



1.1 BILLION EUROS, 63 PROJECTS, SIX COUNTRIES, ONE PATTERN

How EU funds violate fundamental rights

Annex 4 - Project examples (Bulgaria, Czechia, Greece, Hungary, Poland, Romania)

May 2025

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FRONT COVER IMAGE

Shows the construction of containers for Roma communities in Romania through an EU funded project.



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List of abbreviations

AMIF	Asylum, Migration and Integration Fund
BMVI	Border Management and Visa Instrument
Charter	EU Charter of Fundamental Rights
CLLD	Community Led Local Development
CJEU	Court of Justice of the European Union
CNCD	National Council for Combating Discrimination
ECRE	European Council on Refugees and Exiles
ENIL	European Network on Independent Living
ERDF	European Regional Development Fund
ESF	European Social Fund
NGO	Non-governmental organisation
OP	Operational programme
UNCRPD	United Nations Convention on the Rights of Persons with Disabilities
UN CRC	United Nations Convention on the Rights of the Child

Introduction

The following document constitutes Annex 4 of the report “1.1 Billion euros, 63 Projects, Six Countries, One Pattern: How EU funds violate fundamental rights”. It provides an overview of project examples, in some cases these are call for proposals, collected as part of the FURI project in Czechia, Romania, Bulgaria, Greece, Poland and Hungary.

It total, the research documented 63 project examples involving an estimated total value of approximately 1.1 billion euros. The original project values are in the national currencies. An estimate in EU is also provided, calculated based on the exchange rate in May 2025.

Each example has been summarised for brevity, presenting with the following information:

- Locality concerned;
- Short description of the project;
- Explanation of the rights violation at stake;
- Total project cost;
- Explanations on actions taken, if any;
- Project/call for proposals reference number.

These examples address issues such as educational and housing segregation, institutionalisation, the reception of asylum seekers, and migration control (e.g. pushbacks).

The pictures included in the report come either directly from the project partners or from a variety of publicly available sources, such as websites from the managing authorities, google maps, and project beneficiaries' websites.

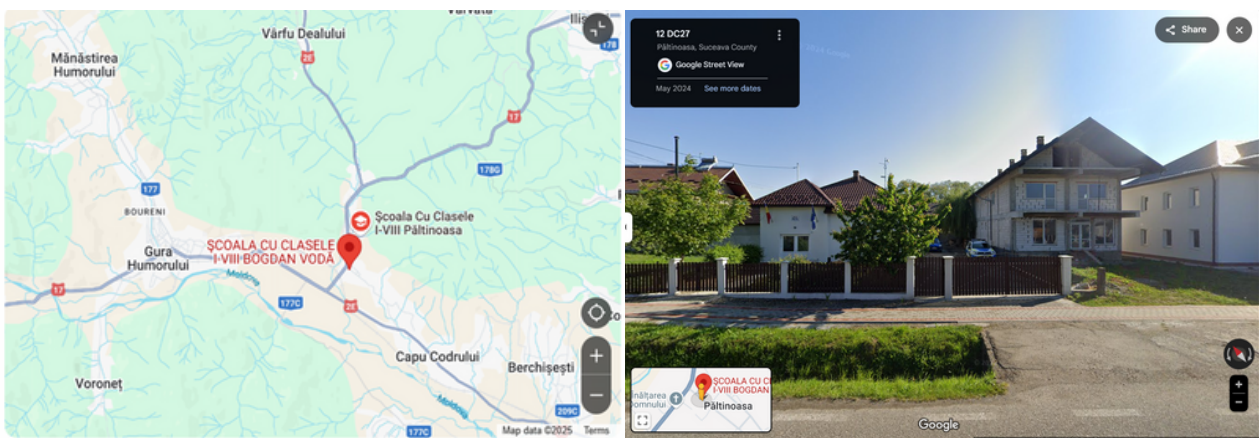
For detailed information and context, please refer to the national reports, which are accessible via the FURI project website and the websites of partners of the project.



Education segregation

PROJECT 1 - ROMANIA, SUCEAVA COUNTY

Location	Păltinoasa Gymnasium School, Suceava County, Romania
Description	Forty-four Roma students were relocated to the school's sports hall, a separate building from the main school where the majority of students are taught. The sports hall is inadequately heated during winter and lacks direct access to sanitary facilities. The 44 students (from preparatory classes to grade 4) were placed in two classes and taught simultaneously.
Rights violated	Segregated education of Roma students based on ethnic and socio-economic criteria. Art 21, Charter
Funding	Total project budget: 1,261,000 lei [247,254 EUR], ESF
Actions taken	The National Council for Combating Discrimination (CNCD) <u>confirmed</u> that an act of school segregation had indeed occurred: <i>"The problem is segregation on ethnic grounds. That is, 99% of the Roma children from that village were relocated."</i> Consequently, on 2 October 2024, the CNCD decided to fine Păltinoasa Gymnasium School in Suceava County 5,000 lei, and the Suceava County School Inspectorate 3,000 lei for segregating 44 Roma students.
Project reference	EduOut-School Outside the Classroom (MySMIS code 154196)



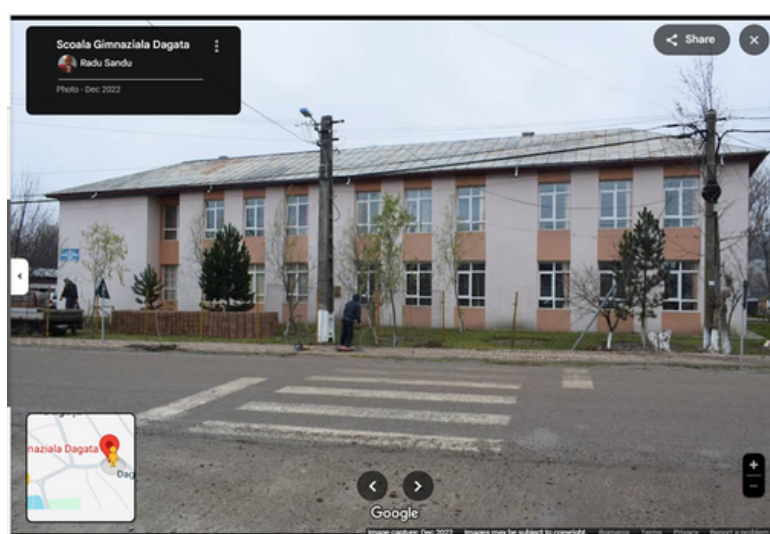
PROJECT 2 ROMANIA, VÂLCEA COUNTY

Location	"Luca Solomon" Gymnasium School, Vaideeni, Vâlcea County, Romania
Description	The project aimed to prevent school dropout and reduce early school leaving among students. The expected outcomes included improved academic performance, more positive attitudes, and increased openness towards school in general. However, the project involved the creation and operation of separate classes at the gymnasium level specifically for Roma students.
Rights violated	Segregated education of Roma students based on ethnic and socio-economic criteria. • Art 21, Charter
Funding	Total project budget: 900,226 lei [176,514 EUR], RRF
Actions taken	According to the <u>decision of the CNCD</u> (Hotararea nr. 438, din 30.08.2023), the Gymnasium School in Vaideeni, Vâlcea County, was fined for segregation after dividing students into classes based on their ethnicity and place of residence. The fine, in the amount of 2,000 lei, creating separate classes based on ethnicity and place of residence.
Project reference	PNRAS code F-PNRAS-1-2022-2191 - "Reducing School Dropout at Luca Solomon Gymnasium School"



PROJECT 3 ROMANIA, IASI COUNTY

Location	Dăgâța, Iași County, Romania
Description	Two projects were aimed at preventing school dropout and reduce early school leaving among students. The expected outcomes were improving academic results, attitudes, and openness toward school in general. However, the projects involved the creation and operation of separate classes at the gymnasium level specifically for Roma students.
Rights violated	Segregated education of Roma students based on ethnic and socio-economic criteria. • Art 21, Charter
Funding	Total project budget: 5,279,000 lei [1,035,098 EUR], ESF
Actions taken	According to the <u>decision</u> of the CNCD (Hotararea nr. 504 din 17.06.2020), based on Art. 2 Para. 1, Art. 2 Para. (4), Art. 11 Para. 1, and Art. 15 of O.G. 137/2000, are present, and the defendant will be fined 2,000 lei, while the Iași County School Inspectorate will be fined 4,000 lei. Additionally, the defendant is required to take the necessary steps to ensure that the school has and implements an effective desegregation plan".
Project reference	• "Relevant Curriculum, Open Education for All" – CRED (SMIS Code 2014+: 118327) • "Friendly Schools in Involved Communities," (SMIS Code – 106616), POCU/76/6/18/106616



PROJECT 4 ROMANIA, IASI COUNTY

Location	"Titu Maiorescu" Secondary School, Iași, Romania
Description	The "Școala DA" project aimed to increase access to education and promote social inclusion for 430 children, including 105 of Roma ethnicity and 60 from rural areas, by providing an integrated package of psycho-social and educational services, as well as developing professional skills among 240 teachers. Despite being enrolled at Titu Maiorescu School in Iași, 122 Roma students were transferred to Ion Neculce Secondary School in Iași, which is known for ranking among the lowest compared to other educational institutions.
Rights violated	Segregated education of Roma students based on ethnic and socio-economic criteria. • Art 21, Charter
Funding	Total project budget: 3,584,503 lei [702,843 EUR], ESF
Actions taken	The PRO EUROPA Roma Party Association filed a complaint, which was subsequently withdrawn. Following the withdrawal, the CNCD (Hotararea nr. 172) closed the case. At the same time, the Head of the CNCD, Csaba Asztalos, <u>stated</u> : 'We need to discuss how we reached a point where 80% of the students are of Roma ethnicity'.
Project reference	<u>"Școala DA" Project, cod SMIS 104951</u>



