the ability to appeal rejected naturalisation applications. Until October 2020, applicants could lodge appeals with the Citizenship Council, which constituted an initial appeal at the administrative level, to a body of the Ministry of Interior. This possibility has now been abolished, with the result that candidates who have been rejected and wish to appeal the decision must do so in court by filing an application for an annulment of the decision to the Administrative Court of Appeal. In this way, however, candidates lose any right of appeal they may have had outside the judicial process. This is crucial, particularly in cases of rejection on financial grounds – which are the most common – since legal appeals involve a high financial burden for candidates and years of waiting for their case to be heard.<sup>35</sup>

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<sup>35</sup> See the brochure prepared by the Hellenic League for Human Rights and Generation 2.0 RED in the framework of the project "Citizenship in Practice", Recommendations on the Substantive Conditions for Naturalisation, p. 57 (available only in Greek).

Matters pertaining to citizenship fall under the jurisdiction of the Ministry of Interior and specifically the General Secretariat of Citizenship. Central and regional directorates are organised within the General Secretariat. The General Directorate of Citizenship was established in 2020, with the operational objective of supervising the existing services in correctly applying citizenship legislation, to speed up the processing of cases and to ensure the smooth and efficient operation of all the organisational units under the General Directorate. Within the General Directorate is the Central Directorate of Citizenship and under it the Regional Directorates of Citizenship throughout the country.<sup>36</sup>

The inadequate staffing of citizenship services is a persistent issue,<sup>37</sup> which has a direct impact on the processing rate of applications. There is not enough staff dealing with naturalisation in the Citizenship Directorates, and the Ministry's efforts to increase staff levels in these services have not been successful.

According to data released by Parliament,<sup>38</sup> in June 2022 a total of 108 employees were working in the Citizenship Directorates nationwide, dealing with naturalisation applications. In the Athens department, which has the highest volume of applications, there are only 3 persons; in the Central Sector and West Attica 4; in the North Sector and East Attica 5; in the South Sector, Piraeus and Islands 9. In Thessaloniki, the Central Macedonia department employs 17 people, while the Directorate of Citizenship of the Peloponnese, Western Greece and Ionian Islands employs 20 people.

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<sup>36</sup> See Annex 3 for the Organogram.

<sup>37</sup> See the "Report on the Citizenship Directorates of the Ministry of Interior" by Generation 2.0 RED (July 2020).

<sup>38</sup> You can see the exact number of officials dealing with the naturalisation of foreigners, as published in the [02-06-2022 answer](#) by the Minister of Interior to [Question No. 4251/29-03-2022](#).

# 4

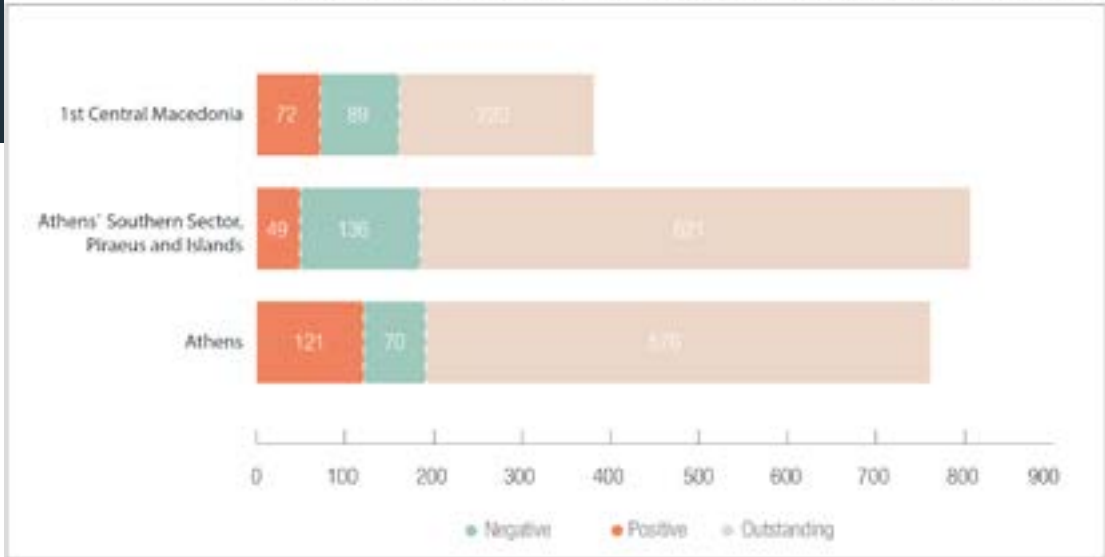
## PROCESSING RATE OF APPLICATIONS

The Code of Greek Citizenship provides that all stages of the naturalisation process must be completed within 12 months of the application and, in the event of delay, the Administration must provide written notification of the reasons for exceeding the deadline. The reality, however, tends to be very different. In the two major urban centres of Athens and Thessaloniki, the average waiting time for naturalisation applications to be completed was over 6 years until April 2021, when the new procedure came into force.

Because such a backlog has built up over the years, the pace of the processing of applications has been particularly slow. In 2019, there were 28,020 pending naturalisation applications, whilst in 2021, according to a press release from the Ministry of Interior, there were 32,943. This huge number includes all applications filed before 31/03/2021 under the old naturalisation procedure.

