

HELLENIC REPUBLIC  
GREEK NATIONAL COMMISSION FOR HUMAN RIGHTS

---

Neofytou Vamva 6, 106 74 Athens | T: +30 210-7233221-2

W: [www.nchr.gr](http://www.nchr.gr) | E : [info@nchr.gr](mailto:info@nchr.gr)



**Contribution by**  
**the Greek National Commission for Human Rights (GNCHR)**  
**to the UN Special Rapporteur on the Human Rights of Migrants**  
**in reply to the Questionnaire on pushback practices and their impact on the**  
**human rights of migrants**

**1 February 2021**

The Greek National Commission for Human Rights (GNCHR) is the independent advisory body to the Greek State on matters pertaining to human rights protection. It was established by Law 2667/1998 in accordance with the UN Paris Principles. Forty-one institutions whose activities cover the field of human rights are currently represented in the GNCHR (independent authorities, departments of university-level educational institutions, workers' and disabled persons' confederations, NGOs, political parties and ministries).

The Greek National Commission for Human Rights (hereinafter GNCHR) warmly welcomes the initiative of the UN Special Rapporteur on the human rights of migrants to dedicate his forthcoming report to the 47<sup>th</sup> session of the UN Human Rights Council to explore ways and means to address the human rights impact of pushbacks of migrants on land and at sea, **a topic prioritized on the GNCHR's Agenda for 2021**. The GNCHR had already the pleasure to contribute into the work of the Special Rapporteur in the past<sup>1</sup> and deeply appreciates his devoted efforts on promoting and strengthening migrants' rights. With this in mind, the GNCHR would be more than willing to share input for the preparation of the Special Rapporteur's forthcoming Report on pushbacks, a practice that negates migrants' rights in their very essence given the absolute character of the *non-refoulement* principle from which no derogations are permitted under international human rights law - even in emergency situations such as the global pandemic of Covid-19.

As you already aware of, the GNCHR is the National Human Rights Institution of Greece, accredited with an A-status by the Sub-Committee on Accreditation (SCA) of the Global Alliance of National Human Rights Institutions (GANHRI). The GNCHR closely monitors, since its first years of operation, all issues related to the equal treatment of aliens residing in Greece and the full enjoyment of their special rights guaranteed in international, European and national law. In fact, the GNCHR has institutionalised a standing Sub-Commission on the Application of Human Rights to Aliens.<sup>2</sup> In recent years, the GNCHR provided its expert opinion on legislative amendments of asylum, immigration and naturalisation law, monitored the reception conditions in refugee camps all over Greece with particular emphasis on the situation at the Greek-Turkish borders and the dire living conditions in the Eastern Aegean Islands, alerted the State on the urgent needs of the most vulnerable ones, such as unaccompanied minors and migrants with disabilities and collaborated with the UNCHR Office in Greece in combatting racist violence against migrants, among others, and elaborating specific proposals to the State on refugee integration. In addition, the GNCHR has extensively dealt with the issue of forced labour and trafficking of migrants, presenting to the State a Roadmap for the substantive implementation of the ECtHR's dicta in *Chowdury Case*, after thorough consultations with the competent administrative and judicial authorities and representatives of the civil society.<sup>3</sup> A sampling of the GNCHR's Positions and

---

<sup>1</sup> In 2016, the GNCHR had held consultations with the UN Special Rapporteur, François Crépeau, on his mission to Greece from 12 to 16 May 2016. See also relevant GNCHR's [Oral Statement](#) on the Report of the UN Special Rapporteur on the human rights of migrants on his follow-up mission to Greece. In 2019, the GNCHR participated in the 20<sup>th</sup> anniversary of the mandate of the UN Special Rapporteur and delivered a [Statement](#) (Mexico, 12-13 November 2019).

<sup>2</sup> All GNCHR's decisions and positions are published at the website [www.nchr.gr](http://www.nchr.gr).

