



[REDACTED]
Advocates Abroad
[REDACTED]
[REDACTED]

Valletta, 20.09.2018
EASO/ED/2018/293

Subject: Complaint 1139/2018MDC – failure to reply to correspondence alleging misconduct of EASO staff when conducting interviews with asylum seekers in the Greek hotspots

Dear [REDACTED]

We have received your complaint via the EU Ombudsman and are pleased to respond to the various issues raised in detail. First of all we would like to assure you that we value the work that Advocates Abroad do in support of the asylum seekers on the Greek islands and we take your comments and complaints seriously. Any well-founded criticism helps us to reinforce the quality of our operations.

We regret that your two letters from 25 April 2018 and the request of 31 May 2018 have remained without response. We assure you that this was not the result of unwillingness to respond, but a result of an administrative error (obsolete email address) combined with an apparent lack of clarity with regard to EASO's Code of Conduct, which was intended to be an internal procedure for participants in EASO operational support activities.

Given the intended internal nature of this document, the fact that the email address operations@easo.europa.eu (which was mentioned as contact address in the document) had become obsolete, had not triggered any alarm bells, since all participants in EASO operational support activities currently use a different address to contact EASO, and any concerns with regard to the internal Code of Conduct would be raised there. We regret not having taken into consideration that the internal Code of Conduct was also available online, and thus in the public domain. For any public information requests or comments, the general EASO address info@easo.europa.eu should be used.

Notwithstanding the internal character of the Code of Conduct, we do take the concerns you have raised in your letters about possible breaches of this Code of Conduct seriously. In this letter we will

try to respond to the elements you brought to our attention, and we will make sure to identify lessons learned and needs for improvement, as appropriate.

At the same time, it is important to recall that EASO's role in terms of processing asylum applications is a supporting role, as final decisions on all applications are taken by the Greek Asylum Service. Furthermore, all applicants for international protection have the possibility to raise any issues encountered during the personal interview, which they feel have negatively impacted their application, during the appeal stage.

In reply to the two letters, we first of all verified if the letters contained elements that indicate possible violations of EASO'S internal Code of Conduct. As can be seen from our answers below, we found indications of a number of mistakes made by case officers during the examination process. Mistakes need to be addressed by a proper supervision and quality control system, however, making a mistake does not in itself mean that the case officer deviated from his/her primary task to assess international protection needs, with special consideration to vulnerable groups.

In this letter, we explain the quality assurance mechanisms that EASO has put in place to prevent, reduce and respond to mistakes made during the examination processes, and which are regularly being reviewed. We will also respond clearly to the observations you make in your complaint and lastly, we list the measures that EASO is and plans to undertake to further enhance the quality of the examination procedures under EASO operations.

Quality assurance mechanisms

1. Training of Experts and Interims working on the ground

One of the most important tools to ensure and maintain quality in EASO's work in the operational context in Greece is the continuous training of staff. Bearing in mind the frequent turnover of deployed Member State experts who form a key element in EASO's involvement, the efforts made to provide high quality training and support are of particular importance. Since the adoption of the framework of the EU hotspot approach and the EU relocation scheme under the European Agenda on Migration of May 2015¹, EASO has been working on identifying learning and training needs of the experts on the ground, designing training programmes and subsequently evaluating, adjusting and improving them. Deployed Member State experts and EASO interim caseworkers are in the focus of EASO's training activities, which include operational training concepts, as well as training on the EASO training modules and coaching exercises.

It must be mentioned that all our training material is based on the EASO Training Curriculum, which is the main training tool used by the Agency to train EU asylum officials in Member States. The material is designed together with Member States experts, external experts and is also reviewed by the Reference Group, consisting of UNHCR, civil society, academics and the European Commission. The EASO Operational Training Programmes consist of thematic training related to tasks to be performed on the ground as well as the operational context. We are rigorous and inclusive when

¹ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: A European agenda on migration, Brussels, 13.5.2015 COM (2015) 240 final.

designing operational training programmes, specifically by taking into consideration the link between (a) the target audience, (b) the previous experience of our target audience and (c) the nature of their tasks on the ground, on the one hand and the learning outcomes on the other hand.