PROJECT 5 HUNGARY, SZOLNOK COUNTY

Location	Szolnok county, Hungary
Description	The main objective of the project was complex and targeted support for broad spectrum of public education institutions, from kindergarten to secondary school. It included the development of a system of professional educational services at regional and local level. The project aimed to reduce early school leaving, segregated education, underperforming in national competency tests.
Rights violated	The program, one of the largest EU-funded educational initiatives targeting early school leaving (ESL) and disadvantaged students, failed to address fundamental rights violations, particularly segregation. According to the <u>evaluation of the project</u>, the level of segregation remained intact or even slightly increased during the program. • Art 14, 21, Charter
Funding	Total project budget: 11,623,516,728 HUF [28,706,420 EUR], ESF
Actions taken	None
Project reference	<u>EFOP-3.1.5-16-2016-00001</u> - Support for institutions at risk of early school leaving

PROJECT 6 BULGARIA, BRATYA DASKALOVI

Location	Bratya Daskalovi, Bulgaria
Description	The project 'Ready for Success' aims to address the integration of Roma communities in the education system, especially in small settlements. It tackles isolation, prevents early dropout, and reduces future labour market exclusion. The project includes activities such as assessing children's attitudes, identifying contributing factors, and understanding parental expectations; providing supplementary Bulgarian language classes; and organising extracurricular activities.
Rights violated	The project includes investments in the segregated area, which leads to further segregation. The project primarily focuses on behavioral correction and attitude change in Roma communities, which justifies that the underlying assumption is flawed. This approach not only fails to address broader issues of poverty and spatial segregation but also neglects the deeper, systemic factors contributing to educational disparities. Excerpt from the municipality's development plan reveals a tendency to blame the minority community, showcasing discriminatory attitudes rather than exploring underlying systemic problems. The plan's explanation for school dropout rates, while mentioning economic factors and migration, disproportionately focuses on "cultural practices" within the Roma community, with negative tone. • Art. 14, 21 Charter
Funding	Total project budget: 9,274,578 BGN [88,197 EUR], ERDF
Actions taken	None
Project reference	<u>BG05M2OP001-3.001-0081</u>

PROJECT 7 BULGARIA, TUNDZHA

Location	Tundzha, Bulgaria
Description	The project covers all 44 rural settlements in Tunja municipality, it focuses on areas with concentrated Roma populations and marginalized groups. It will provide key interventions include improving access to employment, education, health, and social services". It also focuses on the education of the Roma children.
Rights violated	The project fails to address the root problem of educational segregation. Although employing educational mediators (10 in total) is a valuable practice with demonstrable positive outcomes, their impact is limited. The projects fail to address broader issues of poverty and spatial segregation, which significantly limit Roma children's access to quality education. The project also focuses on behavioural correction and attitude change of Roma communities, it implies that the problem lies within the Roma community itself, rather than addressing the systemic factors contributing to educational disparities. • Art. 14, 21, the Charter of Fundamental Rights
Funding	Total project budget: 9,274,578 BGN [173,791 EUR], ERDF
Actions taken	None
Project reference	<u>BG05M9OP001-2.018-0013-2014BG05M2OP001</u>

PROJECT 8 CZECHIA, OSTRAVA

Location	Ostrava, Czechia
Description	Between 2016 and 2020, approximately €10 million was allocated to the project Equal Access for Romani and Socially Disadvantaged Children. While the project's stated goal was to ensure equal access to quality education, its outcomes were misaligned with this objective. Instead of promoting inclusion, the project contributed to the further segregation of Roma communities. Notably, both the number of segregated Romani children and school dropouts increased during this period.
Rights violated	This ongoing segregation highlights serious failures in ensuring that EU funding complies with the EU's anti-discrimination framework. Monitoring and enforcement mechanisms proved inadequate, allowing this misuse of funds to continue unchecked. Compounding the problem, some municipal officials openly denied the existence of segregated schools, despite clear evidence. This institutional denial obstructed meaningful reform, made it nearly impossible to reallocate resources effectively, and prevented accountability for the misuse of EU funds.
Funding	Total project budget: 178,540,000 CZK [7,147,317 EUR], ESF
Actions taken	None
Project reference	CZ.02.3.61/0.0/0.0/15_007/0000212

PROJECT 9 GREECE

Location	Territory of Greece
Description	Effective inclusion of pupils with disabilities and/or special educational needs in education; the reduction of school failure and drop-outs; the smoother integration of pupils with special educational needs into the education system, and ultimately the improvement social cohesion.
Rights violated	EU funds support contributes to the expansion of Special Schools and Special Vocational Education and Training Workshops (SVETWs), which may risk perpetuating segregation, in possible breach of the rights of children with disabilities. • Articles 1, 3, 5, 24, 26 Charter, • Article 24 UN CRPD
Funding	Total project budget: 193,254,981.32 EUR, ESF+
Actions taken	None taken
Project reference	6001626



Education segregation and institutionalisation

PROJECT 10 - CZECHIA, OSTRAVA

Location	Several localities, Czechia
Description	A “Children’s House” (residential childcare institution) is attached to primary school Na Vizine in Ostrava (https://www.domov-vizina.cz/). Most children in the facility are Roma. The school applied to European funds, presenting itself as an educational project. Another fifteen cases have been explored by a study (please insert reference) across the Czechia, where residential childcare institutions are administratively linked to segregated schools. Analysis of OP VVV programs in Olomouc, Ivancice, and Hamry na Jezeře found similar administrative structures.
Rights violated	Such an arrangement reinforces segregation and impedes the transition to community-based services, family life. Furthermore, it also strongly limits Roma children’s educational choices and perpetuating barriers to social inclusion. NGOs and experts have expressed concern that these administrative units benefit from EU funds under the objective banner of “educational support,” while deliberately reinforcing institutional care. • Art. 21 Charter
Funding	Total project budget: 3,905,087 CZK [156,328 EUR], ESF
Actions taken	None
Project reference	CZ.02.3.68/0.0/0.0/18_063/0011621



Institutionalisation

PROJECT 11 - POLAND, LODZ

Location	Lodz, Poland
Description	Innovative residential social care home for people with mental disorders. Transformation of the support system for people with psychosocial disabilities, renovation of the building
Rights violated	Institutionalisation of people with psychosocial disabilities. the facility is architecturally and functionally separated from the community. Lack of any measures to facilitate leaving the facility and living in an individual home. No choice provided to use of services in institutions/residential facilities or those provided at the community level. Limited opportunities provided for choice and independent living. Sharing assistants, and lack of control over daily decisions. • Art 21 Charter • Art 19 UN CRPD.
Funding	Total project budget: 9,635,879 PLN [2,272,613 EUR], ERDF
Actions taken	A <u>complaint</u> was sent by ENIL and Validity Foundation to the managing authority and the European Commission. The response did not recognise the fundamental rights violations, no action was taken by the responsible authorities. The European Commission has promised a separate response to the complaint, but the follow-up is unknown and the investment was made.
Project reference	<u>RPLD.07.03.00-10-0031/16-00</u>



PROJECT 12 POLAND, DRZEWICA

Location	Drzewica, Poland
Description	Extension and reconstruction of the Adult Social Care Home building
Rights violated	Institutionalisation of elderly, people with disabilities. Lack of any measures to facilitate leaving the facility and living in an individual home. No choice provided to use of services in institutions/residential facilities or those provided at the community level. Limited opportunities provided for choice and independent living. Sharing assistants, and lack of control over daily decisions. • Art 21 Charter • Art 19 UN CRPD
Funding	Total project budget: 11,450,776 PLN [2,700,654 EUR], ERDF
Actions taken	A complaint was sent by ENIL and Validity Foundation to the managing authority and the European Commission. The <u>response</u> did not recognise the fundamental rights violations, no action was taken by the responsible authorities.
Project reference	<u>RPLD.07.03.00-10-0018/16-00</u>



Zdjęcie nr 3. Plac budowy – nowy rozbudowywany parterowy budynek z zewnątrz



Zdjęcie nr 4. Plac budowy - nowy rozbudowywany budynek Domu Pomocy Społecznej.

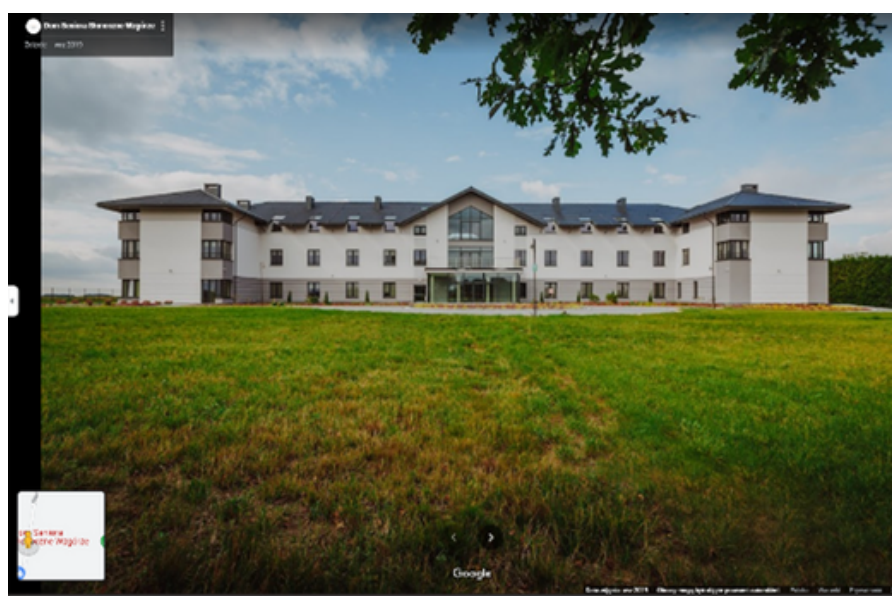
PROJECT 13 POLAND, KOLUMNA

Location	Kolumna, Poland
Description	Construction of a nursing home - Kolumna Senior Citizens' Home
Rights violated	Institutionalisation of elderly, people with disabilities. Lack of any measures to facilitate leaving the facility and living in an individual home. No choice provided to use of services in institutions/residential facilities or those provided at the community level. Limited opportunities provided for choice and independent living. Sharing assistants, and lack of control over daily decisions. • Art 21 Charter • Art 19 UN CRPD
Funding	Total project budget: 7,863,252 PLN [1,854,540 EUR], ERDF
Actions taken	A complaint was sent by ENIL and Validity Foundation to the managing authority and the European Commission. The <u>response</u> did not recognise the fundamental rights violations, no action was taken by the responsible authorities.
Project reference	<u>UDA-RPLD.07.03.00-10-0001/16-00</u>