<sup>3</sup> GNCHR's [Report](#): ECtHR, Chowdury and others v. Greece: Recommendations for the full compliance of the Greek State, 27.08.2018

Recommendations can be found in its *Reference Report on the Refugee and Migrant Issue* published last September.<sup>4</sup>

On the specific matter under consideration, the GNCHR brought to the attention of the State, as early as 2002, reports from NGOs on informal pushback practices occurring at the Evros region. Since then, the GNCHR closely monitors the situation and intervenes where appropriate. As an introductory remark, in recent years there has been an increase in incidents reported by international organizations,<sup>5</sup> civil society<sup>6</sup> and the press on individual or group pushbacks allegedly taking place at the Greek-Turkish land and sea borders - which also constitute the EU's external borders. Unfortunately, no Greek Court had yet the opportunity to rule upon such a complaint<sup>7</sup> and in few cases where official investigations were opened<sup>8</sup> there has been no outcome. The GNCHR consistent to its role as a "human rights watchdog", issued two *Statements* (in 2017<sup>9</sup> and in 2018<sup>10</sup>) calling the Greek State to take all measures in order to ensure: (a) the respect of the *non-refoulement* principle, (b) the unhindered, timely and effective access to international protection procedures for all foreigners with irregular entry without discrimination based on race, religion, ethnicity, participation in a social group of political opinion and (c) the timely and thorough investigation of all complaints on informal, violent pushbacks in Evros. In 2020, the GNCHR, worried about multiple reports on violent pushbacks during the period 28.02.2020-2.3.2020 and allegations of pushbacks at sea using life-threatening practices decided to prioritize this issue and shift its attention into formulating concrete proposals to the State in order to effectively tackle this phenomenon whose characteristics have gradually but steadily being

---

<sup>4</sup> GNCHR's [Reference Report](#) on the Refugee and Migrant Issue, September 2020 [summary in English].

<sup>5</sup> The UN Committee Against Torture, the UN Working Group on Arbitrary Detention, the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) and the Council of Europe's Commissioner for Human Rights have raised concerns over reported incidents of pushbacks.

<sup>6</sup> Reports, information and complaints submitted by the Hellenic League for Human Rights, the Greek Council for Refugees and Amnesty International which are GNCHR's Members but also from Refugee Support Aegean, Human Rights 360, HIAS and ARSIS.

<sup>7</sup> In June 2017, the Hellenic League for Human Rights a complaint was submitted before the Prosecutor of the Supreme Court Prosecutor regarding push-backs incidents against Turkish nationals during the period of May-June 2017. More recently, the Greek Council for Refugees submitted a criminal report to the Prosecutor of the Supreme Court, together with a file with information concerning allegations of illegal, informal and violent push-backs of refugees from the Evros region, which also concern Turkish citizens, in particular during the period from 27.4.2019 until 19.6.2019. See relevant [Press Release](#) [in Greek].

<sup>8</sup> In addition to the Division of Internal Affairs of the Hellenic Police which has initiated investigation proceedings, the Greek Ombudsman commenced on 9 June 2017 an ex officio investigation for alleged illegal push backs to Turkey by the Greek authorities, of Turkish citizens who had entered Greece seeking international protection. See relevant [decision](#) [in Greek].

<sup>9</sup> GNCHR's [Statement](#) on complaints regarding illegal pushbacks in Evros, 22.7.2017 [in Greek].

<sup>10</sup> GNCHR's [Statement](#) on complaints regarding informal pushbacks at the region of Evros, 29.11.2018.

consolidated, revealing a repeated methodology. Following a hearing of relevant stakeholders, the GNCHR issued a *Statement*<sup>11</sup> whereby she responded to above allegations by proposing to the Greek authorities **the establishment of an official independent mechanism for recording and monitoring informal pushbacks complaints**. The GNCHR is currently working in this direction.

Taken into account the specific areas of interest to the Special Rapporteur (Questionnaire), the GNCHR would like briefly to note the following:

### **Question 1**

*Please provide information on any relevant legislation or policy in relation to the right to asylum to seek and enjoy in your country, which guarantees that migrants including asylum seekers' protection needs are examined individually, and they are not pushed back at the international border without access to this assessment and other relevant procedures. Grateful if you could kindly submit the original text of the legislation or policy, accompanied by an English translation if it is in a language other than English, French or Spanish.*

