



δίκτυο
για τα δικαιώματα
του παιδιού

Πέρα από λόγια και συμβάσεις

network
for children's
rights

Beyond words and conventions

April 7th 2025

At first it is important to highlight that as it stated in the Biennial's report preamble the consultation took place only between the competent Ministries and public authorities. Therefore, neither a consultation with CSOs on children's rights and protection nor a consultation with children or group of children took place.

A general comment in the Biennial report is that specific indicators for the monitoring and evaluation of Child Guarantee measures have not been introduced. Also, a central database on children with disaggregated data on all areas of the UNCRC has yet to be developed.

Since the report is extensive, taking into consideration the annexes and the different topics, sectors and issues that it touches, we have selected some specific comments referred to the report, as depicted below.

- As regards children at risk of poverty it should be noted that the figures presented in AROPE (see chapter 4 p. 31 and below) do not include those children who do not have a permanent residence and do not live in the type of household on which the survey is based. In other words, they do not include those who are presumed to be the poorest (homeless, Roma, refugees-asylum seekers, those housed in institutions, etc.).
- For the chapter 1.2.4. (p.6) A healthy meal every school day the reality is that not all schools in Greece are covered by the program. Unfortunately, the criteria established under 3.3 (p. 17) are not applicable to cover all the children that are at risk of poverty or social exclusion or living in conditions of severe material deprivation. From the children that participate in our activities in a degraded area in Athens we have observed that the need for qualitative food and nutrition is very big.
- Regarding the monitoring of the Child Guarantee implementation (chapters 1.4, 1.5 p. 7-8), as CSO on child protection sector we haven't received yet any information on any IS as described on the Biennial report. Specifically, the extraction of the relevant indicators and other statistical analyses, through the functions and tools of the Information System for the Guarantee for Children, providing the necessary documentation and data which, when evaluated, can lead to the improvement of the services provided.
- For the chapter 1.5. (p.8): Arrangements for stakeholder consultation and participation in the implementation and monitoring phase of the NAP, Network for Children's Rights has not been called or participated in any network of representatives or in a consultation process.
- As regards the roll-out of services (p.12) provided in Annex II (Table, Excel 8.1) and Annex III (Table, Excel 8.2), and the supporting policy framework in Annex IV (Table, Excel 9) a general comment is that many actions either not started or remain

unfinished. Furthermore, many actions remained on a pilot phase / activity and after the completion of the pilot phase no further funding was provided for the continuation and expansion of the activity. Moreover, in most of the actions targets and intermediate targets by 2030 are not filled, therefore it is unclear what are the plans for those actions and how will they be measured and monitored

- The "All Children in Education (ACE)" program (p.14), ended on June 2024 and no continuation was in place.
- The action "Support to Primary and Secondary Education Schools by Psychologists and Social Workers", (p.15) is partially implemented and not in every school. In addition, one psychologist or one social worker is responsible for five schools. Thus, each professional is visiting one school per day. As can be seen, taking into consideration the number of students in every school, at least in big cities, it is impossible for the professionals to provide preventive services (group discussions, workshops, etc.), even to meet the students once.
- The "European School Fruit, Vegetable and Milk Distribution Program" (p.19) should be expanded nationally in order to cover the nutrition needs of all students and to avoid discrimination on healthier nutrition among them.
- The financial assistance for applicants for international protection (p.24) has been paused since the June 2024. The last allowance was on October 2024 for the months May – June 2024.
- The "Children's Homes" (3.7.3 p.26) do not follow the Barnahus model and children victims of exploitation and abuse went only for the forensic interview and do not receive accommodation or psychosocial support. In practice only the "Children's Homes" in Athens and Piraeus which are co-located is functional.

In conclusion, for an improved implementation of the Child Guarantee more operating mechanisms need to be established, engagement of child rights CSO and children themselves, as well as further empowered of the understaffed social services, along with improved coordination among the competent authorities at local, regional and national level. Information on Child Guarantee funds, co-designing of programs and collaboration with child rights CSO is of high importance to be taken into consideration.