PROJECT 14 POLAND, LODZ

Location	Lodz, Poland
Description	Construction of a Day Care and Rehabilitation Centre providing day care services together with the purchase of equipment necessary for the provision of social rehabilitation services and care for the elderly and people with disabilities.
Rights violated	Institutionalisation of elderly, people with disabilities. Lack of any measures to facilitate leaving the facility and living in an individual home. No choice provided to use of services in institutions/residential facilities or those provided at the community level. Limited opportunities provided for choice and independent living. Sharing assistants, and lack of control over daily decisions. • Art 21 Charter • Art 19 UN CRPD
Funding	Total project budget: 6,565,013 PLN [1,548,352 EUR], ERDF
Actions taken	A complaint was sent by ENIL and Validity Foundation to the managing authority and the European Commission. The <u>response</u> did not recognise the fundamental rights violations, no action was taken by the responsible authorities.
Project reference	<u>RPLD.07.03.00-10-0053/16-00</u>



PROJECT 15 POLAND, ROMANÓW

Location	Romanów, Poland
Description	Construction and equipping of the residential and care complex Romanów Senior Citizens' Home
Rights violated	Institutionalisation of elderly, people with disabilities. Lack of any measures to facilitate leaving the facility and living in an individual home. No choice provided to use of services in institutions/residential facilities or those provided at the community level. Limited opportunities provided for choice and independent living. Sharing assistants, and lack of control over daily decisions. • Art 21 Charter • Article 19 UN CRPD
Funding	Total project budget: 18 291 090,85 PLN [4,313,936 EUR], ERDF
Actions taken	A complaint was sent by ENIL and Validity Foundation to the managing authority and the European Commission. The <u>response</u> did not recognise the fundamental rights violations, no action was taken by the responsible authorities
Project reference	<u>RPLD.07.03.00-10-0014/18-00</u>



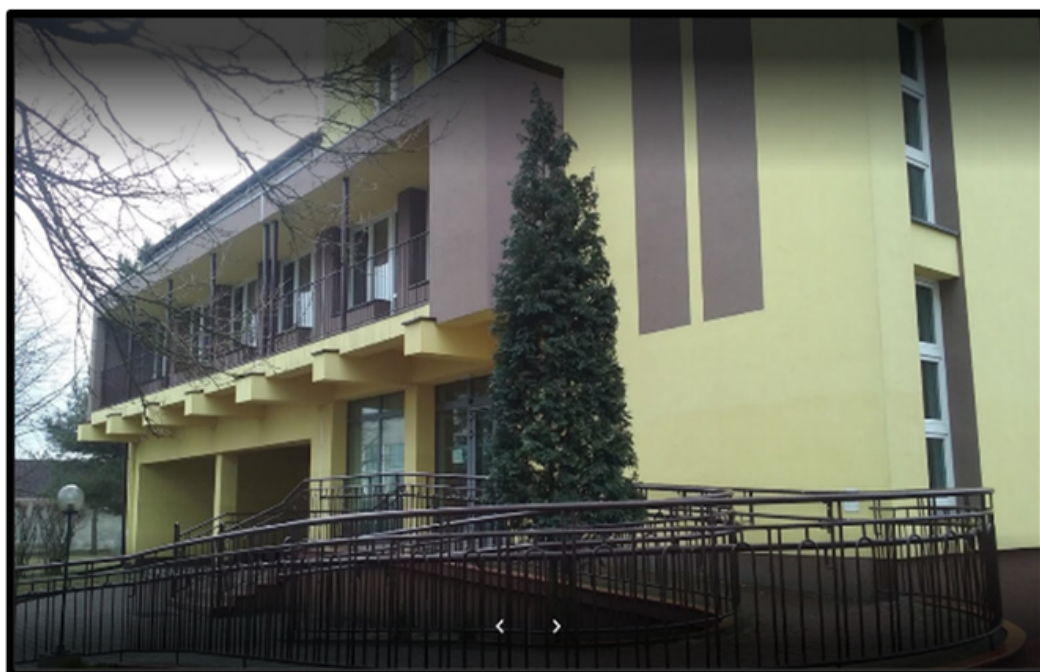
PROJECT 16 POLAND, DRZYKOZY

Location	Drzykozy, Poland
Description	Adaptation and extension of the existing building in Drzykozy to accommodate the provision of social welfare services and the purchase of equipment for the facility.
Rights violated	Institutionalisation of elderly, people with disabilities. Lack of any measures to facilitate leaving the facility and living in an individual home. No choice provided to use of services in institutions/residential facilities or those provided at the community level. Limited opportunities provided for choice and independent living. Sharing assistants, and lack of control over daily decisions. • Art 21 Charter • Art 19 UN CRPD
Funding	Total project budget: 8,905,797 PLN [2,100,423 EUR], ERDF
Actions taken	A complaint was sent by ENIL and Validity Foundation to the managing authority and European Commission. The <u>response</u> did not recognise the fundamental rights violations, no action was taken by the responsible authorities.
Project reference	<u>RPLD.07.03.00-10-0009/18-00</u>



PROJECT 17 POLAND, LODZ

Location	Lodz, Poland
Description	Thermomodernisation of the Social Welfare Home. Lack of any measures to facilitate leaving the facility and living in an individual home. No choice provided to use of services in institutions/residential facilities or those provided at the community level. Sharing assistants, and lack of control over daily decisions
Rights violated	Institutionalisation of elderly, people with disabilities. • Art 21 Charter • Art 19 UN CRPD
Funding	Total project budget: 2,423,176 PLN [2,100,423 EUR], ERDF
Actions taken	A complaint sent by ENIL and Validity Foundation to the managing authority was the European Commission. The <u>response</u> did not recognise the fundamental rights violations, no action was taken by the responsible authorities.
Project reference	<u>RPLD.04.02.02-10-0004/16-00</u>



PROJECT 18 POLAND, RĄBIEŃ

Location	Rąbień, Poland
Description	Thermomodernisation of the Nursing Home buildings in Rąbień. Lack of any measures to facilitate leaving the facility and living in an individual home. No choice provided to use of services in institutions/residential facilities or those provided at the community level. Sharing assistants, and lack of control over daily decisions
Rights violated	Institutionalisation of elderly, people with disabilities. • Art 21 Charter • Art 19 UN CRPD
Funding	Total project budget: 3,220,711 PLN [759,601 EUR], ERDF
Actions taken	A complaint was sent by ENIL and Validity Foundation to the managing authority and the European Commission. The <u>response</u> did not recognise the fundamental rights violations, no action was taken by the responsible authorities.
Project reference	<u>RPLD.04.02.02-10-0072/16-00</u>



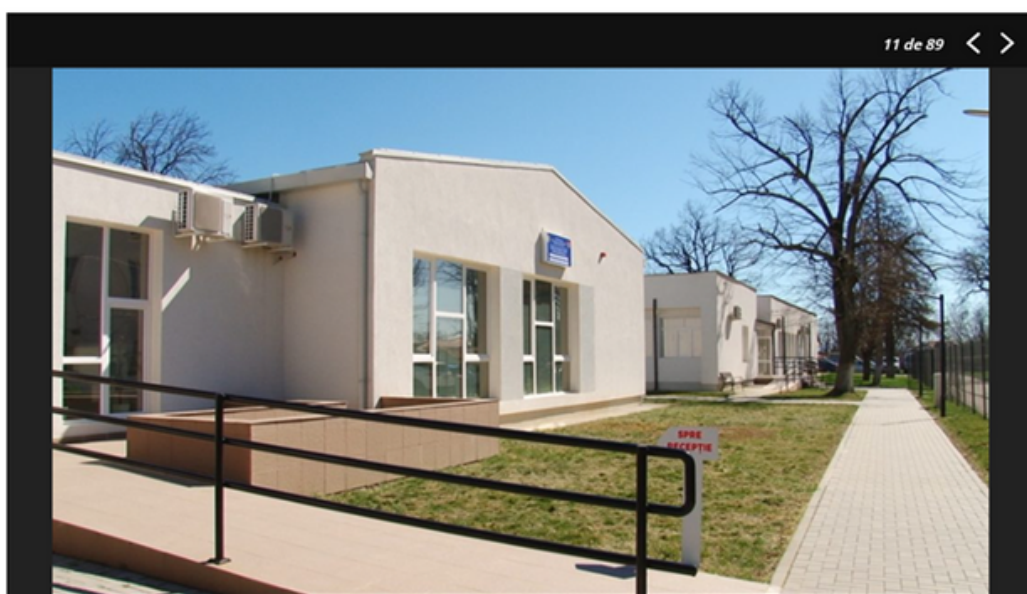
PROJECT 19 ROMANIA, TIMIS COUNTY

Location	Periam, Timis County, Romania
Description	Contrary to instructions by the European Commission not to build small groups homes, the project built three new small group homes and rehabilitated a Day Care Center. The houses are built at the margins of a small locality. Across the street there is a residential institution with 50 persons with disabilities residing. Together with the small group homes, it is likely that approximately 100 persons with disabilities will be concentrated in a small area on the margins of the city.
Rights violated	Institutionalisation of people with disabilities. • Art 21 Charter • Article 19 UN CRPD
Funding	Total project budget: 5,834,858 lei [1,144,089 EUR], ERDF
Actions taken	The <u>Center for Legal Resources</u> reported to the national and European authorities several cases of EU funds support for small group homes across Romania, including this case.
Project reference	“Building 3 small group homes and rehabilitation of a Day Care Center’ (<u>Cod SMIS – 119772</u>)