Greece has signed and ratified the 1951 Geneva Convention Relating to the Status of Refugees (Law Decree 3989/1959, Government Gazette A' 201, 26.9.1959) as well as the 1967 New York Protocol (Mandatory Law 389/1968, Government Gazette A' 125, 4.6.1968). Therefore, State authorities are bound by Article 33 on the prohibition of *refoulement* to a danger of persecution under international refugee law. Greece has also signed and ratified the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (Law 172/1-3.3.1988, Government Gazette A' 116) and the International Convention for the Protection of All Persons from Enforced Disappearances (Law 4268/2014, Government Gazette A' 141, 27.6.2014), which explicitly contain provisions of *non-refoulement* to countries where there is a risk of torture (Article 3 (1) CAT) or enforced disappearance (Article 16 (1) ICPPED). Greece's initial report under ICPPED is currently under review from the Committee on Enforced Disappearance.<sup>12</sup> On the other hand, the Committee against Torture has repeatedly expressed concerns over forced returns of asylum seekers and migrants at the sea and land borders with Turkey without the respect of procedural guarantees, such as prior individual risk assessment, access to asylum procedures and legal remedies. In her last Concluding Observations (2019), the Committee recommended, among other, that the

---

<sup>11</sup> See GNCHR's [Statement](#) regarding the alleged push back practices, 9.7.2020.

<sup>12</sup> The [List of Issues](#) was issued on 21.10.2020. Among other, the Committee asks more information regarding specific measures to prevent enforced disappearances and comply with the principle of *non-refoulement* in expulsion, return, surrender or extradition procedures, especially in the context of the EU-Turkey Statement and during the Covid-19 pandemic (Chapter IV (19)).

State enhances efforts to ensure the criminal accountability of perpetrators of acts that put the lives and safety of migrants and asylum seekers at risk and ensure that victims, witnesses and claimants are protected against ill-treatment or intimidation that may arise as a consequence of their complaints. In this respect, the GNCHR has found that there is a lack of evidence as well as of effective cooperation between authorities that hinder bringing those responsible for such illegal acts to justice. In addition, these acts remain extensively underreported since victims fear arrest, detention or expulsion by the authorities. Therefore, the GNCHR proposed the use of technological equipment and other ways of operational action to collect objective data for the effective investigation of complaints on pushbacks as well as the establishment, in the Greek law, of a protection regime for victims denouncing practices of pushbacks to facilitate their access to justice.

Greece is also a member of the Council of Europe, having signed and ratified the European Convention on Human Rights (Greek Law Decree 53/19-20.9.1974) and all Protocols to the ECHR, with the exception of Protocols 4 and 12. Therefore it is bound by Article 3 on prohibition of torture, inhuman and degrading treatment as interpreted by the Court to apply also in cases of extradition, rendition or any other form of removal to a country where there is a risk of torture or other forms of ill-treatment reaching the threshold of Article 3.

Finally, Greece is also a member of the European Union who has shared competence with Member States on migration and asylum and has developed, since 1999, a sophisticated Common European Asylum System (CEAS) - currently under review. Consequently, Greece is bound by Article 18 of the EU Charter of Fundamental Rights that explicitly provides for a right to asylum, as further analysed and elaborated in Qualification Directive (2011/95/EU, Articles 2, 13, 18), in Asylum Procedures Directive (2013/32/EU, Preamble par. 12, 15-18 and Articles 1, 2, 10 ), in Reception Conditions Directive (2013/33/EU, Preamble par. 26, Articles 3, 6), in Schengen Borders Code (Regulation EU 2016/399), in Dublin III Regulation (604/2013) and in Regulation establishing rules for the surveillance of the external sea borders (656/2014). Greece has also transposed into national law Directive 2008/115/EC on Returns whereby any removal measure must comply with the principle of *non-refoulement*.

Significant changes to national asylum and immigration legislation have taken place recently. Greek Law 4636/2019 on International Protection (as amended by Law 4686/2020) codified all pre-existing laws on recognition of beneficiaries of international protection, asylum procedures, reception conditions for applicants for international protection and judiciary protection. The GNCHR participated in the legislative process by submitting her Observations to the Minister and the Parliament.