For instance, for deployed experienced Member State experts, we mostly focus on face-to-face sessions, to make sure that the deployed experts, who are already equipped with good knowledge and skills in case work, will have the opportunity to learn about the Greek operational context and are provided with a learning space to converge their knowledge, skills and competences to the Greek context.

We pay particular attention to experts working with vulnerable groups. These experts are trained on vulnerability indicators and how to make use of the tool for the identification of persons with special needs to ensure detection at the earliest stage possible. Furthermore, specific training sessions focus on topics such as identifying potential victims of trafficking, applicants with sexual orientation and gender related claims.

We also invest in training of team leaders, whose role is crucial in ensuring a good level of quality of our deliverables and a convergent approach. This training aims to ensure that all team leaders and their staff members speak the same language, adopt the same legal and human rights principles, follow the same methodology for interview techniques and evidence assessment, whilst ensuring a consistent approach across all islands. By contributing in the quality feedback of cases, and by maintaining a close working collaboration with team leaders, we are able to make use of several examples from the ground to feed in our learning material and to disseminate good practices.

We are very close to the needs on ground and to the practical job-related needs of case officers. As from 2017, training is being developed to a different level with the introduction of the concept of 'job coaching'. This provides case officers and other experts with an opportunity to shadow an experienced asylum officer in performing their duties, then gradually starting to perform these tasks on their own, with the support of the experienced colleagues as well as EASO coaches.

At the same time, we are closely collaborating with other EU Agencies aiming to disseminate knowledge not only to case officers but also to other important protagonists in the asylum work, such as border guards and interpreters.

In 2017 and 2018, EASO has so far delivered 65 training sessions in the operational context, reaching out to 740 participants. While in 2017 a total number of 393 participants have been trained in the operational context in Greece, these numbers have already reached 347 by the end of the 3rd Quarter in 2018 with a number of additional training measures being scheduled for the 4th Quarter.

In total, 12 operational training sessions for deployed experts for 232 participants were organised on a regular basis in 2017 (7 operational induction trainings) and in the first three quarters of 2018 (5 operational induction trainings). 146 persons have been trained in various EASO training modules in this time, putting a particular emphasis on the three core modules on Inclusion, Interview Techniques and Evidence Assessment.

Furthermore, with EASO's operational tasks diversifying, additional training concepts are being developed. The extensive training programme for vulnerability experts has first been rolled out in 2018, reaching 24 participants. The need for training and guidance of EASO team leaders is continuously being assessed and addresses with a series of sessions tailor-made to meet these needs. So far, 3 training sessions for team leaders have been delivered in 2018 with a 4th session in planning for this year.

We do believe that we have contributed to improving the quality of the asylum system in Greece as well as contributed to a more consistent and harmonised approach between the various stakeholders. We also believe that we have been consistently improving and we have now reached a very high standard of various training programmes offered to the experts working on the ground. Based on the evaluations we conducted after each operational training we are confident that we have made a difference on the ground. Further information on the currently implemented EASO Training programmes per target group in Greece is included in the annex.

2. EASO guidance

Next to the training mentioned above, EASO has developed practical guidance on the core processes of the examination procedure. The guides form the framework for EASO experts on how to conduct interviews and draft opinions and form the basis for our quality feedback and for a harmonisation of the examination process. The guides are publicly available on the EASO website.

These guides have been complemented with detailed Standard Operating Procedures for the EASO support to the border procedures, which have been agreed with the Greek Asylum Service. To enforce the consistency EASO has developed templates for the different border procedures for both interview and opinion drafting, to ensure that all essential elements are dealt with in a systematic way.

3. Supervision structure

Team leaders ensure the first line of quality control of EASO's support to the examination of applications for international protection. They are experienced case officers who have the skills to give direction and advice to other case officers. Every Team leader supervises a group of 4 to 6 case officers.