PROJECT 20 ROMANIA, TIMIS COUNTY

Location	Lugoj, Timis County, Romania
Description	Contrary to instructions by the European Commission not to build small groups homes, this project built 2 small group homes and renovated a Day Care Center.
Rights violated	Institutionalisation of children with disabilities. • Art 21 Charter • Article 19 UN CRPD
Funding	Total project budget: 12,693,966.56 lei [2,489,013 EUR], ERDF
Actions taken	The Center for Legal Resources reported to the national and European authorities several cases of EU funds support for small group homes across Romania, including this case.
Project reference	"Building 2 small group homes and rehabilitation of a Day Care Center" (SMIS code 119770)

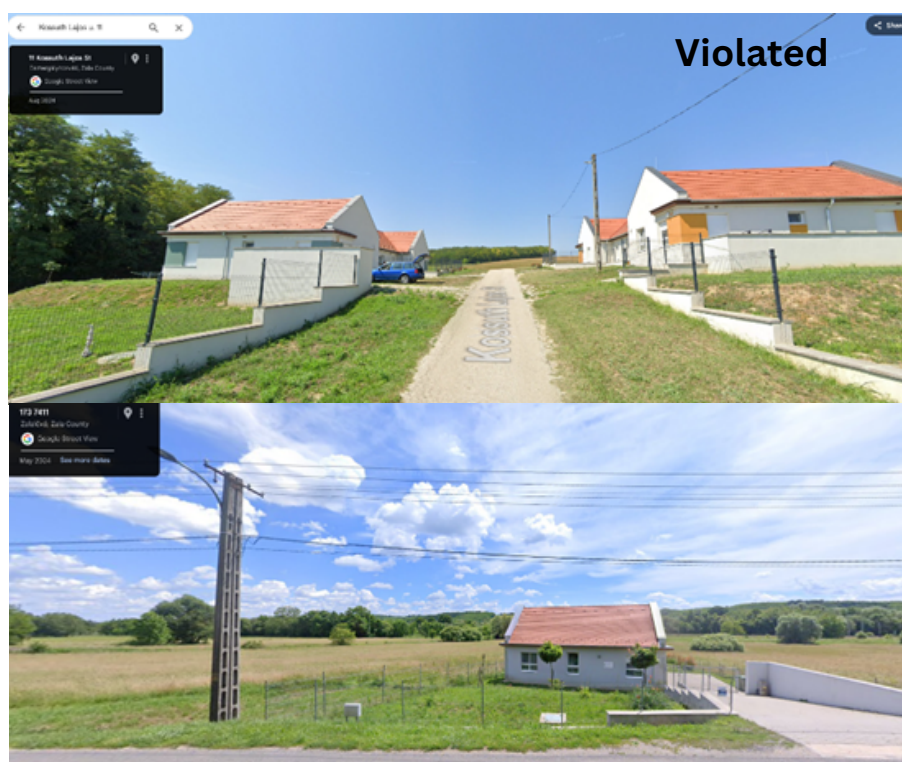


PROJECT 21 ROMANIA, TULCEA COUNTY

Location	Smardan, Tulcea County, Romania
Description	The project aimed to build 3 small group homes and renovate a building which was transformed into a Day Care Center. Houses are situated in the outskirts of the city.
Rights violated	Institutionalisation of persons with disabilities. • Art 21 Charter • Art 19 UN CRPD.
Funding	Total project budget: 3,447,255 lei [675,932 EUR], ERDF
Actions taken	The <u>Center for Legal Resources</u> reported to national and European authorities several cases of EU funds support for small group homes across Romania, including this case.
Project reference	"Integrated social services through the deinstitutionalization of adults with disabilities and the creation of the Smârdan day center with 3 sheltered homes" (<u>SMIS Code: 120109</u>)

PROJECT 22 HUNGARY, BUCSUSZENTLASZLO

Location	Bucsuszentlaszlo, Hungary
Description	The <u>project</u> aimed to replace the institutional care of the Zala County Fagyöngy Unified Social Institution. As a result, 72 psychiatric patients were accommodated in a new small-scale institutions.
Rights violated	According to a <u>Federation of Associations of Persons with Physical Disabilities (MEOSZ) analysis</u>, the built infrastructure is located in the periphery of the settlement, with limited public transportation options, no general practitioner or pharmacy available in the vicinity. Residents thus face serious challenges to enjoy independent living. • Art 26 Charter • Art 19 UN CRPD
Funding	Total project budget: 781,307,359 HUF [1,929,582 EUR], ERDF
Actions taken	None
Project reference	<u>EFOP-2.2.2-17-2017-00028</u> - Replacement of a religious house in Búcsúszentlászló



PROJECT 23 HUNGARY, KASKANTYU

Location	Kaskantyu, Hungary
Description	The <u>project</u> aimed at replacing residential care for more than 50 people with community-based forms of care. It included the creation of the construction of 10, barrier-free small groups homes for seven to twelve people.
Rights violated	According to a Federation of Associations of Persons with Physical Disabilities (MEOSZ) <u>analysis</u>, the built infrastructure is located in the periphery of the settlement, with limited public transportation options, no general practitioner or pharmacy available in the vicinity. Residents thus face serious challenges to enjoy independent living. • Art 26, Charter • Art 19, UN CRPD
Funding	Total project budget: 630,000,000 HUF [1,555,901 EUR], ERDF
Actions taken	None
Project reference	<u>EFOP-2.2.2-17-2017-00016 -Harmony in supported housing</u>

PROJECT 24 HUNGARY, PASZTORI

Location	Pasztori, Hungary
Description	The project aimed at replacing residential care for more than 50 people with community-based forms of care. It included the creation of the construction of 10 small groups homes for seven to twelve people.
Rights violated	According to a Federation of Associations of Persons with Physical Disabilities (MEOSZ) <u>analysis</u>, the built infrastructure is located in the periphery of the settlement, with limited public transportation options, no general practitioner or pharmacy available in the vicinity. Residents thus face serious challenges to enjoy independent living. • Art 26 Charter • Art 19 UN CRPD
Funding	Total project budget: 892,500,000 HUF [2,204,193 EUR], ERDF
Actions taken	None
Project reference	<u>EFOP-2.2.2-17-2017-00010</u> - Deinstitutionalisation in Pásztori

PROJECT 25 HUNGARY, SEVERAL LOCALITIES

Location	Several localities in Hungary
Description	The call for proposal aimed at construction of small groups homes for seven to twelve people across Hungary.
Rights violated	35 group homes were created for 6 and 12 people, where the conditions for independent living are not ensured. Instead, the institutional treatment of people with disabilities has been continued. • Art 26 Charter • Art 19 UN CRPD
Funding	Total call budget: 25,000,000,000 HUF [61,742,115 EUR], ERDF
Actions taken	Validity Foundation submitted complaint to the European Commission. In its reply the Commission underlined that they found no evidence of misuse of EU funds and incompatibility with the CRPD. The call for proposal and the complaint was also <u>reported</u> to the UN CRPD committee.
Project reference	EFOP-2.2.25-22

PROJECT 26 HUNGARY, MÁTÉSZALKA COUNTY

Location	Géberjén, Fülöpösdaróc and Nagyecsed (Mátészalka county), Hungary
Description	The project aimed at replacing residential care for 60 psychiatric patients with new supported housing places. It included the construction of small groups homes in Géberjén, Fülöpösdaróc and Nagyecsed.
Rights violated	According to a Federation of Associations of Persons with Physical Disabilities (MEOSZ) <u>analysis</u>, the built infrastructure is located in the periphery of the settlement, with limited public transportation options, lack of general practitioner or pharmacy in the close proximity. Residents thus face serious challenges to enjoy independent living. • Art 26, Charter • Art 19, UN CRPD
Funding	Total project budget: 525,000,000 HUF [1,296,584 EUR], ERDF
Actions taken	None
Project reference	<u>EFOP-2.2.2-17-2017-00027 - Development of supported housing in the Mátészalka District</u>

PROJECT 27 BULGARIA, SEVERAL LOCALITIES

Location	Several localities, Bulgaria
Description	This project aims to build infrastructure, provide equipment, and furnish 14 centres for residential health and social services for children: 9 centres for children with disabilities needing constant medical care, and 5 centres for children with high-risk behaviour requiring specialized health care.
Rights violated	Institutionalisation and segregation of children with disabilities, isolation from community, deprivation from family life and liberty. Trans-institutionalisation of the children with disabilities (moving individuals including children, from one institution to another, even when the new facility is presented as "community-based," smaller in size, or offering better conditions). • Art. 4, 7, 14, 21, 24, 26, 33, Charter • Art 19, UN CRPD • Art 26, UN CRC
Funding	Total project budget: 7,000,000 BGN [3,571,428 EUR], ERDF
Actions taken	None
Project reference	<u>BG16RFOP001-5.001-0003-C05</u> : "Building an infrastructure for the provision of specialized health and social care for children with disabilities"