Under the new system, for the assessment of both new applications and for all applications lodged under the old procedure to proceed, the applicant must present a PEGP or an exemption from the examinations due to participation in the Greek education system. Based on data published by Parliament in June 2022, applications made under the new system are estimated at 3,688 nationwide, of which 2,482 are still pending. The regions with the highest volume of pending applications are Athens, with 570, and South Sector, Piraeus and Islands with 670.

### PROGRESS TRACKING OF APPLICATIONS IN 3 BIGGEST DIRECTORATES OF CITIZENSHIP



Therefore, not even 1/10 of the pending applications accumulated under the old system progressed under the new procedure; by summer 2022, about 30,000 old pending applications were still stuck in the system. But will those who applied under the old system go through the process of passing the exam and presenting their PEGP certificate?

# III

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## EVALUATION OF ADMINISTRATIVE CHANGES TO THE SECOND-GENERATION CITIZENSHIP ROUTE

Unlike the naturalisation procedure, which has undergone drastic changes over the last two years, the procedure for acquiring citizenship by birth and/or education has not undergone any significant changes since its introduction in 2015. This in itself is interesting, as in 2010, when the acquisition of citizenship for children born and raised in Greece was first legislated into existence, it was highly controversial, both at the parliamentary and judicial level. Nevertheless, the acquisition of citizenship through the second-generation route has proved remarkably resilient, especially after the changes made in 2015, and the requirements and procedure have remained largely the same. In 2020 an administrative change was made in the designation of the department examining these applications, which for a long time slowed down the processing of pending applications.

# 1

## CENTRAL ADMINISTRATIVE ORGANISATION AND STAFFING OF THE SERVICES

As detailed in the first chapter, a highly significant administrative change took place in October 2020. Two new Regional Directorates of Citizenship were established in Attica and Central Macedonia (B), which took over full responsibility for the examination of applications for naturalisation made on the basis of birth/education (Article 1A of the Code) and on the basis of education (Article 1B of the Code) within the limits of their territorial jurisdiction.

In this way, the former competent Directorates automatically ceased to have jurisdiction over pending applications made on these bases from 12 October 2020 onwards, when Law 4735 came into force, and all files with pending applications were transferred to the new Regional Directorates.

Given that the establishment and staffing of new public services are not tasks that are completed very quickly, this transfer of responsibility created an unprecedented administrative gap in the processing of second-generation citizenship applications in the two major urban centres of the country, Athens and Thessaloniki. The process of staffing the services took months. In Athens, the Regional Directorate of Attica started operating only in September 2021. The transfer of pending files from the former competent services was also excessively delayed and was completed only in the first months of 2022. The transfer process proved to be much more time-consuming than envisaged, as the electronic file transfer system could not be

employed, as had been planned. Thus, it was necessary to transfer the paper files and then for the new service to organise them.

So, for almost a whole year, from October 2020 to September 2021, the processing of second-generation files was suspended, as the former services were legally incompetent and the new services were not yet ready to operate. There was also a lot of confusion for people who wished to file applications during this period, as they didn't know which service to send them to, until the central administration decided that new applications should continue to be sent by post to the existing services. The new Attica Directorate finally started accepting applications from residents of the Municipality of Athens from August 2021 and from the rest of Attica from the end of September 2021.

Today, the two new services are operational and staffed with 15 persons in Attica and 17 persons in Central Macedonia. In the rest of the territory, where no administrative change has taken place, the examination of applications for second-generation citizenship continues to be carried out by the Directorates of Citizenship of each Region.<sup>39</sup>

## 2

## PROCESSING RATE OF APPLICATIONS

The purpose for which the two new Regional Directorates of Citizenship were created was to reduce the burden of applications that had been accumulated in the existing Directorates, which were responsible for all applications for citizenship.<sup>40</sup> According to the Ministry of Interior, the establishment of the two new departments that would deal exclusively with the second-generation process would reduce the waiting time for processing applications. However, the length of time it took to get the new services up and running, combined with the failure to provide a transitional solution during this time, ultimately produced the opposite result.<sup>41</sup> Indicatively, in October 2020, the

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<sup>39</sup> See Annex 3 for the Organogram.

<sup>40</sup> Second generation applications and all other applications for naturalisation.

<sup>41</sup> See more in the [press release](#) published by Generation 2.0 RED on 22.12.2020.



waiting time for the issuance of citizenship decisions in Athens averaged 3 years, while by the end of 2022 it has now exceeded 4 years. This wait hugely exceeds the time limit set in the Citizenship Code, which stipulates that the examination of applications must be completed within 6 months.

According to data published by Parliament, the total number of applications for second generation citizenship filed between 01/09/2015 and 31/03/2022 is 116,500 (50,495 applications under Article 1A, on the basis of birth and education and 66,005 under Article 1B, on the basis of education).<sup>42</sup> Currently, 18,822 are estimated to be pending nationwide. Of these, 8,148 concern applications under Article 1A and 10,674 under Article 1B. Looking at the official data on pending applications, Attica has seen an increase, with 1,000 more pending applications in February 2022 compared to July 2021, while in Thessaloniki the number of pending applications remains stable.

