Submission to the UN Special Rapporteur on cultural rights

on the issue of

cultural rights of persons in the context of migration

by the

Refugee and Migration Studies Hub

(RMSHub)

of the National and Kapodistrian University of Athens

[I. Introduction 3](#_Toc120231865)

[A. The protection of minorities in international law 3](#_Toc120231866)

[B. The protection of non-nationals as minorities 4](#_Toc120231867)

[II. Normative Framework 5](#_Toc120231868)

[A. International 5](#_Toc120231869)

[1) International Covenant on Civil and Political Rights (ICCPR) 5](#_Toc120231870)

[2) International Covenant on Economic, Social and Cultural Rights (ICESCR) 6](#_Toc120231871)

[B. European 7](#_Toc120231872)

[1) European Convention on Human Rights (ECHR) 7](#_Toc120231873)

[2) Framework Convention for the Protection of National Minorities (FCPNM) 7](#_Toc120231874)

[C. Greek 8](#_Toc120231875)

[1) Asylum procedures 8](#_Toc120231876)

[2) National Strategy for Integration 8](#_Toc120231877)

[III. Best Practices and Areas of Further Development 9](#_Toc120231878)

[A. Best Practices 10](#_Toc120231879)

[B. Recommendations 10](#_Toc120231880)

# Introduction

## The protection of minorities in international law

Under international law, persons belonging to minorities enjoy a combination of “traditional” individual rights and freedoms on the one hand and “enhanced” or “core” minority rights on the other.[[1]](#footnote-1) The former encompasses rights such as the right to private life, the freedom of association, the freedom of expression, the freedom of thought, conscience and religion and the prohibition of discrimination. These rights are universal in nature and can be invoked by every human being, irrespective of their affiliation with a minority.[[2]](#footnote-2)

The latter category includes rights that have been recognized as minority rights in specific conventions, such as Art. 27 ICCPR and the CoE Framework Convention on National Minorities.[[3]](#footnote-3) These rights are not group rights but individual rights with a collective minority dimension.[[4]](#footnote-4) The term “minority” has not been given a legally binding definition in international law.[[5]](#footnote-5) The Human Rights Committee considers that a minority is a group whose members share in common a culture, a religion and/or a language.[[6]](#footnote-6)

## The protection of non-nationals as minorities

The issue of whether non-nationals enjoy minority rights has been hotly debated. The *travaux preparatoires* of the ICCPR indicate that the prevailing opinion, at the time, was for the exclusion of foreigners and new minorities from the protection of Art. 27.[[7]](#footnote-7) While the UN General Assembly considered that the term minorities covered only “separate or distinct groups, well-defined and long-established on the territory of a State”.[[8]](#footnote-8) Nevertheless, the HRCttee has clearly stated that Art. 27 ICCPR applies to all individuals within a territory, including those without permanent residency status or temporarily in the State.[[9]](#footnote-9) The UN Secretary General differentiated between old and new minorities and argued that, in application of the Declaration on the rights of persons belonging to national or ethnic, religious and linguistic minorities, the “old” minorities have stronger entitlements than the “new”.[[10]](#footnote-10) This categorization was reverberated by the Venice Commission, which in a relevant study explicitly attributed minority rights to new non-national minorities.[[11]](#footnote-11)

Within the context of the Framework Convention on National Minorities, States have argued that national-minority status requires citizenship and established ties with a territory and have developed interpretations that exclude the application of the Convention to migrants and non-citizens.[[12]](#footnote-12) However, the Advisory Committee has challenged this interpretation.[[13]](#footnote-13) This is corroborated by the PCIJ well-established jurisprudence, according to which the existence of a national minority does not depend on national recognition and is seen to be a matter of fact rather than law.[[14]](#footnote-14)

The two categories of rights, “traditional” human rights and minority rights may overlap and protect the same human activity. For example, freedom of expression covers in principle cultural expressions.[[15]](#footnote-15) However, recognition of minority rights to forced migrants as a complementary of “traditional” human rights corresponds to the heightened need for protection of their identity as members of a particularly vulnerable group.