The Team leader discusses every case with the case officer before the interview is concluded, to ensure that all relevant questions have been asked before the applicant leaves the interview area. The Team leader further reviews every draft opinion, based on the 4-eyes-principle, before it is shared with the Greek Asylum Service.

On each of the Greek islands the Team leaders work under the overall supervision of the EASO Field coordinator. The Team leaders are supported by the Helpdesk as detailed below.

4. Helpdesk

In its office in Athens EASO established a Helpdesk in support of the implementation of EASO's support to the border procedure. The Helpdesk is manned by experienced case officers and is coordinated by the EASO Asylum Support Unit in Malta through weekly video-conference meetings. The purpose of the Helpdesk is to:

- Assist the colleague experts in the islands in escalated questions from the field,
- Discuss with the Greek Asylum Service Quality Unit the potential answers to questions related to pending applications, with potential implications on the assessment of other cases,
- Harmonise procedures and quality across islands,
- Improve the internal communication on Questions and Answers through central logging, filtering and sharing of questions and answers.

Since its establishment in July 2017, the Helpdesk has replied to 34 queries from the field. The members of the Helpdesk also carry out missions to the Greek islands to give direct support to the case officers and Team leaders, explain the SOP's and answer to where necessary answer any queries in detail.

5. Quality feedback and Quality guidance note

To complement the supervision by the Team leaders and the Field coordinators and the support of the Helpdesk, the EASO Department of Asylum Support at EASO headquarters in Malta carries out monthly detailed revisions of a batch of 10 anonymised cases.

This is an ex post quality control after the opinion has been supervised by the Team leader and shared with the Greek Asylum Service. Every case is reviewed and discussed by at least two members of the Department of Asylum Support in Malta.

The quality feedback reports are addressed to all the case officers and aim at improving the overall quality of the procedure. It contains concrete examples of what went right during the interviews/opinions and what went wrong. Where needed the overall guidance is further explained based on concrete cases.

6. COI Queries

EASO has developed a query system to support the case officers in the field. Case officers can direct COI questions to a dedicated email address. The EASO COI Sector ensures that the COI queries receive timely answers and can, where needed, request the support from a network of specialised COI researchers of the Member States.

7. Vulnerability experts

Given the particular importance of vulnerability assessments, EASO has deployed on all the Greek islands Vulnerability experts to advise the case officers and to carry out vulnerability assessment interviews where needed.

The Vulnerability experts are directly supported by the Vulnerability team at EASO's headquarters, who organises regular Vulnerability expert meetings in Athens and has developed specific guidance notes on vulnerability.

8. Information platform

To ensure that all guidance is available to the EASO experts, EASO has created an IT platform for the operations in Greece, where all the SOPs, the answers to the Helpdesk queries, the COI queries, the Quality feedback reports, the Quality guidance notes, and the Code of Conduct are made saved together with practical information.

Response to the specific observations

Your organisation has listed a number of observations, which could potentially point to issues with EASO's guidance notes.

However, the observations are made in isolation, irrespective of the full context of the interview or the case. Without the context it cannot be concluded that these observations indeed point to any issues with EASO guidance.

For example the refusal to grant a break at a certain time in the interview can be a mistake, but might be justified by any breaks that were given earlier, the number of such requests, the overall duration of the interview, the precise moment the break was requested, etc.

In many other observations an incident is described and categorised as an issue with EASO guidance, without however indicating the reaction of the case officer. The reaction of the case officer is however essential to understand if he/she acted in accordance to EASO guidance or not.

Lastly, in your list of observations you do not indicate if or to what extent the issues highlighted have led to a wrong decision by the Greek Asylum Service. If that was indeed the case, the applicant had the possibility to launch an appeal against the decision, where the Appeal Committee has the possibility to come to a judgement based on all the elements in the file. For all these observations, the appeal procedure is therefore the appropriate place to bring them forward.