#### APPLICATIONS FOR SECOND GENERATION CITIZENSHIP – SEPTEMBER 2015-MARCH 2022



<sup>42</sup> The data can be found in the [response of the Minister of the Interior dated 02-06-2022 to Question No. 4251/29-03-2022](#) (in Greek).

In contrast to the extreme delays observed in the two major urban centres, the directorates in the rest of Greece now have a particularly fast processing rate<sup>43</sup> as they issue decisions on applications in an average of 2-3 months, while in some cases the waiting time is less than a month. This is undoubtedly a positive step for children and young people of migrant origin residing in the other regions of the country. However, it also creates a two-speed phenomenon in the granting of citizenship to second-generation candidates. The example of a family residing in the Western Sector of Attica is typical: of the three brothers and sisters, two filed for citizenship with the relevant Directorate of Attica at the end of 2018, while one sister, who left to study in Crete, filed there in 2020. The latter received Greek citizenship a year ago, while her brothers are still waiting.

All of these delays, aside from being outside the legal limit, also have a serious impact on the lives of children and young people of migrant origin. How many more people will lose opportunities to study abroad, scholarships to universities in Greece or abroad, public sector jobs, or the opportunity to participate in national sports teams because the state does not deliver their citizenship decisions on time, even though they have documented their right to become Greek citizens, in some cases years ago?

All the actions and achievements that prove that these people are socially integrated into Greek society lead to the painful frustration of a long wait, constituting a blow both to the applicants and to society as a whole.

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<sup>43</sup> This observation follows from a study of the decisions published in the Official Gazette in the last quarter of 2022.

### 3.1 ACCESS TO GREEK CITIZENSHIP FOR CHILDREN WITH DISABILITIES

The April 2019 legislative change provided that the children of foreigners with a certified disability of over 80%, who qualify for second-generation citizenship but are unable, due to their disability, to meet the education requirements, can submit in its place certificates of specialised care services and psychosocial or therapeutic rehabilitation received for a corresponding period of time. In February 2020, however, before this provision could be implemented, an attempt was made to repeal it. According to the explanatory memorandum accompanying the bill, specialised care services and psychosocial or therapeutic rehabilitation cannot be considered as equal to permanent and stable attendance in the education system and are therefore incompatible with the content of the law for which the basic condition for naturalisation is the concept of continuous and successful attendance in the education system. In a joint press release at the time, the National Confederation of Persons with Disabilities, the Hellenic League for Human Rights and Generation 2.0 RED had stressed that the repeal of article 31 of law 4604/2019, is in complete contradiction of Greece's commitments to ratify and uphold the United Nations Convention on the Rights of Persons with Disabilities as set out in law 4074/2012, and in particular articles 7, 9, 11 and 18.

In response to these reactions, the government did not repeal the 2019 provision in the end, but instead withdrew every act issued under the provision.<sup>44</sup> In effect, it withdrew the Ministerial Decision that had already been issued detailing which certificates were necessary and laying down the application procedure. Despite promises that a new, more detailed Joint Ministerial Decision would be issued soon, three years later no new administrative act has been published and, therefore, the legislative possibility of granting citizenship to severely disabled children has become empty in practice.

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<sup>44</sup> See more in the [press release](#) published by Generation 2.0 RED on 05.06.2020.

Taking all this together, it seems that the Ministry of Interior, then, only pretended to withdraw the abolition of the provision simply to appease the criticism it had received, as it eventually managed to render it ineffective in any case by not issuing a new Ministerial Decision on how it should be implemented.

## 3.2 SUSPENSION OR REJECTION OF APPLICATIONS DUE TO CRIMINAL IMPEDIMENTS

A final issue worth mentioning is the amendments made by Law 4915/2022 regarding the criminal impediments that suspend or reject applications for citizenship applications made based on attendance at a Greek school.

Applications could already be rejected for reasons of public order and national security, and another category has now been added, which is if a young person has been sentenced to juvenile detention. Furthermore, having been prosecuted for a crime is now sufficient grounds for the rejection of a naturalisation application, without the need for the trial to be pending. These two provisions are in line with a general trend of tightening up policy around public order, which appears disproportionate in the case of restricting access to citizenship for children and young people born or raised in the country. Moreover, the suspension of applications for the reason of criminal prosecution, especially in the case of minors, **nullifies the presumption of innocence.**

**IV**



**PROPOSALS**

Following the evaluation of the naturalisation procedures of foreign nationals and second-generation citizenship in the previous chapters, this chapter will present proposals for improving the issues outlined above, and the citizenship process in general. These proposals constitute the final collection and synthesis of observations and recommendations that have been developed throughout the project "Citizenship in Practice" and examined in the Reports on Recording and Highlighting Issues in the Administrative Process; the Report on Best Practice in European Countries in the Naturalisation Process; Recommendations on the Substantive Conditions for Naturalisation; as well as workshops with public administration officials involved in naturalisation procedures.<sup>45</sup> The proposals are divided into three sections: general proposals for modernising procedures, proposals on naturalisation and proposals on second-generation citizenship.