# Normative Framework

## International

### International Covenant on Civil and Political Rights (ICCPR)

Under Art. 27 ICCPR, migrants who belong to an ethnic, religious, or linguistic minority group have the right to enjoy, practice, and use their culture, religion, and language together with other members of their community. This is an individual right with a collective dimension.[[16]](#footnote-16) While the formulation of Art. 27 (“persons belonging to such minorities shall not be denied the right”) seemed to imply that such State obligations would be limited to permitting the free exercise of the rights of minorities,[[17]](#footnote-17) the HRCttee has recognized that the enjoyment of these rights may require positive legal measures of protection.[[18]](#footnote-18)

Many rights under the ICCPR are relevant to the enjoyment of cultural life of forced migrants either read alone or in conjunction with Art. 27. For example, Art. 27 read in the light of Art. 34 imposes an obligation to States to undertake a process of information-sharing and consultation with affected communities when their decision-making may substantively compromise the way of life and culture of a community.[[19]](#footnote-19) Furthermore, Art. 20§2, which prohibits the advocacy of national, racial or religious hatred, plays an important role in the protection of forced migrants who may, in expressing and enjoying their culture, fall victims of hate speech.[[20]](#footnote-20)

### International Covenant on Economic, Social and Cultural Rights (ICESCR)

The ICESCR is arguable the most relevant international convention, as it explicitly stipulates a right to participate in cultural life. Culture is a broad, inclusive concept encompassing all manifestations of human existence,[[21]](#footnote-21) including ways of life, language, music and song, religion or belief systems, rites and ceremonies, food, arts, customs and traditions through which individuals and/or communities express their humanity and the meaning they give to their existence.[[22]](#footnote-22)

All people under the jurisdiction of a State party to the ICESCR should enjoy Covenant rights. This includes asylum seekers and refugees as well as other migrants, even when their situation is irregular.[[23]](#footnote-23) Therefore, by virtue of the forced migrants’ right to self-determination under Art. 1 of the Covenant, they are free to pursue their cultural development while Art. 15 expressly recognizes the right of everyone to take part in cultural life. This right is more aptly characterized as a freedom.[[24]](#footnote-24) It has both a negative and a positive aspect.

In addition, the ICESCR imposes an immediate obligation on State parties concerning the prohibition on discrimination on the grounds of nationality or legal status imposes.[[25]](#footnote-25) Therefore, a State cannot discriminate on the grounds of nationality or legal status when taking measures to progressively realize the rights under the Convention. Most importantly, State parties are obliged to take heed of the practical obstacles that certain groups of the population, including forced migrants, may encounter in the enjoyment of the rights under the Covenant.[[26]](#footnote-26) Consequently, they should pay particular attention to the cultural identities of migrants as well as their language, religion and folklore and of their right to hold cultural, artistic and intercultural events.[[27]](#footnote-27)

Another ICESCR article comes into play concerning the protection of the culture of forced migrants. In the words of the Committee on Economic, Social and Cultural Rights, “the right of everyone to take part in cultural life is also intrinsically linked to the right to education, through which individuals and communities pass on their values, religion, customs, language and other cultural references, and which helps to foster an atmosphere of mutual understanding and respect for cultural values”.[[28]](#footnote-28) Educational programmes of State parties should respect the cultural specificities of minorities and forced migrants and incorporate in their educational programs their cultural history and knowledge as well as their cultural values and aspirations.[[29]](#footnote-29)

## European

### European Convention on Human Rights (ECHR)

While the ECHR and its Protocols do not explicitly protect cultural rights, a few of the “traditional” rights enshrined therein have cultural dimensions. The ECtHR has recognized, in the context of the freedom of expression, the importance for an immigrant family with three children to maintain contact with the culture and language of their country of origin.[[30]](#footnote-30) In a number of cases concerning freedom of association, the ECtHR has also noted that associations protecting cultural or spiritual heritage, seeking an ethnic identity or asserting a minority consciousness are also important to the proper functioning of democracy because pluralism is also built on the genuine recognition of, and respect for, diversity and the dynamics of cultural traditions as well as ethnic and cultural identities.[[31]](#footnote-31)

### Framework Convention for the Protection of National Minorities (FCPNM)

The FCPNM is the most comprehensive binding legal document for the protection of national minorities. Protection of cultural rights play a prominent role in this legal instrument which provides for the free expression of cultural identities, participation in cultural life, promotion of intercultural dialogue and knowledge within education systems as well as a diverse media space with broadcasting in minority languages.