In this reply, we therefore refrain from answering every single case that was brought forward by Advocates Abroad, as the appeal procedure is the right place for this.

We nevertheless want to provide an answer to these observations and for this purpose we have grouped our replies together under different themes.

The response to most of your observations need to be implemented, as far as they were not a ground for an appeal procedure, through quality assurance measures, as described above. These continue to be further improved, as detailed in the last section of this reply.

The observations listed under 'violation of code of conduct' are potential issues against EASO guidance or against the SOP. Also here the observations are made in isolation and no indication is given if and how the issue identified led to a wrong decision, which in any case, like mentioned

above, should be dealt with in an appeal procedure. These observations are therefore discussed in a structured way together with the observations mentioned above.

Special attention is given below to the case [REDACTED], where Advocates Abroad did give the full context of the case in two letters and which is also repeatedly mentioned under the list of observations.

Interview techniques and duty to investigate

As clearly stated in the CJEU judgement in Case C-277/11, under Article 4(1) of Directive 2004/83, although it is generally for the applicant to submit all elements needed to substantiate the application, the fact remains that it is the duty of the Member State to cooperate with the applicant at the stage of determining the relevant elements of that application. This requirement that the Member State cooperates therefore means, in practical terms, that if, for any reason whatsoever, the elements provided by an applicant for international protection are not complete, up to date or relevant, it is necessary for the Member State concerned to cooperate actively with the applicant, at that stage of the procedure, so that all the elements needed to substantiate the application may be assembled.

A number of observations by Advocates Abroad criticise the fact that questions were posed to the applicants on elements which the case officers, according to the lawyers, should have known, or which are considered to be repetitive. Asking questions, even questions to which the case officer may already know the answer, is a way to give the applicant the opportunity to provide a detailed account. This is part of the probing phase of a theme or sub-theme of the interview, which follows the free narrative on that theme. The probing is necessary to be able to conduct a credibility assessment. Applicants are required to submit all documentary evidence that they have at their disposal. Unless they have documentary proof, the statements of an applicant need to be coherent and plausible to be accepted as credible. The relative high number of questions during an asylum interview, are precisely there to be able to demonstrate that the statements of the applicant are indeed coherent and plausible and to conclude that the benefit of the doubt can be applied.

With this in mind and in full awareness of the great importance of the personal interview for the asylum procedure, EASO has integrated training on interview techniques as mandatory component in the extensive training programme as highlighted above. Consequently, sessions based on the EASO training module on Interview Techniques form an integral part of all operational induction trainings delivered in the context of EASO operations in Greece from the very beginning of EASO's involvement, striving to maintain and improve the quality of personal interviews conducted.

In particular, during the operational training, the information provided through the EASO training module is applied to the operational context in practical exercises based on case studies reflecting feedback gathered through the regular quality feedback reports.

Bearing in mind that the aim of the personal interview is to gather sufficient, detailed and reliable information to assess whether an applicant meets the criteria required to be granted international protection, EASO has recently upgraded the relevant training module. With the aim of conducting ethical and effective interviews, EASO interviews follow the Asylum Interview Method which provides caseworkers with a roadmap that is flexible enough to adapt to variations in the need for information and different challenges arising in interview situations. The module is structured around the Asylum Interview Method and it includes a section on the interview frame and five

phases of a personal interview in the asylum context (preparation, opening, free narrative, exploring and closing phase).

The interview frame introduced during the training sessions provided in Greece aims to build the caseworkers knowledge on the personal interview, introducing the objectives of the interview and the legal framework. The focus is on various factors affecting the interviewer, the applicant, and the communication between them. In addition, the interview frame provides knowledge on important elements that are relevant throughout all the phases of the Asylum Interview Method, such as the theory on memory, how the memory works, and how it is linked with the credibility assessment and knowledge about culture and intercultural communication.

The aim of the preparation phase is to make necessary physical and mental preparations, analyse the applicant's origin and potential special needs; make a first assessment of the material facts of the claim; and identify potential credibility concerns that need to be followed up in the interview.