# 1

## PROPOSALS FOR THE MODERNISATION OF CITIZENSHIP PROCEDURES

### FAIR AND TRANSPARENT PROCEDURES

- ◆ Compliance with the deadlines provided for in the Code of Greek Citizenship for the examination of citizenship applications: 1 year for naturalization and 6 months for second generation citizenship. These deadlines must be fully respected, with sanctions to be imposed on the Administration in the event of failure to do so, unless adequate, written justification is provided for the delays in individual cases.
- ◆ The provision of the possibility for the administrative services to exercise discretion in cases where it is objectively impossible to provide certain

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<sup>45</sup> During the project, 3 workshops were held in Athens and Thessaloniki on the following topic: "The role of public officials in the acquisition of citizenship" and were addressed more specifically to employees of the Ministry of Interior and to teachers. The workshops enabled participants to exchange concerns and good practices in the performance of their duties. More information available [here \(in Greek\)](#).

supporting documents, such as a birth certificate from the country of origin (as there are countries that do not issue or refuse to issue such certificates).

- ◆ The use of the provision for honorary naturalisation should be exceptional, as intended in the spirit of the law, and not abused as a means of circumventing in certain cases the delays and difficulties of the regular naturalisation procedure.
- ◆ The regular publication of statistics and figures on citizenship procedures including total applications, pending applications by service and the participation levels and results of the PEGP examinations. The publication of reports with figures should be carried out on a monthly basis by the Ministry of Interior and at the end of each year the statistics should be presented with comparative data in tables and charts.

## COMMUNICATING THE PROCEDURES EFFECTIVELY TO THE PUBLIC

- ◆ The website of the [General Secretariat of Citizenship of the Ministry of Interior](#) should be redesigned to make it more user friendly and interactive. The information posted needs to be simplified, categorised and enriched. In addition, all the steps of the procedures should be explained interactively with the list of the necessary supporting documents. Sample applications for the various routes for acquiring citizenship should also be posted.
- ◆ Improve the accessibility of the website and its services from any type of electronic device, including tablets and mobile phones, as well as helping people who are objectively unable to access the online services, through communicating the Item Bank more effectively and by making the material more widely available.
- ◆ Re-opening the Directorate's helpdesk to provide assistance and information to those who need it.
- ◆ The responsibility of keeping applicants informed should be assigned to an official(s) in each Regional Directorate and each Directorate of Citizenship. This should include applicants being able to contact this person to obtain immediate information by e-mail, in person or by telephone. Applicants should also be kept informed about the progress of their file and contacted with other questions or clarifications in relation to the required supporting documents. Any important notices about the procedure should be posted in each regional

office. In addition, paper brochures should be provided explaining simply and clearly all the steps of the procedures.

- ◆ An information campaign should be initiated using video and other media, using celebrities of migrant origin to explain the different procedures for obtaining citizenship.
- ◆ Social media should be used to disseminate information and promote naturalisation and second-generation citizenship procedures.
- ◆ A guide in printed form should be produced, entitled *Simplified Instructions for the Acquisition of Greek Citizenship* and it should be distributed to Immigrant Integration Centres, Civil Society organisations, migrant associations etc. in order to disseminate the information more widely.
- ◆ Awareness-raising campaigns should be conducted, targeting specific groups of citizens, such as Roma, or the parents of stateless pupils. Cooperation between the Ministries of Interior, Immigration & Asylum and Education & Religious Affairs is recommended in order to inform teachers and school principals about the necessity for children of migrant origin to attend secondary education for 6 years, in order to have access to citizenship by this route.
- ◆ Training teachers to enable them to provide students with basic information on access to lawful residence and citizenship.
- ◆ Specialised civil society organisations should be involved in the procedure through formal cooperation with the state in order to provide information services to applicants as well as support in collecting the necessary evidence and checking the application before submission.
- ◆ Public information and awareness campaigns (e.g. posters in relevant public services) on the benefits of migrant naturalisation in relevant public services, in order to instil an inclusive mentality not only in public institutions but also in society in general.
- ◆ Establishment of citizenship granting ceremonies at local levels with the participation of state officials, local personalities and students in the context of school educational activities, in order to consolidate a positive attitude towards citizenship and naturalisation in particular.



## STAFFING OF THE SERVICES AND DIGITALISATION

- ◆ Creation of more positions in the Regional Directorates and Citizenship Directorates around the country which are currently understaffed, such as the Athens Citizenship Directorate. Mobility between services should also be increased with incentives provided to encourage staff to move to positions in understaffed services.
- ◆ The possibility to submit applications online should be created with an easy-to-use online application process in order to avoid the need to submit paper documents by post or in person, although the possibility to submit applications by post or in person should also be retained for those persons who, for whatever reason, are unable to use digital means.
- ◆ Electronic systems connecting all public administration services should be upgraded so that certificates or other up to date information on insurance, taxation and all information relevant to naturalisation applications can be obtained directly from the competent services.
- ◆ The digital sharing of all files pertaining to naturalisation should be undertaken between all the Directorates dealing with citizenship issues so that information and documents can be shared and transferred between services easily and quickly.

## 2

# PROPOSALS PERTAINING TO NATURALISATION

## 2.1 PEGP EXAMINATIONS

### INTEGRATION POLICY AND PREPARATION

- ◆ Promotion of inclusion through the active participation of third country citizens in local cultural events and local communities more generally, in order to bring those with a migrant background into more direct contact with Greek culture, with current issues and to achieve a sense of belonging to Greek society.
- ◆ Establishment of adult Greek language courses and preparation for the PEGP as an integral part of the national integration strategy. Local authorities should also be actively involved through the Centres for Integration of Migrants and Refugees.
- ◆ There should be coordinated and sustained high quality, free preparatory courses for the naturalisation examination either by public institutions or specialised civil society organisations with experience in the issue. The courses should be held all over Greece and well promoted and communicated to the public.
- ◆ Appropriate preparation and support for candidates with disabilities or learning difficulties, including ensuring their ability to access and participate in every stage of the process.