PROJECT 28 BULGARIA, SEVERAL LOCALITIES

Location	Several localities, Bulgaria
Description	The project build four Centers for specialized health and social care for children with disabilities in need of constant medical care and one center for specialized health and social care for children with high-risk behavior and need for special health care.
Rights violated	Institutionalisation and segregation of children with disabilities, isolation from community. Deprivation from parental care, deprivation from liberty (trans-institutionalisation). The construction of these new facilities, while potentially offering improved conditions compared to existing institutions, fundamentally perpetuates the model of residential care, rather than promoting community-based alternatives as outlined in national deinstitutionalization strategies. • Art 4, 7, 14, 21, 24, 26, 33, the Charter • Art 19 UN CRPD • Article 26, UN CRC
Funding	Total project budget: 3,359,184 BGN [1,713,869 EUR], ERDF
Actions taken	None
Project reference	<u>BG16RFOP001-5.001-0054-C05</u> - Construction of infrastructure for the provision of specialized health and social care for children with disabilities-2



PROJECT 29 BULGARIA, SEVERAL LOCALITIES

Location	Several localities, Bulgaria
Description	The project aimed to assess the individual needs of children and youth in residential care, evaluate parental capacity, identify children with disabilities requiring specialized medical care, and develop individualized care plans to facilitate their transition to family-based or community-based settings.
Rights violated	Institutionalisation and segregation of children with disabilities and/or deprived from family care; isolation from community. Deprivation from parental care, deprivation from liberty (trans-institutionalisation). • Art. 4, 7, 21, 24; 26 Charter • Art. 19 UN CRPD • Art. 26, UN CRC
Funding	Total project budget: 2,011,153 BGN [1,026,098 EUR], ERDF
Actions taken	None
Project reference	<u>BG05M9OP001-2.012-0001--C04</u> - Continuing Support for the Deinstitutionalisation of Children and Youth

PROJECT 30 BULGARIA, VRATSA

Location	Vratsa, Bulgaria
Description	The project supported the preparation and conduct of public procurement, selection and recruitment of staff, activities on relocation of children and youth from the target group and their placement in the newly opened services, training and supervision of staff, provision of social services "Family type accommodation centre for children", "Transitional housing for children aged 15-18 years", "Supervised housing for young people aged 18-21 years", "Day Support Centre for Children and/or Young People with Severe Disabilities".
Rights violated	This project aims to ensure the salaries of the personnel in a group homes and social services in Vratsa. The project to illustrate the link between EU funding and placement of Roma children in institutions, reinforcing Roma segregation and discrimination. Despite the lack of official data, estimates from professionals working in the field suggest a significant over representation of Romani children in the Bulgarian childcare system. While Roma account for just over 10% of the population, estimates indicate that they comprise between 30% and 85% of children in institutional care. • Art. 14, 21, the Charter of Fundamental Rights
Funding	Total project budget: 2,019,298 BGN [1,030,254 EUR], ERDF
Actions taken	None
Project reference	<u>BG16RFOP001-5.001-0049 - New Opportunity for Children and Youth in Vratsa Municipality.</u>

PROJECT 31 BULGARIA, DRYANOVO

Location	Dryanovo, Bulgaria
Description	The project aims to build a complex of centers for care for people with psycho-social disabilities, as follow: 7 buildings in one yard. The total capacity of the complex is 105 persons.
Rights violated	The project supports so called process of deinstitutionalisation, which is in reality a process of trans-institutionalisation of the persons with disabilities. It includes building smaller residential facilities rather than community support systems, which represents systemic failure to prioritise the rights of adults with disabilities and to ensure their full enjoyment of human rights, independent living. • Art. 1, 6, 7, 15, 21, Charter • Article 19 UN CRPD
Funding	Total project budget: 3,772,707 BGN [1,924,850 EUR], ERDF
Actions taken	In Case 73/2025, individuals with disabilities at risk of institutionalization appealed guidelines under the BG16RFOP001-5.002 program, but the Supreme Administrative Court dismissed their case due to lack of legal standing. A dissenting judge argued for substantive consideration of rights violations under the UN CRPD, EU law, and national legislation. Separately, NGOs (ENIL, Validity Foundation, CIL) brought <u>Case T-613/19</u> before the CJEU in 2019, challenging the European Commission's refusal to halt funding for discriminatory institutionalization projects. Though unsuccessful, the case highlighted systemic justice access barriers.
Project reference	<u>BG16RFOP001-5.002-0018-C01 - Building a complex for care for persons with mental disorders in Dryanovo</u>



PROJECT 32 GREECE, NORTHERN AEGEAN

Location	Northern Aegean
Description	<u>Creation of new Supported Living Houses</u> (2 units)
Rights violated	While Supported Living Homes (SLHs) intended to support deinstitutionalization and community living for persons with disabilities, they present limitations in choice and autonomy, potentially hindering the realisation of independent living as outlined in the UNCRPD. • Art 1, 3, 5, 26 Charter • Art 19 UN CRPD
Funding	Total project budget: 1,000,000 EUR, ESF+
Actions taken	None
Project reference	<u>Call Code BA EKT 4.11.16 / A/A ΟΠΣ 11333</u>



PROJECT 33 GREECE, CRETE

Location	Crete, Greece
Description	<u>Creation of new Supported Living Houses</u> (5 units)
Rights violated	While Supported Living Homes (SLHs) intended to support deinstitutionalization and community living for persons with disabilities, they present limitations in choice and autonomy, potentially hindering the realisation of independent living as outlined in the UNCRPD. • Art 1, 3, 5, 26 Charter • Art 19 UN CRPD
Funding	Total project budget: 3,700,000 EUR, ESF+
Actions taken	None
Project reference	<u>Call Code EKT+ 19 / A/A ΟΠΣ 12155</u>



PROJECT 34 GREECE, SOUTHERN AEGEAN

Location	Southern Aegean, Greece
Description	<u>Creation of new Supported Living Houses</u> (3 units)
Rights violated	While Supported Living Homes (SLHs) intended to support deinstitutionalization and community living for persons with disabilities, they present limitations in choice and autonomy, potentially hindering the realisation of independent living as outlined in the UNCRPD. • Art 1, 3, 5, 26 Charter • Art 19 UN CRPD
Funding	Total project budget: 2,000,000 EUR, ESF+
Actions taken	None
Project reference	<u>Call Code 54 Δ.5.11γ / Α/Α ΟΠΣ 12334</u>

Housing segregation

PROJECT 35 - ROMANIA, ARAD

Location	Arad, Romania
Description	The project aimed to revitalise Mărului and Sabinelor Streets, located on the western periphery of the city, along the banks of the River Mureș. These streets lacked public utilities, but 84 families had built their own small houses—mostly using masonry, though some relied on recycled materials. As part of the project, a new park was developed.
Rights violated	Although it was stated during the planning of the new park that the houses would not be demolished, the entire Roma community living there was forcibly evicted on very short notice. Their homes were demolished without allowing residents the opportunity to recover their belongings. In several cases, houses were torn down while the owners were at work. The eviction was justified on the grounds that the properties were informal: the land belonged to the municipality, and none of the homes had legal building permits. • Art 21 Charter
Funding	Total project budget: 5,500,000 EUR, ERDF
Actions taken	The Policy Center for Roma and Minorities conducted interviews with representatives of the Roma community, the municipality, and other relevant stakeholders. Further clarification and collection of legal evidence is necessary in order to formulate a formal complaint.
Project reference	“Revitalizarea Zonei Strada Mărului și Amenajarea ca Zonă de Agrement” (Code SMIS 127360)



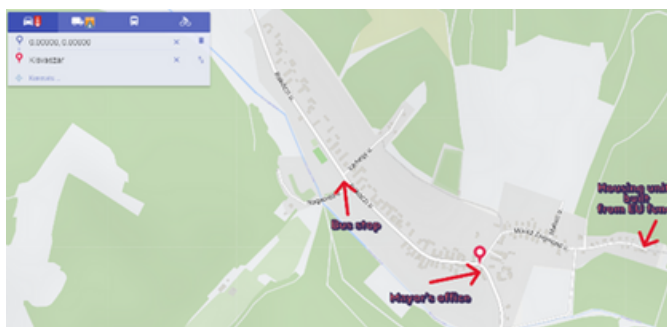
PROJECT 36 ROMANIA, SLOBOZIA

Location	Slobozia, Romania
Description	Building social housing complex “Bora” (together with a social cantina and road refurbishment). (Community-led Local Development (CLLD))
Rights violated	The compound is situated at the very edge of the city and of the Bora neighbourhood, far from any public service. The houses are built of shipyard containers, only suitable for temporary housing. The houses do not meet the minimum requirements for thermal insulation, sound insulation, surface and sanitary equipment. These conditions hampers the possibility of any sort of long-term social and economical development and it will affect primarily the children. • Art 21 Charter
Funding	Total project budget: 18,621,708.97 lei [3,651,315 EUR] ERDF
Actions taken	The Policy Center for Roma and Minorities conducted interviews with representatives of the Roma community, municipality, etc. The legal proofs, evidence should be further clarified in order to formulate a complaint.
Project reference	“Building social complex “Bora” (together with a social cantina and road refurbishment)” (SMIS code 155429)



PROJECT 37 HUNGARY, KISVASZAR

Location	Kisvaszar, Hungary
Description	The project aimed at initiating and reinforcing desegregation processes, planning the construction of new social housing.
Rights violated	Houses are built at the edge of the village far from the available public services (kindergarten, bus stop, etc.). According to several articles, <u>evidence</u>, the project did not contribute to desegregation as opposed to its initial aim. • Art 7, 21 Charter
Funding	Total project budget: 199,701,146 HUF [493,198 EUR], ERDF
Actions taken	A <u>complaint</u> has been submitted to the Ombudsman Office in 2021. No response was received to date.
Project reference	<u>EFOP-2.4.1-16-2017-00009</u> - With you - For you - Housing sub-project to tackle segregated living situations