Conduct of interpreters

The notion of high quality interpretation being of paramount importance in the asylum procedure as highlighted by Advocates Abroad is shared by EASO. With this in mind, EASO has rolled out a number of training sessions on the EASO training module of Interpreting in the Asylum Context for the EASO interpreters deployed in operations in Greece.

The EASO training module on Interpreting in the Asylum context comprises a 20-25 hours e-learning programme followed by a two-day face-to-face session, facilitated by a team composed of an experienced asylum case officer and a trained interpreter.

In particular, the training module provides the interpreters with an introduction to international protection, highlighting the international as well as European legal frameworks. Important aspects of high quality interpretation in the asylum context are discussed in depth, such as professional ethics reflected in the code of conduct of interpreters, professional ways to handle challenging situations, practical techniques of taking notes and managing relevant glossaries. While putting an emphasis on the personal interview, the training for interpreters in Greece also aims at enhancing awareness for vulnerable applicants in the asylum procedure. The theoretical input and practical exercises focus on interpreting for persons subjected to torture, gender-based violence, victims of human trafficking, applicants with mental health disorders, members of the LGBTI community and the specifics of working with children as an interpreter.

The series of training sessions started out in May, with the face-to-face session delivered in Athens on 26-27 June 2018, followed by training on didactics and the professional use of the EASO e-learning platform. The newly appointed trainers formed one part of the trainers' teams. In the period between May and July, EASO trained over 130 interpreters in Greece.

More specifically in the Quality Feedback Report no.25 on the role of the interpreters it was advised to the case officers that:

"No comments should be made by the interpreters on the applicants' statements. Their role should be strictly framed in the interpretation on the questions posed and the responses given. No clarifications on any facts should be given at any stage of the procedure. It is seen as a positive

practice to draft remarks in the interview transcripts when the interpreter goes beyond his/her role.”

The applicant is always given the opportunity to show preference on the sex of the interpreter during the registration. (...)

In case of such interventions, which exceed the interpreters’ role, the case officer should immediately inform the interpreter that making notes during, before or after the interview is not an acceptable practice and goes beyond his/her interpretation tasks.

Reaction of case officers

According to the EASO Practical Guide: Personal Interview, (page 10) “The case officer should use an appropriate tone during the interview, display a non-judgemental attitude and remain unbiased and inquisitive in his/her approach and reaction to the applicant’s statements, including when there are, for example, indications of inconsistencies, forged documents or excludable acts”.

Furthermore, in a number of instances guidance has been given via Quality Feedback Reports to case officers regarding the way they should react on the applicants’ statements.

Set forward below follows an indicative list of such examples of guidance given to completed cases:

- Quality Feedback Report no. 24:

“All these questions should have been asked, if necessary, in a much more neutral manner. The current formulation makes them judgmental. As an example we could refer, the last example above about the way they fell in love. This is a topic that should have been explored, however the way that is formulated might confuse the applicant and does not help him to provide the information needed.

The important thing is the interviewer to explore the circumstances under which they met each other and the relationship started and evolved.

The inappropriate way that the interviewer approaches the applicant at some points is also reflected in the way that reacts when the applicant does not responds with the expected way, by stating: That was not the answer to my question (page 10, 11).

Confrontation with contradictions

The confrontation of applicants with obvious contradictions needs to be done in such a way that he/she is offered a positive chance to explain the situation.

Good rapport

In case (...) the interviewer is making an effort to maintain his good rapport with the applicant throughout the interview. The following are good examples (...)

- Quality Feedback Report no. 18:

“Inconsistencies or discrepancies: While inconsistencies and discrepancies should always be addressed during the interview, it is important to do it in a way, which is not perceived as judgmental and which is not jeopardising the rapport between the interviewer and the applicant.”