As a general observation, the new legislative framework is considered by the GNCHR, the UNHCR and civil society as a regress to migrants' rights (in comparison with the previous regime). The detention measure was significantly strengthened and generalized, contrary to international standards. Tighter deadlines were introduced to speed up asylum procedures without securing first decent living conditions for the applicants, adequate legal safeguards for the most vulnerable ones, such as victims of torture and unaccompanied minors and the unhindered provision of free legal aid to all applicants who wish to submit an appeal, as minimum guarantees for a fair and efficient asylum procedure.<sup>13</sup>

### **Question 2**

***Please provide information on any existing good practices or measures taken (such as screening and referral mechanisms at borders) in your country to ensure that persons crossing international borders in mixed movements are protected according to international human rights law. Please indicate any specific measures aimed at reducing vulnerabilities of migrants, including by applying a human rights-based, gender- and disability-responsive, as well as age- and child-sensitive approach.***

Greek Law 4636/2019 (Article 39) introduced a 5 steps procedure for all third country nationals and stateless persons who have illegally entered the country or are found to illegally reside in Greece and their citizenship and identity are not proved by virtue of an official document. The so-called reception and identification procedures include: (1) provision of information on their rights and obligations; (2) allocation to a reception centre or other establishment; (3) registration and medical screening; (4) referral to an international protection procedure and (5) further referral (e.g. to forced return procedure) and relocation. More particularly, applicants who are identified to belong to a vulnerable group (Articles 39 par. 5 (d) and 58 par. 1 of Law 4636/2019), shall be referred to social support and protection by the Manager of the Reception and Identification Center (RIC). However, vulnerability assessments delay due to shortage of medical personnel, especially at the Eastern Aegean Islands.<sup>14</sup> It is noteworthy, that as a result of the unprecedented number of refugees and migrants arriving at the Greek shores in 2015-2016, the Greek State significantly increased its reception capacity

---

<sup>13</sup> For further analysis on the GNCHR's positions see GNCHR's [Observations](#) on Draft Law of the Ministry for Citizen's Protection "On international protection: provisions for the recognition and status of third country national or stateless persons as beneficiaries of international protection and other provisions" [in Greek only] and GNCHR's [Observations](#) on Draft Law of Ministry for Migration and Asylum "Improvement of migration legislation, amendments of provisions of Laws 4636/2019, 4375/2016, 4251/2014 and other provisions". For the current asylum procedure, visit the official website of the Ministry for Migration and Asylum, [Applying for Asylum](#).

<sup>14</sup> For more information, see AIDA's [Country Report on Greece](#) 2019, updated 30.11.2020.

whereas a centralized First Reception Agency was established to coordinate all efforts and stakeholders in the field. The Greek reception system was organized based on common European reception standards (Reception Directive 2013/33/EU which was transposed in 2016). Even though much effort and resources were channeled into the reception system, due to the Greek financial crisis and EU asylum and migration policy (e.g. EU-Turkey Statement), thousands of asylum seekers were trapped in the Eastern Aegean Islands living under indecent conditions, exposed to multiple risks of human rights infringements.<sup>15</sup> Since 2020, a decongestion of the islands is gradually taking place to alleviate the pressure on the islands while priority is given to those vulnerable to Covid-19 and unaccompanied minors (UOMs). In fact, thanks to coordinated efforts of national authorities, international organizations and EU member states, the Greek State succeeded in relocating all UOMs from RICs to proper shelters in Greece or abroad.

### **Question 3**

***Please provide information on existing restrictions or limitations in law and in practice in relation to the right to claim and seek asylum at international borders in your country (e.g., border controls, restricted access to territory) and elaborate the impact of these restrictions on the protection of the rights of migrants crossing international borders.***

In February 2020, new challenges and increasing tensions emerged along the Greek-Turkish borders due to thousands of refugees and migrants being gathered at the invitation of the Turkish government. The Greek Government considered that the "sudden, massive, organized and coordinated pressure from population movements on its eastern, land and sea borders constitutes an active, serious, exceptional and disproportionate threat to the country's national security" and suspended for 1 month the lodging of new asylum applications.<sup>16</sup> The GNCHR, noting with concern the developments on the Greek-Turkish land borders where increasing tensions were observed along the border line as well as the situation on the islands where the increase in incidents of violence, racist attacks, hate speech and xenophobia was alarming, issued a *Statement* with specific proposals addressed to the national authorities as well as to the EU and its Member States.<sup>17</sup> At the end of March 2020, the suspension measure of lodging an asylum application in Greece ceased permanently, while those who entered

---

<sup>15</sup>GNCHR [Announcement](#) on the unsettling situation in the Eastern Aegean Islands and the recent asylum developments, 6.9.2019. GNCHR's [Press Release](#): "In Samos, the system has collapsed", 23.1.2020. GNCHR [Statement](#) on the fire in Moria and the day after, 11.9.2020.