### THE SCIENTIFIC COMMITTEE

- ◆ The composition of the Scientific Committee should be adjusted to include more members specialised in the fields of citizenship and integration policy in designing and operating the Item Bank. In addition to the existing members, the Scientific Committee should also include:

- A member who participated in the former Naturalisation Committees (higher education staff or member of the National Human Rights Commission), in order to incorporate the experience of the oral interviews conducted in the past and the main issues that been encountered.
- A senior official from the Directorates of Citizenship (e.g. a member of the Directorate General or the regional directorates for citizenship), in order to contribute their specialised knowledge and experience of the profile of the target audience of the examination,
- A teacher specialised in intercultural education and the teaching of Greek as a second language, to assist in the formulation of questions and answers,
- A social or political scientist to contribute their expertise and to ensure that the purpose of the examination, which is to ascertain the degree of the person's integration into society, is fulfilled in the design of the Item Bank.
- The establishment of a consultative role for migrant communities and civil society organisations specialised in citizenship issues.
- The establishment of a consultative role for organisations specialising in disability issues and special education teachers.

## THE ITEM BANK

- ◆ The questions in the Item Bank should be reconfigured so that they do not resemble higher education entrance exams and do not encourage simple rote learning. As we have pointed out many times – and the international literature on naturalisation converges on this – the acquisition of citizenship is not an encyclopaedic issue. The demanding knowledge questions should be replaced by more simple, comprehensible questions that explore the degree of integration and not the level of encyclopaedic knowledge.
- ◆ Questions should be tailored more closely to the experience and knowledge of the candidates, taking into account varying profiles. In particular, it would

be advisable to limit the questions relating to monuments, archaeological sites, details of historical figures or political institutions. The questions should rather be linked to the fuller experience of Greek everyday life, social habits, political current affairs and contemporary culture. Topics for the examination could therefore be enriched with information that is widely available through popular media. Such questions could include, for example, the following:

- *Which Greek television programmes do you watch?*
- *Name five Greek singers. Name a Greek song that you particularly like, and explain why.*
- *Tell us about a cultural event that took place in your municipality that you have participated in.*
- *Briefly describe the financial crisis of 2010 and what its main effects were, both in general, and what effects it had on your own life*
- *Who were the Prime Ministers of Greece during the last decade?*
- *Name the leaders of the five leading political parties*

- ◆ Finally, the use of more visual media could make studying the material more relaxed and interactive and facilitate understanding.

## THE PEGP EXAMINATION PROCEDURES

- ◆ The exemption from the examination requirement for the PEGP should respond to the different needs of the migrant population, taking into account all categories and specific cases. The criteria justifying the exemption should be provided in a detailed and clear manner, and be easily comprehensible.
- ◆ Reduction of the time period of required attendance at a Greek school from six years of secondary education to three to qualify for exemption from the PEGP.
- ◆ Exemption from the language test for holders of a language qualification of at least B1 level, officially certified by recognised bodies.

- ◆ Broadening the arrangements for which groups can be orally examined. Not all persons can or should be tested in writing for citizenship by naturalisation, and oral examinations should be offered to:
  - Those over 55, not just those over 62.
  - Those with a mental disability over 67% should be included in the exceptions to the written test and given oral examinations, as is the case for those with an equivalent level of physical disability.
  - Illiterate persons should be offered an alternative to the written examinations.
- ◆ The oral examination offered to categories exempted from the written examination should also be simplified, in particular as concerns the reading and comprehension section of the language examination).
- ◆ Teachers with experience in special needs education should be included in the list of assessors/evaluators of the examination.
- ◆ Provision of the possibility of an administrative appeal against the results of examinations.

## 2.2 SUBSTANTIVE AND FORMAL REQUIREMENTS

### EVIDENCE OF FINANCIAL INCLUSION

- ◆ Abolish the income criteria, which introduce an insuperable obstacle, effectively denying the majority of third country nationals the option of naturalisation. The naturalisation of people with strong ties to the country should in no way be dependent on economic criteria involving minimum income amounts.
- ◆ As long as the income criteria are in force some exceptions should be provided, such as:

- For those applications filed under the old system. In other words, the retroactivity of the financial criteria should be removed. For a state to require income criteria, and retroactively at that, is not only discriminatory against the socially disadvantaged but also violates fundamental constitutional principles of the rule of law.
- Clear and detailed exception criteria should take into account involuntary unemployment and long-term absence from work due to illness or accidents at work. Other factors preventing access to employment should also be included in the assessment, such as maternity and child-rearing, care of elderly relatives, employment in a family business, youth and education. To this end, provisions should be made for the possibility of reducing the annual income requirement for those who have received unemployment allowance for one year, and in the cases of applicants with disabilities which prevent them from working, the total income required should be calculated on the basis of the sum of the corresponding state benefit per year. Finally, special provisions should be made for young people who are objectively unable to prove sufficient income for previous years due to their youth (for those who have just reached the age of majority).
- There should also be a recognition of the impact of the economic reality brought about by the Covid-19 pandemic by excluding the years of the pandemic from the income requirements due to the economic hardship endured by a large part of the population at the time.