PROJECT 38 HUNGARY, KÖRÖM

Location	Köröm, Hungary
Description	A complex programme was initiated in the most socially deprived part of the Miskolc area, refurbishing the physical environment and reinforcing the human capacity, together with housing interventions
Rights violated	The project contributed to further segregation of the Roma community as opposed to its initial aim. • Art 21 Charter
Funding	Total project budget: 200,000,000 HUF [493,936 EUR], ERDF
Actions taken	A <u>complaint</u> was submitted to the Ombudsman Office in 2021. No response was received to date.
Project reference	<u>TOP-6.7.1-16-NY1-2017-00001 – Social urban regeneration in segregated areas of Nyíregyháza</u>

PROJECT 39 HUNGARY, HAJDUHADHAZ

Location	Hajduhadhaz, Hungary
Description	The aim of the project was to stop and reverse the processes of deprivation in the run-down part of Hajdúhadház, by raising the status of the area and improving the living conditions of the people living in the Roma settlement.
Rights violated	The local government planned to evict 12 Roma families, more than 80 residents, including over 50 children. The evictions were found to be in violation of both EU and Hungarian laws. Families were relocated to distant settlements, sometimes over 100 kilometres away. The actions could have <u>violated</u> the Child Protection Act, parents were concerned that housing problems could lead to institutionalisation of their children. • Art 21 Charter
Funding	Total project budget: 1,726,000,000 HUF [4,262,675 EUR], ERDF
Actions taken	Complaint was been submitted to the European Commission, which initiated consultations with Hungarian authorities, including the Ministry of the Interior and the Municipality of Hajdúhadház. The Deputy Ombudsman for National Minorities also investigated the case. Following the instructions of the European Commission, the municipality of Hajdúhadház provided temporary accommodation for the families and ensured that families can move back to their apartments after the renovation.
Project reference	<u>TOP-4.3.1-16-HB1-2020-00017 - Rehabilitation of degraded urban areas in Hajdúhadház</u>

PROJECT 40 BULGARIA, SLIVEN

Location	Sliven, Bulgaria
Description	The project aims to create a "Center for Temporary Accommodation of Homeless Persons", which will provide social services for homeless persons for a period of up to 3 months within the calendar year, aimed at meeting their daily needs.
Rights violated	The project seemingly addressing the needs of vulnerable groups, the project's focus on constructing a new homeless shelter and a crisis centre for victims of gender-based violence, without addressing the underlying causes of homelessness or spatial segregation, demonstrates a fundamental lack of understanding of the complex needs of marginalized groups. The shelter provides temporary housing for 20 individuals, the absence of accompanying support services to address the factors leading to homelessness renders the project ineffective and keeping the vulnerable people in the circle of poverty and homelessness of Roma communities. • Art. 21, 34, Charter
Funding	Total project budget: 1,861,086 BGN [949,534 EUR], ERDF
Actions taken	None
Project reference	<u>BG16RFOP001-1.015-0005 - Construction of municipal infrastructure for the provision of social services</u>



PROJECT 41 BULGARIA, MONTANA

Location	Montana, Bulgaria
Description	The project objective is the renovation of social housing, including improving access for persons with disabilities. The project consists of the renovation of 22 social houses.
Rights violated	Roma families do not have access to houses in non-segregated areas and the project does not address the root causes of the housing segregation, including ensuring equal access to essential services for Roma communities and to combat discriminatory housing policies. • Art. 21, 34, Charter
Funding	Total project budget: 718,184 BGN [366,420 EUR], ERDF
Actions taken	None
Project reference	<u>BG16RFOP001-1.026-0003 - Provision of modern social housing for vulnerable groups in the territory of the residential area of Montana, district Mladost</u>



PROJECT 42 BULGARIA, PLOVDIV

Location	Plovdiv, Bulgaria
Description	The project aimed to build social houses in Plovdiv, Vladaya str 6.
Rights violated	The new social housing development was constructed between a pre-existing segregated Roma settlement and an industrial zone. The area lacks adequate infrastructure, and at the time of this report, the building remains unoccupied. The spatial placement of the housing, combined with the absence of necessary infrastructure, reinforces the social and physical isolation of the Roma community. This arrangement limits their access to essential services, employment opportunities, and broader social integration. The approach perpetuates segregation rather than promoting inclusion, raising concerns regarding discriminatory urban planning and the right to adequate housing and social assistance. • Art. 21, 34, Charter
Funding	Total project budget: 9 274 578.02 BGN [4,731,927 EUR], ERDF
Actions taken	None
Project reference	<u>BG16RFOP001-1.003-0006 - Building social houses in Plovdiv</u>



PROJECT 43 CZECHIA, KLADNO

Location	Kladno, Czechia
Description	The municipality of Kladno introduced a local decree in 2017, which severely limited access to social and housing benefits in the whole territory of Kladno ("no-supplement zone"). The Regional Authority of the Central Bohemian Region annulled this decree on March 14, 2025. As a result, the city will now be required to identify specific locations where new residents will be ineligible for housing supplements, while those already living in the affected areas will retain their benefits. Due to the decree high number of families lost their homes and became homeless overnight. Even though the decree was eventually declared invalid, no compensation was provided to the victims. The municipality of Kladno implemented projects funded by EU funds at the time when the local decree was still in place.
Rights violated	These projects aimed at integration of Roma communities, but simultaneously enforced unlawful practices, which represented discriminative practices against Roma and other socially vulnerable groups. In this way, EU funded measures indirectly supported discriminative practices. • Art. 21 Charter
Funding	ESF – total amount cannot be specified
Actions taken	None
Project reference	CZ. 03.2.63/0.0/0.0/15_017/0003527

PROJECT 44 CZECHIA, USTI NAD LABEM

Location	Usti nad Labem, Czechia
Description	The municipality of Usti and Labem implemented several projects aimed at Roma integration with the support of ESF+, and Resilience and Recovery Funds
Rights violated	In the scope of these project, Roma families were relocated from central urban areas to segregated parts of the city, with limited access to essential services, such as education, and employment. No desegregation measures were implemented; instead, newly vacated central areas were redeveloped for commercial or high-income housing. This approach violates rights for decent quality housing, represent discriminative treatment and hinders integration of Roma communities in the mainstream society. • Art. 21 Charter
Funding	Total project budget: 1,032,431 CZK [41,330 EUR], ESF
Actions taken	None
Project reference	CZ.03.2.63/0.0/0.0/16_063/0006583

Housing and educational segregation

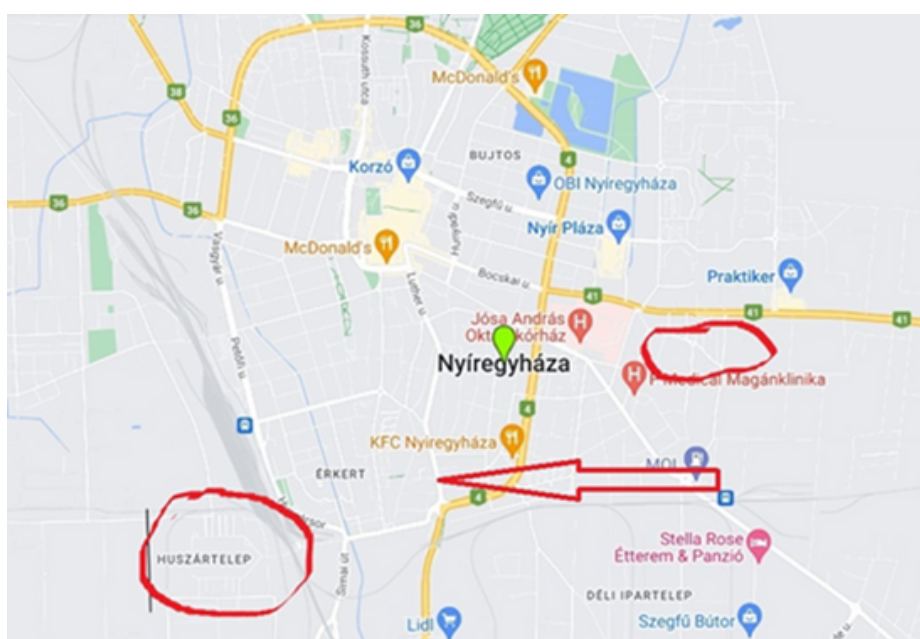
PROJECT 45 ROMANIA, SFANTU GHEORGHE

Location	Sfantu Gheorghe, Romania
Description	This Community-led Local Development (CLLD) project build segregated housing and kindergarten in Orko community, Sfantu Gheorghe.
Rights violated	New houses are built for Roma families in the segregated neighbourhood Orko, at the outskirt of the city Sfantu Gheorghe. A kindergarten is built for 85 Roma children in the centre of the segregated neighbourhood. In a close proximity another non-segregated kindergarten is available, where the capacity could have been extended. The segregated situation of the Roma community is reinforced by the EU funds investments. • Art 21 Charter
Funding	Total project budget: 3,000,000 EUR, ERDF
Actions taken	The Policy Center for Roma and Minorities conducted interviews with representatives of the Roma community, municipality, etc. The legal proofs, evidence should be further clarified in order to formulate a complaint.
Project reference	Project title (SMIS Code: <u>144907</u>)



PROJECT 46 HUNGARY, NYIREGYHAZA

Location	Nyiregyhaza, Hungary
Description	The basic objective of the project was to improve the living conditions of people living in deprived urban areas of Nyiregyhaza through the renewal of physical infrastructure. It included improved housing conditions, community development, equal access to high quality social, health and other public services.
Rights violated	The project objective was to relocate the residents of Keleti-telep (East Settlement) of the city Nyiregyhaza. Families were moved to another segregated neighbourhood (Huszár-telep). The number of residents in the segregated neighbourhood and the students in the segregated school significantly increased. So, the project and the EU funds support were used to reinforce segregation instead of decreasing it. • Art 21 Charter
Funding	Total project budget: 1,726,000,000 HUF [4,262,675 EUR], ERDF
Actions taken	A complaint was submitted to the European Commission. After investigating the project, the European Commission concluded that the project constituted discrimination in the field of housing and educational segregation. As a result, the EU funds support has not been reimbursed for the municipality of Nyiregyhaza, all costs were covered by the budget of the local authority (see here).
Project reference	<u>Social urban regeneration in segregated areas of Nyiregyhaza</u>