Unfortunately, Greece has neither signed nor ratified the FCPNM. However, given that 38 out of 46 CoE member states have ratified it, a European consensus seems to be emerging from the ratification of this specialized international instrument.[[32]](#footnote-32) Therefore, it is possible that the provisions of the FCNMP may be taken into consideration by the ECtHR in interpreting the ECHR provisions when ruling on a case against Greece, even if Greece has not ratified the FCNMP.[[33]](#footnote-33) The ECtHR has already had the opportunity to acknowledge that the emerging consensus among the State parties of the CoE recognizes the special needs of minorities and an obligation to protect their identity and lifestyle, not only for the purposes of safeguarding the interests of the minorities themselves but to preserve a cultural diversity that is of value to the whole community.[[34]](#footnote-34)

## Greek

### Asylum procedures

The legal framework regulating asylum procedures does not refer to the exercise of cultural rights of forced migrants. The only exception relates to the right to access information from experts that relate to special matters like medical, cultural, religious, linguistic, or other issues.[[35]](#footnote-35)

### National Strategy for Integration

The Ministry of Migration & Asylum issued two strategies in 2019 and 2022 related to the integration of refugees. Both strategies are aimed to the social integration of refugees in the Greek society. National Strategy 2019 clarifies that Greece is pursuing an intercultural integration policy and sets specific goals while indicating funding resources. Unfortunately, the global pandemic has delayed its implementation. The National Integration Strategy (2022) sets more general objectives and is oriented toward the social integration of refugees. Actively promoting the European way of life is one of the methods to form cohesive communities but at the same moment cultural rights of forced migrants play a prominent role in both strategies.

The National Strategies expressly adopt the intercultural approach to social integration and the strengthening of intercultural dialogue.[[36]](#footnote-36) Greece is envisaged as an intercultural and open society.[[37]](#footnote-37) The role of intercultural mediators will be expanded[[38]](#footnote-38) and reinforced in procedures involving minors[[39]](#footnote-39) and adults[[40]](#footnote-40) as well as in interactions with public services, local authorities and health services.[[41]](#footnote-41) Emphasis will be placed on educating women to become cultural mediators.[[42]](#footnote-42) Intercultural education for employees at such services is also included in the objectives.[[43]](#footnote-43)

The National Strategies also aim to support the dynamics of intercultural schools under the supervision of the Ministry of Education and in close cooperation with local authorities in order to ensure access to school education for minors.[[44]](#footnote-44) Intercultural mediators will be assigned to schools so as to minimize school abandonment.[[45]](#footnote-45) Intercultural education for teachers will be prioritized.[[46]](#footnote-46) Moreover, the National Strategies aspire to the provision of school libraries with books about other cultures.[[47]](#footnote-47)

Last but not least, the Ministry of Migration & Asylum envisages the commencement of a dialogue with countries of origins for the production of common intercultural activities with stakeholders such as embassies, universities and cultural associations.[[48]](#footnote-48) On the domestic level, a public dialogue will be fostered where migrants will speak about how migration has enriched our countries both in economic and cultural terms.[[49]](#footnote-49) The creation of conditions conducive to a constructive intercultural relationship between individuals and groups based on mutual respect, understanding and tolerance is greatly welcomed.[[50]](#footnote-50)

# Best Practices and Areas of Further Development

## Best Practices

Greece has a wide and strong [network of migrant associations](http://6dim-diap-elefth.thess.sch.gr/Greek/Diapolitismiki_Ekpaidefsi/Enwseis_SyllogoiMetanastwnStinEllada.htm). Most countries of origins of migrants have an active association and along with the Greek Forum for Refugees help and support newly arrived persons. For example, the Ukrainian and Polish communities welcomed and actively supported Ukrainians who fled to Greece due to the war in their country.

To mark the World Refugee Day, in June 2019, Greek chefs and refugee cooks [came together](https://www.unhcr.org/gr/en/11828-cooking-withrefugees-brings-greek-and-refugee-chefs-together-for-world-refugee-day.html) to serve their favourite dishes and fixed menus in selected restaurants in Athens, Thessaloniki, Ioannina, and Lesvos. Visitors had the opportunity to taste Greek, Syrian, Afghan, Iraqi, Iranian, Congolese, and Moroccan gastronomy in thirteen restaurants, which either belong to refugee cooks or are opening their kitchens to refugee cooks living in Greece. The event was organized by the UNHCR and partners.

In June 2022 the Ministry of Migration & Asylum and the Ministry of Culture & Sports initiated the [Multaka project](https://migration.gov.gr/en/multaka-diapolitismikes-periigiseis/), which promotes social integration through intercultural dialogue through visits to museums and archaeological sites. Trained intercultural guides give tours in Greek, Arabic, Farsi, English and French. The tours are interactive and aim to foster intercultural dialogue.