## EVIDENCE OF FINANCIAL INCLUSION

- ◆ Abolition of the new clause stating that marriage must be to a Greek citizen by birth, which constitutes an unconstitutional discrimination between Greek citizens.

## ACTIVE AND MEANINGFUL PARTICIPATION IN THE POLITICAL LIFE OF THE COUNTRY

- ◆ Restoration of the requirement of active and meaningful participation in the political life of the country, as it is highly symbolic in the concept of citizenship itself for if anything testifies to a person's social inclusion in the political community that surrounds them, it is this ability to actively and meaningfully participate.

## YEARS OF LAWFUL RESIDENCE REQUIRED

- ◆ Reduction of the number of years of previous lawful residence required: from 7 years to 5 years for long-term residence permits (e.g., long-term, 10-year, Greek family member, second generation, refugees), and from 12 years to 10 years for other types of residence permits

## APPEALS BEFORE THE CITIZENSHIP COUNCIL

- ◆ Reinstatement of the ability to appeal negative decisions before the Citizenship Council as a first stage of administrative appeal before resorting to legal means.

# 3

## PROPOSALS ON SECOND-GENERATION CITIZENSHIP

### LEGISLATIVE FRAMEWORK

- ◆ The legislative framework concerning the acquisition of citizenship of children born in Greece and enrolled in the first grade of primary school (article 1A of the Citizenship Code) should be amended in order to simplify the very strict conditions regarding the legal status of the parents. It could, for example, cease to be a prerequisite that one of the parents should have a long-term residence permit (long-term, ten-year, etc.) at the time of submission of the application, as a large proportion of third-country nationals hold 'dependent work' residence permits despite long years of lawful residence in the country.

### ADMINISTRATIVE AMENDMENTS

- ◆ A strategy should be developed for the speedy examination of the thousands of pending applications that have accumulated in the new Regional Directorates of Attica and Central Macedonia. One solution might be to staff the services with additional temporary positions with the specific task of examining pend-

ing applications. These employees, once properly trained, could contribute to the rapid closure of these pending cases.

- ◆ The supporting documents required to accompany applications should be further simplified. The process of acquiring citizenship for the second generation is a declaration/ application to the administration and should not result in a complex and bureaucratic procedure, such as in the case of the naturalisation of adult foreign nationals.

## CHILDREN WITH DISABILITIES

- ◆ Issuance of the necessary Ministerial Decision and immediate administrative action to include children and young people with severe disabilities who cannot prove the requisite number of years of successful attendance at a Greek school in order to qualify for citizenship.
- ◆ This right should also be provided retroactively to those persons who have missed the deadline for filing an application for second generation citizenship due to exceeding the age limit. That is, persons who would have been entitled to exercise this right during the years when the relevant legislative provision was not applied, from 2019 to the present.

## CRIMINAL IMPEDIMENTS

- ◆ The stricter regulations preventing access to citizenship, namely those pertaining to juvenile detention and the addition of criminal prosecution as a barrier in itself, should be repealed.





The procedures for acquiring Greek citizenship have been defined by excessive delays mainly due to understaffing and the bureaucratic rigidity and complexity displayed by the Administration.

The new legislation, which was intended to resolve these issues, has ended up creating new obstacles even more serious than the existing ones. The examination procedure for the PEGP, does promote homogeneity and transparency but, unfortunately, its benefits end there. The introduction of income criteria – which have been applied retroactively – flagrantly ignore the economic reality of the country over the last decade and more, and now stand as an insurmountable barrier for the majority of third-country nationals; fully integrated people who have lived here all their lives are now receiving rejections of their citizenship applications.

Regarding the procedure for granting second-generation citizenship, the Ministry of Interior's initiative to set up two new Regional Directorates of Citizenship which would deal exclusively with this category of applications in Attica and Central Macedonia was obviously a step in the right direction, but it was unfortunately implemented in a sloppy manner. No account was taken of the time needed to establish these new services, and no provision was made for the smooth transition of responsibility to avoid the huge gap of almost a year that was ultimately created in the processing of applications. Because of this gap, the second-generation has been waiting more than four years to get their hands on the much sought-after Greek identity card. This wait usually involves facing a host of obstacles to their personal well-being and development, if not to their survival in the country.

Finally, there are also other general issues that pose obstacles to the acquisition of citizenship: the lack of effective communication by the authorities of the routes available and the procedures involved in acquiring Greek citizenship; the incomplete, fragmented, and outdated IT network and, above all, the absence of integration and inclusion policies.

Taken together, the issues presented in this report paint a picture of a state that has officially turned its back on the integrated migrant population. The implementation of these policies and the failure to address their shortcomings devalues the right of people who are fully integrated into our society to acquire Greek citizenship. Most dangerously, it divides people into categories according to their social and

economic status, creating an elite category of foreigners through the abuse of the ability to grant honorary naturalisation. Ultimately, it considers worthy for citizenship only those people who have been able to memorise 500 complex topics and who can prove their stable financial status. Since when have these two characteristics been crucial criteria for a person to acquire the status of a citizen in a democracy?