<sup>16</sup> See Athens-Macedonian News Agency, «KYSEA: Upgrading the country's eastern, land and maritime border protection measures to the maximum level», 01.03.2020 [in Greek] and Greek Legislative Act "Suspension of Asylum Applications", Government Gazette A' 45, 02.03.2020.

<sup>17</sup> GNCHR, [Statement](#): Reviewing asylum and immigration policies and safeguarding human rights at the EU borders, 5.3.2020.

in March 2020 and wished to apply for international protection were able to register their claim. However, the GNCHR expresses its concern about the indiscriminate prosecution and detention of those who have illegally entered Greece in March.

#### ***Question 4***

***Please provide information on any concrete instances of pushbacks, including an analysis on the circumstances of the event.***

The GNCHR has no competence by its founding law to receive individual complaints. Consequently, the Committee receives information on concrete incidents from secondary sources such as her members and partners. GNCHR has a pluralistic composition where experts from 41 institutions are nominated for a 3 years' term covering a wide spectrum of human rights; among them independent authorities such as the Ombudsman, trade unions and non-governmental organisations with long-time presence in the field, such as the Greek Council for Refugees and Amnesty International. In addition, the GNCHR is the co-founder (with the UNCHR Office in Greece) of the Racist Violence Recording Network which is comprised of 46 NGOs; among them, Human Rights 360, HIAS, Arsis that provide services to migrants and grass root organizations such as the Greek Refugee Forum, Greek Migrants Forum, Melissa Network, Generation 2.0 RED etc. Finally, within the performance of her duties, the GNCHR organises oral hearings, by inviting experts and other stakeholders to share their experience on a particular topic under review by the Commission. A special hearing on pushbacks was organized on 18 June 2020 with the participation of representatives from the Government, security forces, international organizations, independent authorities and national non-governmental organizations.<sup>18</sup> Information received by experts participating in the above hearing has been duly taken into account for the formulation of the GNCHR's specific Recommendations addressed to the State.<sup>19</sup>

#### ***Question 5***

***Please indicate any specific challenges that your Government has encountered, in the context of the COVID-19 pandemic, on ensuring the human rights of migrants crossing international borders, either by land or by sea.***

During the Covid-19 pandemic, migration flows decreased. Greece took restrictive measures on rights and freedoms for the purpose of protecting and safeguarding public health but did not activate the derogation clause of Article 15 ECHR, unlike other European States. The GNCHR, at the end of the first lockdown, evaluated the

---

<sup>18</sup> GNCHR's [Press Release](#): Hearing of public authorities and persons on refugee and migrant issues during the meeting of the Third Sub-Commission, 18.6.2020.

<sup>19</sup> See GNCHR's Statement regarding the alleged push back practices, *op. cit.*

human rights impact of the restrictive measures adopted by the Government and produced a *Report*<sup>20</sup> with the basic human rights principles which must govern all Covid-19 measures. More particularly, the GNCHR stated that Covid-19 measures must not have an adverse impact on migrant and refugee rights. Among measures to prevent the spread of coronavirus in refugee population was the decision to speed up transfers (of elderly people and people suffering from chronic diseases) from the RICs in the Eastern Aegean Islands to accommodation sites in mainland Greece. Another positive impact was the relocation program, which run on a voluntary basis, of vulnerable asylum seekers from Greece to other EU States. On the other hand, the GNCHR was particularly worried about the prolonged continuation of restrictive measures imposed to refugee camps despite the lifting of such measures with regard to the rest of Greece's population. In addition, since March 2020, the Greek Government has issued several Legislative Acts temporary restricting entry and exit in the Greek territory of third country nationals to combat the spread of Covid-19.<sup>21</sup> Regardless the imposed restrictions on entry and exit, whoever enters –legally or illegally- the Greek territory is subjected to a mandatory quarantine. Furthermore, all returns of third country nationals to Turkey by virtue of the EU-Turkey Statement, have been suspended since March 2020 due to the Covid-19 pandemic.