## Recommendations

While the National Strategies foment intercultural dialogue in education, it would also prove greatly beneficial, and in the spirit of the protecting cultural rights, if the State would adopt measures to ensure educational programs for minorities are conducted in their own language, taking into consideration the wishes expressed by communities.[[51]](#footnote-51) We further recommend that the state develops a dialogue specifically focused on cultural rights with the various communities of forced migrants with the aim of empowering their voices as culture is primarily enjoyed in common with other members of the same community. Through this channel, communities will be able to address any difficulties they may experience in enjoying their cultural rights. Last but not least, we recommend that Greece signs and ratifies the Framework Convention on the Protection of National Minorities.

1. Venice Commission. European Commission for Democracy Through Law (Venice Commission) Report on Non-citizens and Minority Rights, Report on 69th plenary session 2006, Council of Europe Strasbourg 18th January 2007 CDL-AD (2007)001, §105. [↑](#footnote-ref-1)
2. HRC, General Comment no. 15: The position of aliens under the Covenant, §§1-2. [↑](#footnote-ref-2)
3. Venice Commission. European Commission for Democracy Through Law (Venice Commission) Report on Non-citizens and Minority Rights, Report on 69th plenary session 2006, Council of Europe Strasbourg 18th January 2007 CDL-AD (2007)001, §105. [↑](#footnote-ref-3)
4. Traditional human rights may also have a collective dimension. For example, the right to freedom of association protects the right of a person to join or leave a group voluntarily with the aim to take collective action to pursue their collective interests. However, for the purposes of these submissions, we will not discuss the collective dimension of traditional human rights. [↑](#footnote-ref-4)
5. Venice Commission. European Commission for Democracy Through Law (Venice Commission) Report on Non-citizens and Minority Rights, Report on 69th plenary session 2006, Council of Europe Strasbourg 18th January 2007 CDL-AD (2007)001, §126. [↑](#footnote-ref-5)
6. HRC, General Comment 23: Article 27, CCPR/C/21/Rev.1/Add.5, §5.1. [↑](#footnote-ref-6)
7. Gaetano Pentassuglia, Minorities in International Law: An Introductory Study, CoE 2002, p. 59. [↑](#footnote-ref-7)
8. UNGA, Annotations on the text of the draft International Covenants on Human Rights, document A/2929 1955, §184. [↑](#footnote-ref-8)
9. HRC, General Comment 23: Article 27, CCPR/C/21/Rev.1/Add.5, §5.2. [↑](#footnote-ref-9)
10. UNSG, Note by the SG - Commentary on the Working Group on Minorities to the UN Declaration on the rights of persons belonging to national or ethnic, religious and linguistic minorities, E/CN.4/Sub.2/AC.5/2005/2, § 11. [↑](#footnote-ref-10)
11. Venice Commission. European Commission for Democracy Through Law (Venice Commission) Report on Non-citizens and Minority Rights, Report on 69th plenary session 2006, Council of Europe Strasbourg 18th January 2007 CDLAD (2007) 001, §6. [↑](#footnote-ref-11)
12. Venice Commission. European Commission for Democracy Through Law (Venice Commission) Report on Non-citizens and Minority Rights, Report on 69th plenary session 2006, Council of Europe Strasbourg 18th January 2007 CDLAD (2007) 001, §§22, 27. [↑](#footnote-ref-12)
13. A. Phillips, The FCNM: A Policy Analysis Minority Rights Group International 2002 Available at:

    http://www.minelres.lv/publicat/FCNM\_MRGPolicyPaper2002.htm; Advisory Committee 2nd Opinion on