Therefore, the Greek state should certainly aim for a faster and more impartial system of granting citizenship. First and foremost, however, it needs to realise that it is equally important that this system is fair and equitable, and that it is universally accessible to those who qualify for citizenship.

## LEGISLATION

Article 52 of Law [N. 4795/2021](#) (Government Gazette A 62/17.4.2021): exemption from the obligation to obtain a PEGP - Amendment to par. 4 of article 7 of Law 3284/2004.

Articles 36-39 of [N. 4873/2021](#) (Government Gazette A 248/16.12.2021) Articles 36-39: amendments to the naturalisation procedure.

Articles 34-36 of Law [N. 4915/2022](#) (Government Gazette A 63/24.3.2022). Articles 34-36: changes to the suspension and rejection of applications in case of criminal impediments.

\* The above amendments were incorporated in the Code of Greek Citizenship, as in force after the changes of Law 4735/2020.

## DECISIONS-CIRCULARS-INSTRUCTIONS

Decision of the General Secretariat for Citizenship no. [28881/13.04.2021](#): PEGP examinations procedures.

Decision of the Ministry of Interior no. [29845/16.04.2021](#): List of evidence of economic and social inclusion.

Decision of the General Secretariat for Citizenship no. [64871/07.09.2021](#): procedures for the oral interview.

Decision of the General Secretariat for Citizenship no. [71728/04.10.2021](#): procedures for the PEGP examinations.

Circular of the General Secretariat for Citizenship no. [715/18.10.2021](#): details for the implementation of the provisions of Law 4735/2020.

Decision of the General Secretariat for Citizenship no. [738/07.01.2022](#): procedures for the oral interview.

Circular of the General Secretariat for Citizenship no. [81/04.02.2022](#): amending provisions on naturalisation.

Circular of the General Secretariat for Citizenship no. [207/28.03.2022](#): instructions on the validity of residence permits during the process of acquiring Greek citizenship on any legal basis.

Decision of the General Secretariat for Citizenship no. [23083/08.04.2022](#): procedures for the PEGP examination.

Decision of the General Secretariat for Citizenship no. [64506 /03.10.2022](#): procedures for the PEGP examination.

\* \* All the regulatory acts of the Ministry of Interior are available [here](#).

[Opengov.gr](http://Opengov.gr)

[Hellenic Parliament](#)

[National Transparency Portal, Diavgeia](#)

[National Printing Office](#)

[Ministry of Interior](#)

[Citizenship in practice](#)

[Generation 2.0 for Rights. Equality & Diversity](#)

[Hellenic League for Human Rights](#)

**ANNEX 1:  
EVIDENCE TO DOCUMENT ECONOMIC AND SOCIAL INCLUSION**

EVIDENCE OF ECONOMIC INTEGRATION	EVIDENCE OF SOCIAL INTEGRATION
<ul style="list-style-type: none"> <li>• Tax declarations (mandatory).</li> </ul> <p>You can also send additional documents such as</p> <ul style="list-style-type: none"> <li>• Document proving social security clearance,</li> <li>• Document proving social security contributions during employment</li> <li>• Private employment contract</li> <li>• Financial statement of business activity (E3)</li> <li>• Statement detailing real estate assets (E9)</li> <li>• Financial statements from an active bank account</li> </ul>	<ul style="list-style-type: none"> <li>• Certificate of marriage with a Greek citizen</li> <li>• Birth certificates for any of the applicant’s children born in Greece</li> <li>• Certificate of attendance for the applicant or their children at Greek school or other pre-school educational institutions in Greece</li> <li>• Utility bills in the applicant’s name</li> <li>• Copy of house rental agreement submitted to Taxisnet</li> <li>• Certificates of completion of professional training/educational courses from official bodies</li> <li>• Documentation of volunteering/charitable activities</li> <li>• Any proof of continuous residence from the date of submission of the citizenship application up to the present day</li> </ul>

**ANNEX 2:****SUFFICIENT INCOME PER YEAR, ACCORDING TO FAMILY STATUS**

<b>MINIMUM SUFFICIENT INCOME OF A TAXABLE FOREIGNER PER YEAR</b>								
	2007	2008	2009	2010	2011	2012	2013	2014
NO DEPENDANTS	7.500€	7.500€	7.500€	7.500€	7.500€	6.500€	6.500€	6.500€
1 DEPENDANT	8.250€	8.250€	8.250€	8.250€	8.250€	7.150€	7.150€	7.150€
2 DEPENDANTS	9.000€	9.000€	9.000€	9.000€	9.000€	7.800€	7.800€	7.800€
3 DEPENDANTS	9.750€	9.750€	9.750€	9.750€	9.750€	8.450€	8.450€	8.450€
4 DEPENDANTS	10.500€	10.500€	10.500€	10.500€	10.500€	9.100€	9.100€	9.100€

<b>MINIMUM SUFFICIENT INCOME OF A TAXABLE FOREIGNER PER YEAR</b>							
	2015	2016	2017	2018	2019	2020	2021
NO DEPENDANTS	6.500€	6.500€	6.500€	6.500€	7.500€	7.500€	7.500€
1 DEPENDANT	7.150€	7.150€	7.150€	7.150€	8.250€	8.250€	8.250€
2 DEPENDANTS	7.800€	7.800€	7.800€	7.800€	9.000€	9.000€	9.000€
3 DEPENDANTS	8.450€	8.450€	8.450€	8.450€	9.750€	9.750€	9.750€
4 DEPENDANTS	9.100€	9.100€	9.100€	9.100€	10.500€	10.500€	10.500€