PROJECT 47 HUNGARY, 300 SETTLEMENTS

Location	300 segregated settlements, villages, inhabited mainly by Roma communities, Hungary
Description	The project aims to improve the living conditions of 300 most disadvantaged, segregated settlements/villages, with high share of Roma communities (reaching also 100%). Particular attention was paid to children, and to reduce the negative effects of poverty. It includes intensive, complex social work based on the so called 'Presence Methodology', by providing services and tools to support families and childcare, community-building activities.
Rights violated	As part of the planned activities, the project aims to build or renovate 1000 housing units for social housing. The social housing activities include construction and renovation in segregated areas and will not support desegregation, rather reinforce segregation of Roma communities. • Art 21 Charter
Funding	Total project budget: 70,441,689,150 HUF [173,968,756 EUR], ESF+
Actions taken	Since its inception, the program has been heavily scrutinized by Roma and pro-Roma NGOs. Their main criticism is that the program lacks any evaluation or impact assessment available to the public and implementing partners that are mainly faith-based charities selected in non-transparent manner. Furthermore, the impact on strengthening segregation requires more analysis and formulation of complaints.
Project reference	<u>EFOP-PLUSZ-7.1.1-24-2024-00002</u> - Presence in the catching-up settlements. The "Catching-up settlements" (Felzárkózó települések - FETE in Hungarian), Government Decision 1057/2021 (19.II.)

Reception

PROJECT 48 - BULGARIA, SOFIA

Location	Sofia, Bulgaria
Description	The project aimed to renovate and enhance security in reception facilities managed by the State Agency for Refugees (SAR).
Rights violated	Reports from <u>NGOs</u> and the National Preventive Mechanism (NPM) under the <u>Ombudsman</u> reveal that conditions in many centers remain well below minimum standards. These include inadequate infrastructure, poor hygiene, and a lack of psychological support. As a result, residents face overcrowding, increased vulnerability to exploitation, and inhuman or degrading treatment. The absence of appropriate facilities for unaccompanied children is particularly alarming. Although the project focused on material improvements, it failed to address the underlying systemic issues contributing to these conditions. The continued lack of progress – despite previous funding and recommendations—raises serious concerns about the effectiveness and implementation of EU-funded projects in ensuring safe and dignified reception conditions. • Art. 1, 4, 7, 21, 24 Charter
Funding	Total project budget: 5,867,400 BGN [2,993,571 EUR], AMIF
Actions taken	None
Project reference	<u>BG65AMPR001-1.001-0004</u> - Provision of funds to improve the accommodation and security conditions in the "Special Home for Temporary Accommodation of Foreigners - Sofia

PROJECT 49 BULGARIA, SOFIA

Location	Reception facilities in Sofia, Bulgaria
Description	The project aims to transfer children and adults between different reception facilities. One of the locations where children may be moved is the so-called "safe zones" within reception centres in Sofia.
Rights violated	As in many similar cases, the positive intention behind the project is undermined by unresolved systemic issues. While these "safe zones" offer better conditions than other areas, their limited capacity means that many unaccompanied children continue to be housed in mixed settings without adequate support or protection—even in the largest facility in Harmanli. This situation highlights the ongoing failure to provide appropriate care for unaccompanied children, a problem that is particularly pressing given the rising number of such children seeking protection in Bulgaria. • Art. 7, 21, 24, Charter
Funding	Total project budget: 3,819,677 BGN [1,948,815 EUR], AMIF
Actions taken	None
Project reference	<u>BG65AMNP001-5.001-0001</u> - Transfer and resettlement

PROJECT 50 SAMOS, KOS, LEROS, CHIOS AND LESVOS, GREECE

Location	Samos, Kos, Leros, Chios and Lesvos, Greece
Description	After the fire in Moria camp in September 2020, 'Multi-Purpose Reception and Identification Centres' (MPRICs) were built, aimed at the identification, first reception and pre-removal detention of and for asylum seekers.
Rights violated	Civil society organisations have been raising concerns about the extremely remote locations and poor conditions in the MPRICs and the impact on the fundamental rights, livelihoods and health of residents. > Art. 4, 6, 16 24, Charter
Funding	Total project budget: 276 000 000 EUR, AMIF and ISF
Actions taken	The European Ombudsman opened a strategic inquiry (OI/3/2022/MHZ) in the European Commission's role in relation to the MPRICs in July 2022. On 7 June 2023 the Ombudsman issues its <u>decision</u> where it found that Commission has a duty to ensure that EU-funded initiatives uphold fundamental rights. The Ombudsman's inquiry identified issues with how the Commission has complied with its duty to ensure the MPRICs comply with fundamental rights standards. Given the concerns, including with regard to the detention-like nature of the facilities in MPRICs, the Ombudsman suggested that the Commission carry out a fundamental rights impact assessment of the centres, with a view to identifying measures to mitigate any potential risks. The Commission should then publish this assessment. The Ombudsman's inquiry also led to suggested improvements to the transparency of the Task Force on Migration Management, which was set up by the Commission to improve conditions and end overcrowding in migrant reception centres.
Project reference	European Commission website, <u>Migration Management in Greece</u>



PROJECT 51 GREECE

Location	Territory of Greece
Description	Strengthening the infrastructure of the Reception and Identification Service (RIS) with integrated digital systems, in order to ensure the safe and smooth operation of its regional services (accommodation facilities for third country nationals) and their centralised operational control, both by RIS and the other relevant Ministries.
Rights violated	The project was found to be in breach of GDPR by the competent Personal Data Protection Authority (DPA). In April 2024, the DPA decided to issue a € 175,000 fine to the Ministry of Migration and Asylum. The fine concerns the deployment of the “Centaur” and “Hyperion” systems, with the former being a high-tech security management system, and the latter concerning the controlled entry-exit of residents of the camps. • Art. 7, 8, Charter
Funding	Total project budget: 9,012,625 EUR, RRF
Actions taken	Complaint submitted to the Data Protection Authority (DPA) in February 2022 by the organisations Homo Digitalis, Hellenic League for Human Rights and HIAS Greece, alongside Academic Niovi Vavoula, triggering the DPA's investigation.
Project reference	<u>Action: 3.4.8 (16763).</u>



PROJECT 52 GREECE

Location	Greece
Description	Supply, installation and support of the operation of the control system at the regional offices of the Reception and Identification Service of the Ministry of Migration and Asylum.
Rights violated	The project was found to be in breach of GDPR by the competent Personal Data Protection Authority (DPA). In April 2024, the DPA decided to issue a € 175,000 fine to the Ministry of Migration and Asylum. The fine concerns the deployment of the “Centaur” and “Hyperion” systems, with the former being a high-tech security management system, and the latter concerning the controlled entry-exit of residents of the camps. • Art. 7, 8, Charter
Funding	Total project budget: 11,979,056 EUR, RRF
Actions taken	A complaint was submitted to the DPA in February 2022 by the organisations Homo Digitalis, Hellenic League for Human Rights and HIAS Greece, alongside Academic Niovi Vavoula, triggering the DPA’s investigation.
Project reference	<u>Action: 3.4.8 (16763).</u>



Migration control, including push-backs and deportation

PROJECT 53 BULGARIAN BORDER

Location	Border of Bulgaria
Description	The project aims to purchase patrol vehicles, high-mobility patrol vehicles, specialised vehicles for transporting service dogs (standard and high mobility), 16-seater buses, 50-seater buses, and to provide warranty service for high-mobility patrol vehicles.
Rights violated	This project significantly contributes to pushback practices at the border. The Border Violence Monitoring Network report provides crucial context, detailing the systematic nature of pushbacks, the use of excessive force by border authorities, and the severe consequences experienced by people on the move. The report further includes numerous testimonies corroborating reports of police violence and human rights violations along the Bulgarian-Turkish border. • Art. 1, 4, 18, 21, Charter
Funding	Total project budget: 10,949,571 BGN [5,586,515 EUR], ISF
Actions taken	None
Project reference	BG65ISNP001-2.005-0001 - Procurement of new patrol and specialized vehicles with standard and enhanced off-road capabilities

PROJECT 54 BULGARIA

Location	Bulgaria
Description	The project focuses on implementing compulsory administrative measures for third-country nationals in Bulgaria. It includes the purchase of flight tickets, issuance of visas, and provision of necessary travel documents. Additional components involve medical insurance, financial assistance, medical examinations upon release, treatment at the Ministry of Interior Medical Institute, and the provision of translation services throughout the process.
Rights violated	Bulgaria faces serious concerns regarding the return and forced expulsion of third-country nationals – practices that have recently been criticised by Statewatch.⁵⁵ Analysis of publicly available AMIF data from the 2014–2020 programming period suggests that projects like this one may have facilitated such practices. The lack of transparency and the authorities’ reluctance to engage with independent researchers further hinder accountability. These circumstances indicate that the project may have contributed to human rights violations through arbitrary and potentially unlawful returns. • Art. 1,3,4,7, 21, 24 Charter
Funding	Total project budget: 1,894,517 BGN [966,590 EUR], AMIF
Actions taken	None
Project reference	<u>BG65AMNP001-3.002-0001</u> – Implementation of coercive administrative measures against third-country nationals and provision of translation