- Quality Feedback Report no. 19:

“Sensitive approach regarding questions clarifying torture

According to the IPSN tool, special guarantees should apply during the interview of an applicant who is a potential victim of torture. Among others, the communication style should be empathetic, using tools that contribute to increasing the quality and reliability of the applicant's statements. For example, good practice of communication with the applicant (...).

The above are examples of questions addressed in a very efficient way to get all the information needed while at the same time showing sensitivity, empathy and interest. However, we would like to raise the attention to few examples where questions were not so appropriate and efficient.”

Case [REDACTED]

The present case had been examined thoroughly by the EASO Department of Asylum Support in the context of the Quality Feedback Report no.23 which is an internal document issued on 27/3/2018.

The report is part of a series of Quality Feedback Reports as explained above. More particularly, the Report includes quality feedback with regard to admissibility cases, eligibility cases and cases examined in the merged workflow in the framework of EASO's operational support in Greece.

Below please see extracts from the Quality Feedback Report no.23 (27/3/2018) which refer to certain parts of this case.

“Role of the interpreter:

In case [REDACTED], during the interview the applicant was asked to speak in his own accent and the interpreter was asked if he/she could recognize it. An interpreter should however not be asked for his or her opinion on the origin of the accent or dialect of the applicant. The interpreter is not hired for his or her qualifications to recognize accents and dialects, nor is he/she trained for this. Any information given by the interpreter on accents and dialects do not meet the standards of a language analysis (which is in any case not available to us in the border procedure) and questions in this regard risks to undermine the position of neutrality of the interpreter. Alternatively, the case officer could ask the applicant about his dialect or on the origin of a word, as this could be a good way to gather information for the credibility assessment of his/her nationality, in case there are doubts.

Sexual Orientation and Gender Identity case

In case [REDACTED] the applicant from [REDACTED] claims to fear persecution because he had sexual intercourse with a transvestite/cross-dressing person. The focus of the interview was to verify if the veracity of the applicant's sexual orientation. However during the interview the applicant stated from the beginning that he did not consider the men with whom he had sexual intercourse as men, that they dressed up as a women, that he is as such attracted to women and that he nevertheless had sexual intercourse with men (dressed as women) because he is 'obsessed' by sex. The applicant did not identify himself as being gay in the sense of particular sexual orientation. The case officer failed to recognize this and continued to question the applicant at length about his sexual orientation (first feelings, relationships,...) (the total duration of the interview was 2 days), to which

the applicant has nothing in substance to answer as he identifies himself as a heterosexual. To put the situation of the applicant into context, it might be helpful to look at an extract (unofficial translation) of a Landinfo reply to a query on Morocco (Respons, Marokko: Forhold for homophile, Landinfo, 10 July 2013). The reply is related to Morocco, but can serve as an example as well for the broader Maghreb.

“In Morocco, sexual relations between men are not uncommon (albeit impossible to quantify), neither before or during marriage (Beaumont 2010; Courtray 1998). The reason for this is, among other things, the family culture's control of women and their sexuality, and that women are thus not available to unmarried (heterosexual) men. In such cases, sexual relations between men are not necessarily an expression of sexual orientation, but a context dependent sexual practice that society sees “through the fingers” because it does not threaten established gender roles and marriage as an institution.”

Consequently, the material fact, in this case, should be the fact of having had sexual intercourse with men and not simply his sexual orientation which was wrongly identified as material fact.

The case officer questions the applicant as well directly about his sexual desires, which led to awkward situations during the interview. However, sexual desires should not be as such the topic of an interview on sexual orientation. When interviewing on sexual orientation, the focus should remain on identity, feelings and relationships, next to the events and facts that led to the fear of persecution.

Furthermore, the case officer confuses the terms transgender, transsexual and transvestite (or crossdresser) throughout the interview. Following descriptions are taken from the EASO Handbook on the Gender, Gender identity and Sexual Orientation module (EASO training curriculum):

Transgender: Transgender describes people whose gender identity and/or gender expression differs from the biological sex they were assigned at birth. Transgender is a gender identity, not a sexual orientation and a transgender individual may be heterosexual, gay, lesbian or bisexual.