**ANNEX 3:  
CITIZENSHIP DIRECTORATES ORGANIGRAM**

<b>MINISTRY OF INTERIOR</b>	
<p><b>Directorate of Citizenship</b>  <b>General Secretariat for Citizenship</b>  <b>Central Citizenship Directorate</b></p>	<p>Secretary General: ATHANASIOS BALERMPAS</p> <p>Department of Verification of Nationality Status            Department of Naturalisation of Foreigners            Department of Naturalisation by Descent            Department of Statistics &amp; Data Management            Department of Secretarial Support &amp; Archiving</p>

<b>REGIONAL DIRECTORATES OF CITIZENSHIP</b>	
<b>ATTICA</b>	
<p><b>Directorate of Citizenship of Attica</b></p> <p>Department of Citizenship by Birth/Education            Department of Citizenship by Education            Department of Secretarial Support, Archives &amp; Statistics</p>	<p><b>Directorate of Citizenship of North &amp; Eastern Attica</b></p> <p>Department of Citizenship            Department of Naturalisation            Secretarial Department</p>
<p><b>Directorate of Citizenship of Athens</b></p> <p>Department of Citizenship            Department of Naturalisation            Secretarial Department</p>	<p><b>Directorate of Citizenship of Southern Attica, Piraeus and the Islands</b></p> <p>Department of Citizenship            Department of Naturalisation            Secretarial Department</p>
<p><b>Directorate of Citizenship of Central &amp; Western Attica</b></p> <p>Department of Citizenship            Department of Naturalisation            Secretarial Department</p>	



## REGIONAL DIRECTORATES OF CITIZENSHIP

### THESSALY - CENTRAL GREECE

#### **Directorate of Citizenship for Thessaly - Central Greece**

Department of Citizenship  
Department of Naturalisation  
Secretarial Department  
Department of Citizenship of Boeotia  
Department of Citizenship of Evia  
Department of Citizenship of Evritania  
Department of Citizenship of Karditsa  
Department of Citizenship of Magnesia  
Department of Citizenship of Trikala  
Department of Citizenship of Fthiotida  
Department of Nationality of Fokida

### EPIRUS - WESTERN MACEDONIA

#### **Directorate of Citizenship of Epirus - Western Macedonia**

Department of Citizenship  
Department of Naturalisation  
Secretarial Department  
Department of Citizenship of Arta  
Department of Citizenship of Thesprotia  
Department of Citizenship of Preveza  
Department of Citizenship of Kozani  
Department of Citizenship of Grevena  
Department of Citizenship of Kastoria  
Department of Citizenship of Florina

### PELOPONNESE, WESTERN GREECE & IONIAN SEA

#### **Directorate of Citizenship of the Peloponnese, Western Greece & Ionian Sea**

Department of Citizenship  
Department of Naturalisation  
Secretarial Department  
Department of Citizenship of Etoloakarnania  
Department of Citizenship of Ilia  
Department of Citizenship of Corinthia  
Department of Citizenship of Argolida  
Department of Citizenship of Messinia

Department of Citizenship of Laconia  
Department of Citizenship of Arcadia  
Department of Citizenship of Corfu  
Department of Citizenship of Kefalonia  
Department of Citizenship of Zakynthos  
Department of Citizenship of Lefkada

## REGIONAL DIRECTORATES OF CITIZENSHIP

### MACEDONIA – THRACE

#### **Directorate of Citizenship of Central Macedonia A ´**

Department of Citizenship  
Department of Naturalisation  
Secretariat Department  
Department of Citizenship of Imathia  
Department of Citizenship of Kilkis  
Department of Citizenship of Pella  
Department of Citizenship of Pieria  
Department of Citizenship of Serres  
Department of Nationality of Chalkidiki

#### **Directorate of Citizenship of Central Macedonia B ´**

Department for Birth/Education for Minors  
Department for Education for Minors & Adults  
Department of Secretarial Support,  
Archives & Statistics

#### **Directorate of Citizenship of Eastern Macedonia-Thrace**

Department of Citizenship  
Department of Naturalisation  
Secretarial Department  
Department of Citizenship of Drama  
Department of Citizenship Evros  
Department of Citizenship of Kavala  
Department of Citizenship of Xanthi

### AEGEAN

#### **Directorate of Citizenship of the North Aegean**

Department of Citizenship  
Department of Citizenship  
Department of Naturalisation  
Secretarial Department  
Department of Citizenship of Samos  
Department of Citizenship of Chios  
Directorate of Citizenship of South Aegean  
Department of Citizenship  
Department of Naturalisation  
Secretarial Department  
Department of Citizenship of Cyclades

### CRETE

#### **Directorate of Citizenship of Crete**

Directorate of Citizenship of Crete  
Department of Citizenship  
Department of Naturalisation  
Secretarial Department  
Department of Citizenship of Chania  
Department of Citizenship of Rethymnon  
Department of Citizenship of Lasithi



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