    Serbia, 25 June 2009, ACFC/OP/11(2009)001, §36. [↑](#footnote-ref-13)
14. PCIJ, Greco-Bulgarian Communities, PCIJ Series b no. 17, 1930, p. 22. [↑](#footnote-ref-14)
15. HRC, General Comment 34 on freedoms of opinion and expression, CCPR/C/GC/34, §11; ECtHR, *Khurshid Mustafa and Tarzibachi v. Sweden*, Appl. 23883/06, §44. [↑](#footnote-ref-15)
16. HRC, General Comment 23: Article 27, CCPR/C/21/Rev.1/Add.5, §3.1. [↑](#footnote-ref-16)
17. UNGA, Annotations on the text of the draft International Covenants on Human Rights, document A/2929 1955, §188. [↑](#footnote-ref-17)
18. HRC, General Comment 23: Article 27, CCPR/C/21/Rev.1/Add.5, §6.2. [↑](#footnote-ref-18)
19. HRC, General Comment 34 on freedoms of opinion and expression, CCPR/C/GC/34, §18. [↑](#footnote-ref-19)
20. HRC, General Comment 22 on freedom of thought, conscience and religion, CCPR/21/Rev.1/Add4, §9. [↑](#footnote-ref-20)
21. CESCR, General Comment 21: Right to take part in cultural life, E/C.12/GC/21, §11. [↑](#footnote-ref-21)
22. CESCR, General Comment 21: Right to take part in cultural life, E/C.12/GC/21, §13. [↑](#footnote-ref-22)
23. CESCR, Statement on the duties of States towards refugees and migrants under the ICESCR, E/C.12/2017/1, §3. [↑](#footnote-ref-23)
24. CESCR, General Comment 21: Right to take part in cultural life, E/C.12/GC/21, §6. [↑](#footnote-ref-24)
25. CESCR, Statement on the duties of States towards refugees and migrants under the ICESCR, E/C.12/2017/1, §5. [↑](#footnote-ref-25)
26. CESCR, Statement on the duties of States towards refugees and migrants under the ICESCR, E/C.12/2017/1, §7. [↑](#footnote-ref-26)
27. CESCR, General Comment 21: Right to take part in cultural life, E/C.12/GC/21, §34. [↑](#footnote-ref-27)
28. CESCR, General Comment 21: Right to take part in cultural life, E/C.12/GC/21, §2. [↑](#footnote-ref-28)
29. CESCR, General Comment 21: Right to take part in cultural life, E/C.12/GC/21, §27. [↑](#footnote-ref-29)
30. ECtHR, *Khurshid Mustafa and Tarzibachi v. Sweden*, Appl. 23883/06, §44; ECtHR, *Gorzelik and Others v. Poland*, Appl. 44158/98, §92. [↑](#footnote-ref-30)
31. ECtHR, *Bekir-Ousta and Others v. Greece*, Appl. 35151/05, §36. [↑](#footnote-ref-31)
32. ECtHR, *Adam and Others v. Romania*, Appls. 81114/17 and others, §94. [↑](#footnote-ref-32)
33. ECtHR, *Demir and Baykara v. Turkey*, Appl. 34503/97, §§85-6. [↑](#footnote-ref-33)
34. ECtHR, *Adam and Others v. Romania*, Appls. 81114/17 and others, §94; ECtHR, C*hapman v. the United Kingdom*, Appl. 27238/95, §93. [↑](#footnote-ref-34)
35. Law 4636/2019, Art. 69§6. [↑](#footnote-ref-35)
36. Ministry of Migration & Asylum, [National Strategy 2019](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https:/migration.gov.gr/wp-content/uploads/2020/05/%CE%926.-%CE%95%CE%B8%CE%BD%CE%B9%CE%BA%CE%AE-%CE%A3%CF%84%CF%81%CE%B1%CF%84%CE%B7%CE%B3%CE%B9%CE%BA%CE%AE-2019.pdf), p. 11. [↑](#footnote-ref-36)
37. Ministry of Migration & Asylum, [National Strategy 2019](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https:/migration.gov.gr/wp-content/uploads/2020/05/%CE%926.-%CE%95%CE%B8%CE%BD%CE%B9%CE%BA%CE%AE-%CE%A3%CF%84%CF%81%CE%B1%CF%84%CE%B7%CE%B3%CE%B9%CE%BA%CE%AE-2019.pdf), p. 32. [↑](#footnote-ref-37)
38. Ministry of Migration & Asylum, [National Strategy 2019](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https:/migration.gov.gr/wp-content/uploads/2020/05/%CE%926.-%CE%95%CE%B8%CE%BD%CE%B9%CE%BA%CE%AE-%CE%A3%CF%84%CF%81%CE%B1%CF%84%CE%B7%CE%B3%CE%B9%CE%BA%CE%AE-2019.pdf), p. 67. [↑](#footnote-ref-38)