Transsexual: Refers to people who identify entirely with the gender role opposite to the sex assigned at birth and who seek to live permanently in their preferred gender role. This often goes along with strong rejection of the physical primary and secondary sex characteristics and a wish to align the body with their preferred gender. Transsexual people might intend to undergo, are undergoing or have undergone gender reassignment treatment (which may or may not involve hormone therapy or surgery).

Transvestite/crossdresser: Refers to people who enjoy wearing the clothing of another gender for certain periods of time. Their sense of identification with another gender can range from being very strong and indeed their primary gender, to being a less critical part of their identity. Some transvestite or cross-dressing people may seek medical assistance to transition and live permanently in their preferred gender at some point in their life. Others are happy to continue cross dressing part-time for the rest of their lives. “

EASO acknowledges that the case officer has made a severe error of judgment when dealing with case ██████. The continuous misunderstanding from the side of the case officer, drove the interview into an awkward line of questioning that should never occur. In other words, the cause of this erroneous interview lies in a misconception from the side of the case officer, but not in discrimination or an attempt of harassment.

EASO further acknowledges that this case should never have passed the quality control of the Team leader. Therefore, we plan to undertake a number of measures to increase the quality of the Team leaders, as discussed in the section below.

Measures to further improve quality

Even though quality improvement is a continuous process, a number of observations made by Advocates Abroad confirm that we need to maintain the measures on quality improvement and complement them with additional measures to reduce any gaps.

Enforcement of the position of the Team Leader

In a recent change of the SOP for EASO's support to the border procedure, we have introduced the obligation for opinions to be signed by both the case officer and the Team leader. The Team leader will in this way clearly take up the responsibility for the opinion and the case officers will see the confirmation of the central role of the Team leader for every opinion that is drafted. In case of disagreement between the case officer and the Team leader, a mechanism is foreseen with the intervention of the Helpdesk to solve the conflict.

Quality assurance methodology

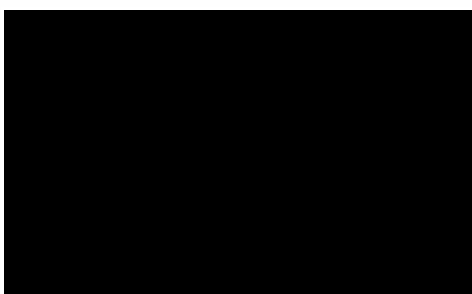
EASO has developed a Quality assurance methodology under the form of the Quality assurance tool, which is published on EASO's website. The Quality assurance tool allows for a systematic supervision of all the key elements in the interview and in the decision. The methodology makes a distinction between mistakes (minor errors) and significant errors. Mistakes are situations of non-compliance where basic principles from the EASO Practical Guides were not followed, which however did not have an impact on the correctness of the overall decisions. Significant errors are situations of non-compliance, which potentially can lead to a wrong decision. EASO will make use of the Quality assurance tool as a compulsory part of the team leaders' supervision.

More targeted Quality feedback reports

The Quality feedback reports by the Department of Asylum Support will be made more effective. Next to the general Quality feedback report, addressed to all the case officers, the quality assessor will, in cases where significant errors were made, provide more detailed, individual feedback to the case officer, his/her Team leader and Field coordinator. The Field coordinator will be responsible to ensure that the measures proposed by the quality assessors, are being implemented.

We trust that the above responses address the points raised in your complaint. We remain however at your disposal should you need any additional information.

Yours sincerely,



ANNEX

EASO Training programmes

Operational training for EASO deployed experts

The EASO operational training for deployed experts targets EU+ Member State officials deployed in EASO operations in Greece. In 2018 (till September), in the context of the Greek border procedure, five operational induction training sessions, with a duration of three days each, for interim caseworkers and deployed Member State experts have been delivered.