PROJECT 55 GREECE, ORESTIADA AND ALEXANDROUPOLI

Location	Orestiada and Alexandroupoli, Greece
Description	Procurement of floating equipment for inland waters (lakes) with integrated thermal imaging cameras and training of operators in the use of old and new floating equipment with the acquisition of a licence.
Rights violated	The systematic practice of pushbacks at Greece's land and sea borders, as documented by numerous international and national bodies, and more recently acknowledged by the ECtHR, has continued to raise critical concerns with regards to the treatment of people seeking asylum at Greece's borders. The documented, by the Frontex Fundamental Rights Officer, engagement of EU-funded assets in such clandestine operations also creates risks of further misuse of EU Funds. The project may risk inadvertently enabling or facilitating further violations of fundamental rights, particularly the principle of non-refoulement. • Art 1, 2, 4, 6, 17, 18, 19, 24, 47 Charter
Funding	Total project budget: 1,605,000 EUR, BMVI
Actions taken	None
Project reference	Call Code <u>EF_BMVI_010</u> / A/A ΟΠΣ 10074

PROJECT 56 GREECE, EVROS

Location	Evros, Greece
Description	Strengthening the operational capacity of the Hellenic Police for the protection and surveillance of the external borders of the country through the renewal of the mandate of two hundred and fifty Temporary Border Guards, who are assigned and perform duties at the services of the Regional Unit of Evros.
Rights violated	The systematic practice of pushbacks at Greece's land and sea borders, as documented by numerous international and national bodies, and more recently acknowledged by the ECtHR, has continued to raise critical concerns with regards to the treatment of people seeking asylum at Greece's borders. The documented, by the Frontex FRO, engagement of EU-funded assets in such clandestine operations also creates risks of further misuse of EU Funds. The project may risk inadvertently enabling or facilitating further violations of fundamental rights, particularly the principle of non-refoulement. • Art 1, 2, 4, 6, 17, 18, 19, 24, 47 Charter
Funding	Total project budget: 27,590,815 EUR, BMVI
Actions taken	None
Project reference	Call Code <u>EF_BMVI_027 / A/A ΟΠΣ 3277</u>

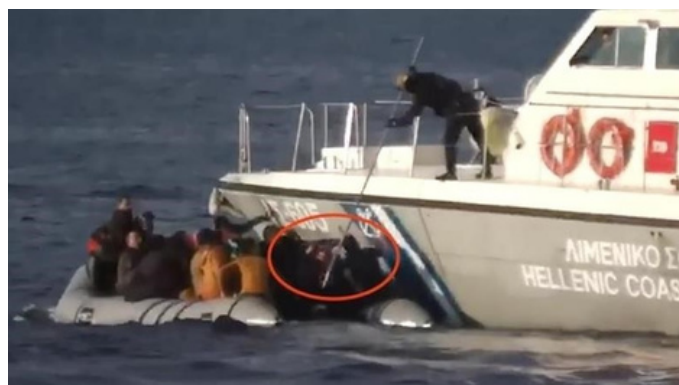
PROJECT 57 GREEVE, EVROS

Location	Evros, Greece
Description	Operational strengthening of the services of the Hellenic Police that carry out tasks related to the control of external borders. Specifically, it will include maintenance/upgrade of the existing automated surveillance system, supply of passport control stamps, supply of batteries for thermal imaging cameras, supply of staff uniforms, plastic helmets.
Rights violated	The systematic practice of pushbacks at Greece's land and sea borders, as documented by numerous international and national bodies, and more recently acknowledged by the ECtHR, has continued to raise critical concerns with regards to the treatment of people seeking asylum at Greece's borders. The documented, by the Frontex FRO, engagement of EU-funded assets in such clandestine operations also creates risks of further misuse of EU Funds. The project may risk inadvertently enabling or facilitating further violations of fundamental rights, particularly the principle of non-refoulement. • Art 1, 2, 4, 6, 17, 18, 19, 24, 47 Charter
Funding	Total project budget: 1,428,012 EUR, BMVI
Actions taken	None
Project reference	<u>EF_BMVI_003</u>



PROJECT 58 GREECE, EASTERN EXTERNAL BORDERS

Location	Eastern external borders, Greece
Description	Reinforcement of Police Services with Police Personnel (Operation SHIELD), with the aim of achieving more effective protection and surveillance of the country's borders.
Rights violated	The systematic practice of pushbacks at Greece's land and sea borders, as documented by numerous international and national bodies, and more recently acknowledged by the ECtHR, has continued to raise critical concerns with regards to the treatment of people seeking asylum at Greece's borders. The documented, by the Frontex FRO, engagement of EU-funded assets in such clandestine operations also creates risks of further misuse of EU Funds. The project may risk inadvertently enabling or facilitating further violations of fundamental rights, particularly the principle of non-refoulement. • Art 1, 2, 4, 6, 17, 18, 19, 24, 47 Charter
Funding	Total project budget: 982,980 EUR, BMVI
Actions taken	None
Project reference	Call Code <u>ΕΦ ΒΜΒΙ 001</u> / Α/Α ΟΠΣ 9053



PROJECT 59 GREECE

Location	Territory of Greece
Description	Procurement of two high seas patrol vessels, which will <i>inter alia</i> have an overall length of at least eighty meters, a helipad capable of landing helicopters of the eleven (11) ton category, will be equipped with maritime surveillance radar and two thermal cameras and will carry two unmanned aerial vehicles with surveillance equipment.
Rights violated	The systematic practice of pushbacks at Greece's land and sea borders, as documented by numerous international and national bodies, and more recently acknowledged by the ECtHR, has continued to raise critical concerns with regards to the treatment of people seeking asylum at Greece's borders. The documented, by the Frontex FRO, engagement of EU-funded assets in such clandestine operations also creates risks of further misuse of EU Funds. The project may risk inadvertently enabling or facilitating further violations of fundamental rights, particularly the principle of non-refoulement. • Art 1, 2, 4, 6, 17, 18, 19, 24, 47 Charter
Funding	Total project budget: 180,000,000 EUR, BMVI
Actions taken	None
Project reference	Call Code <u>BMVI 032</u> / A/A ΟΠΣ 6631



PROJECT 60 GREECE, BORDER AREAS

Location	Border areas of Greece
Description	Procurement of short-range portable thermal imaging cameras (non cooled type), long-range portable thermal imaging cameras (cooled type), bifocal night vision cameras with ballistic helmet with the possibility of adapting them and monocular night vision cameras with ballistic helmet with the possibility of adapting them, all of which will be made available to the Border Guard Departments for the effective control of the external borders.
Rights violated	The systematic practice of pushbacks at Greece's land and sea borders, as documented by numerous international and national bodies, and more recently acknowledged by the ECtHR, has continued to raise critical concerns with regards to the treatment of people seeking asylum at Greece's borders. The documented, by the Frontex FRO, engagement of EU-funded assets in such clandestine operations also creates risks of further misuse of EU Funds. The project may risk inadvertently enabling or facilitating further violations of fundamental rights, particularly the principle of non-refoulement. • Art 1, 2, 4, 6, 17, 18, 19, 24, 47 Charter
Funding	Total project budget: 7,000,000 EUR, BMVI
Actions taken	None
Project reference	Call Code <u>BMVI 028</u> / ΑΑ ΟΠΣ 5071

PROJECT 61 GREECE, BORDER AREAS

Location	Border areas of Greece
Description	Enhancing the operational readiness of the services in charge of external border control and the management of migratory flows, by supplying various types of vehicles.
Rights violated	The systematic practice of pushbacks at Greece's land and sea borders, as documented by numerous international and national bodies, and more recently acknowledged by the ECtHR, has continued to raise critical concerns with regards to the treatment of people seeking asylum at Greece's borders. The documented, by the Frontex FRO, engagement of EU-funded assets in such clandestine operations also creates risks of further misuse of EU Funds. The project may risk inadvertently enabling or facilitating further violations of fundamental rights, particularly the principle of non-refoulement. • Art 1, 2, 4, 6, 17, 18, 19, 24, 47 Charter
Funding	Total project budget: 56,212,546 EUR, BMVI
Actions taken	None
Project reference	Call Code <u>BMVI 027</u> / A/A ΟΠΣ 5072

PROJECT 62 GREECE

Location	Territory of Greece
Description	Special Action (Frontex Equipment): “Enhancing the capacity of the competent Greek Authorities for Maritime and Land borders surveillance”.
Rights violated	The systematic practice of pushbacks at Greece's land and sea borders, as documented by numerous international and national bodies, and more recently acknowledged by the ECtHR, has continued to raise critical concerns with regards to the treatment of people seeking asylum at Greece's borders. The documented, by the Frontex FRO, engagement of EU-funded assets in such clandestine operations also creates risks of further misuse of EU Funds. The project may risk inadvertently enabling or facilitating further violations of fundamental rights, particularly the principle of non-refoulement. • Art 1, 2, 4, 6, 17, 18, 19, 24, 47 Charter
Funding	Total project budget: 17,785,000 EUR, BMVI
Actions taken	None
Project reference	<u>Call Code BMVI 024 / A/A ΟΠΣ 3484</u>

PROJECT 63 GREECE

Location	Territory of Greece
Description	Procurement of Unmanned Aerial Vehicles (UAVs) to meet immediate and urgent needs in border surveillance of areas of responsibility to deter and detect irregular migration and effectively manage migration flows.
Rights violated	The systematic practice of pushbacks at Greece's land and sea borders, as documented by numerous international and national bodies, and more recently acknowledged by the ECtHR, has continued to raise critical concerns with regards to the treatment of people seeking asylum at Greece's borders. The documented, by the Frontex FRO, engagement of EU-funded assets in such clandestine operations also creates risks of further misuse of EU Funds. The project may risk inadvertently enabling or facilitating further violations of fundamental rights, particularly the principle of non-refoulement. • Art 1, 2, 4, 6, 17, 18, 19, 24, 47 Charter
Funding	Total project budget: 3,919,600 EUR, BMVI
Actions taken	None
Project reference	<u>Call Code BMVI 013 / A/A ΟΠΣ 1245</u>