39. Ministry of Migration & Asylum, [National Integration Strategy](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https:/migration.gov.gr/wp-content/uploads/2022/09/NATIONAL-STRATEGY-FINAL.pdf), p. 11. [↑](#footnote-ref-39)
40. Ministry of Migration & Asylum, [National Strategy 2019](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https:/migration.gov.gr/wp-content/uploads/2020/05/%CE%926.-%CE%95%CE%B8%CE%BD%CE%B9%CE%BA%CE%AE-%CE%A3%CF%84%CF%81%CE%B1%CF%84%CE%B7%CE%B3%CE%B9%CE%BA%CE%AE-2019.pdf), p. 42. [↑](#footnote-ref-40)
41. Ministry of Migration & Asylum, [National Strategy 2019](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https:/migration.gov.gr/wp-content/uploads/2020/05/%CE%926.-%CE%95%CE%B8%CE%BD%CE%B9%CE%BA%CE%AE-%CE%A3%CF%84%CF%81%CE%B1%CF%84%CE%B7%CE%B3%CE%B9%CE%BA%CE%AE-2019.pdf), p. 54, 57. [↑](#footnote-ref-41)
42. Ministry of Migration & Asylum, [National Strategy 2019](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https:/migration.gov.gr/wp-content/uploads/2020/05/%CE%926.-%CE%95%CE%B8%CE%BD%CE%B9%CE%BA%CE%AE-%CE%A3%CF%84%CF%81%CE%B1%CF%84%CE%B7%CE%B3%CE%B9%CE%BA%CE%AE-2019.pdf), p. 73. [↑](#footnote-ref-42)
43. Ministry of Migration & Asylum, [National Strategy 2019](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https:/migration.gov.gr/wp-content/uploads/2020/05/%CE%926.-%CE%95%CE%B8%CE%BD%CE%B9%CE%BA%CE%AE-%CE%A3%CF%84%CF%81%CE%B1%CF%84%CE%B7%CE%B3%CE%B9%CE%BA%CE%AE-2019.pdf), p. 55, 57. [↑](#footnote-ref-43)
44. Ministry of Migration & Asylum, [National Integration Strategy](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https:/migration.gov.gr/wp-content/uploads/2022/09/NATIONAL-STRATEGY-FINAL.pdf), p. 13. [↑](#footnote-ref-44)
45. Ministry of Migration & Asylum, [National Strategy 2019](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https:/migration.gov.gr/wp-content/uploads/2020/05/%CE%926.-%CE%95%CE%B8%CE%BD%CE%B9%CE%BA%CE%AE-%CE%A3%CF%84%CF%81%CE%B1%CF%84%CE%B7%CE%B3%CE%B9%CE%BA%CE%AE-2019.pdf), p. 59. [↑](#footnote-ref-45)
46. Ministry of Migration & Asylum, [National Strategy 2019](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https:/migration.gov.gr/wp-content/uploads/2020/05/%CE%926.-%CE%95%CE%B8%CE%BD%CE%B9%CE%BA%CE%AE-%CE%A3%CF%84%CF%81%CE%B1%CF%84%CE%B7%CE%B3%CE%B9%CE%BA%CE%AE-2019.pdf), p. 60. [↑](#footnote-ref-46)
47. Ministry of Migration & Asylum, [National Strategy 2019](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https:/migration.gov.gr/wp-content/uploads/2020/05/%CE%926.-%CE%95%CE%B8%CE%BD%CE%B9%CE%BA%CE%AE-%CE%A3%CF%84%CF%81%CE%B1%CF%84%CE%B7%CE%B3%CE%B9%CE%BA%CE%AE-2019.pdf), p. 60. [↑](#footnote-ref-47)
48. Ministry of Migration & Asylum, [National Strategy 2019](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https:/migration.gov.gr/wp-content/uploads/2020/05/%CE%926.-%CE%95%CE%B8%CE%BD%CE%B9%CE%BA%CE%AE-%CE%A3%CF%84%CF%81%CE%B1%CF%84%CE%B7%CE%B3%CE%B9%CE%BA%CE%AE-2019.pdf), p. 68. [↑](#footnote-ref-48)
49. Ministry of Migration & Asylum, [National Strategy 2019](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https:/migration.gov.gr/wp-content/uploads/2020/05/%CE%926.-%CE%95%CE%B8%CE%BD%CE%B9%CE%BA%CE%AE-%CE%A3%CF%84%CF%81%CE%B1%CF%84%CE%B7%CE%B3%CE%B9%CE%BA%CE%AE-2019.pdf), p. 72-3. [↑](#footnote-ref-49)
50. CESCR, General Comment 21: Right to take part in cultural life, E/C.12/GC/21, §52(h). [↑](#footnote-ref-50)
51. CESCR, General Comment 21: Right to take part in cultural life, E/C.12/GC/21, §27. [↑](#footnote-ref-51)