### **Question 6**

***Please indicate any challenges and/or obstacles faced by Governmental institutions or civil society organizations and individuals in protecting the human rights of migrants at international borders, including those in distress at sea and in situations where pushbacks or pullbacks are likely to take place.***

In 2015-2016 the death toll of migrants trying to cross the Mediterranean Sea to reach Europe was dramatic. According to the UNCHR, 8.867 migrants were drowned or gone missing.<sup>22</sup> On the other side, the Greek Coast Guard has rescued thousands of migrants who were in distress at sea.<sup>23</sup> In addition, Frontex operates border control missions in the area (Operation Poseidon<sup>24</sup>) while it has also deployed two RABBITs

---

<sup>20</sup> GNCHR's Report on the need for protection of human rights with regard to the measures taken in response to the coronavirus (COVID-19) pandemic and recommendations to the State, June 2020.

<sup>21</sup> All relative legislation is published on a [governmental site](#) dedicated to Covid-19 relevant information [in Greek].

<sup>22</sup> From 2014 to 2020, the total number of dead and missing is 20.315 persons. Source: UNCHR Operational Portal, [Mediterranean Situation](#), last updated 25 June 2021.

<sup>23</sup> According to official data, the Hellenic Coast Guard provided help to 108501 people in distress in 2015, to 70932 in 2016 and 32322 in 2017. Joint Rescue Coordination Center, [Annual Report 2017](#), January 2018 [in Greek].

<sup>24</sup> Operation Poseidon supports Greece with border surveillance, saving lives at sea, registration and identification capacities, as well as combatting cross-border crime. The operational area covers the Greek sea borders with Turkey and the Greek islands. For more information, visit the Frontex site ([Main Operations](#)).

units.<sup>25</sup> The GNCHR, having identified a gap in legislation and practice regarding the treatment of missing or deceased migrants, decided to adopt the *Declaration of Mytilene* to serve as a consolidated text of applicable international standards for future reference by the state authorities, in the formulation of immigration policies and laws and in the exercise of their duties vis-a-vis missing migrants and their mourning families.<sup>26</sup>

With respect to NGOs active in Greece in asylum, migration and social inclusion matters, there is an obligation, since 2016, to be registered in a special "Register of Greek and Foreign Non-Governmental Organizations (NGOs)", operating under the Ministry for Migration and Asylum. However, by virtue of Laws 4636/2019 and 4686/2020<sup>27</sup>, the requirements for registration and certification of these NGOs became stricter, involving also the registration of their members and employees (physical members) for anti-laundering purposes. According to an Opinion by the Expert Council on NGO Law which reviewed the legislation in place, the above requirements "give rise to problems of compliance with the rights in Articles 8 and 11 of the ECHR" because of a lack of legitimacy, proportionality and legal certainty. These provisions will have a significant chilling effect on the work of the civil society which "may produce a worrying humanitarian situation, given the significant needs of this very vulnerable population and already existing gaps in the significant needs of government and others, and the continued violence and judicial harassment such NGOs face, including criminalisation of aspects of their work".<sup>28</sup> The GNCHR closely monitors all developments in the field contributing to the promotion and protection of other human rights defenders.<sup>29</sup> In this regard, she has recently alarmed the State on the escalating situation in the islands, where the Racist Violence Recording Network recorded specific racist and xenophobic attacks against newcomers, refugees and migrants, international organizations' employees, NGOs, CSOs as well as journalists.<sup>30</sup>

---

<sup>25</sup> Frontex [News Release](#): Frontex to launch rapid border intervention at Greece's external borders, 2.3.2020.

<sup>26</sup> Dignified Treatment of all the Missing and Deceased Persons and their Families as a Consequence of Migrant Journeys - The Greek National Commission for Human Rights [adopts the Mytilene Declaration](#), 7.2.2019.

<sup>27</sup> See also relevant Ministerial Decisions nr. 3063/2020 and 10616/2020 for the detailed procedure and documents for registration, re-registration and certification.

<sup>28</sup> Expert Council on NGO Law of the Conference of INGOs, [Opinion](#) on the compatibility with European standards of recent and planned amendments to the Greek legislation on NGO registration, 2.7.2020, CONF/EXP(2020)4.

<sup>29</sup> Global Alliance of National Human Rights Institutions (GANHRI), [The Marakesh Declaration](#) - Expanding the civic space and promoting and protecting human rights defenders with a specific focus on women: The role of National Human Rights Institutions, 12.10.2018.

<sup>30</sup> GNHCR, Statement: Reviewing asylum and immigration policies and safeguarding human rights at the EU borders, *op. cit.* Racist Violence Recording Network [Press Release](#): Serious concern over attacks against refugees and humanitarian workers, 05.03.2020.