The operational training offers thematic face-to-face sessions including practical case studies. The sessions cover topics such as:

- Refreshers on Inclusion, Interview Techniques, Evidence Assessment (as refreshers of the EASO Training Curriculum core modules);
- National asylum procedures and processes;
- Standard Operating Procedures and templates to be used in the framework of the operation;
- Vulnerability assessment;
- Dublin procedure;
- Country of origin information;
- Exclusion;
- Trafficking in Human Beings.

Extensive training programme for junior caseworkers

This extensive training programme has been developed for the preparation of junior caseworkers to be deployed in support of the national asylum authorities in conducting the asylum procedure. This training programme is followed by all interim caseworkers recruited to support the EASO operations in Greece. In 2018 (till September), in the context of the Greek regular procedure, one extensive training programme, with a duration of approx. 7 weeks, has been delivered and one is ongoing.

The training programme is composed of different phases:

Phase 1 - EASO Training Curriculum core modules (online + face-to-face, for a total of three weeks)
Junior caseworkers follow the three EASO Training Curriculum core modules: Inclusion, Interviewing Techniques and Evidence Assessment. These modules have been identified as fundamental for any caseworker, to be operational and able to fulfil his/her tasks, in line with the standards of the EU asylum acquis. Each module is composed of an online part and a face-to-face session. For each module, participants have three days of online studies (around twenty-five - thirty hours) and two days of face-to-face session.

Phase 2 - Operational Training (face-to-face session, duration of three days)

The operational training for junior caseworkers consists of face-to-face sessions on specific topics, selected on the basis of the type of EASO support to the national authorities and on the caseworkers' tasks. The sessions cover topics such as identification of vulnerable applicants, trafficking in human beings, identification of potential Dublin cases, country of origin information, exclusion. The thematic sessions include practical exercises, such as case studies. The operational training for junior caseworkers comprises also of sessions on the national context of deployment of the caseworkers as well as on the tools and templates used in the operations. These particular

sessions are mainly delivered by EASO, national authorities and other stakeholders involved in the same operation.

Phase 3 – On-the-job coaching (duration of two weeks)

The on-the-job coaching, performed preferably in the place of deployment, is articulated in the following phases:

- 1) The junior caseworkers shadow experienced asylum officers in performing their duties, then they gradually start to perform their tasks on their own, with the support of the experienced experts;
- 2) The work of the newly-deployed/newly-hired caseworkers is revised and discussed with EASO coaches. This phase includes also peer review.

Extensive training programme for vulnerability experts

In February and March 2018, EASO rolled out an extensive training programme for vulnerability experts in the context of the Greek border procedure.

This training programme targets experts deployed in EASO operations in Greece, who are in charge of conducting vulnerability interviews, vulnerability assessments and best interest assessments of applicants referred to them by EASO interviewers. They also provide guidance to the EASO interviewers on identification of vulnerabilities.

The training programme consists of the following phases:

Phase 1: EASO Training Curriculum modules on IVP and Gender and SOGI (online + face-to-face, for a total of two weeks)

EASO deployed experts follow the EASO Training Curriculum modules on Interviewing Vulnerable Applicants (IVP) and on Gender, Gender Identity and Sexual Orientation (Gender and SOGI). The IVP module provides trainees with the specific elements to be taken into consideration in an interview with an applicant with special needs, as well as with advanced knowledge on vulnerability, mental and physical impairments. It also advises trainees on how to address difficult situations. The module on Gender and SOGI raises awareness, and provides trainees with knowledge and skills to deal with and to assess an application based on gender- and/or SOGI-related issues. For each module, participants have three days of online studies (around twenty-twenty five hours) and two days of face-to-face session.

Phase 2: Operational training (face-to-face session, duration of four-five days)

The operational training for vulnerability experts consists of face-to-face sessions on specific topics, selected on the basis of the type of EASO support to the national authorities and the experts' tasks such as interviewing children and trafficking in human beings. The operational training for vulnerability experts foresees also sessions on the national vulnerability procedure as well as on the tools and templates used in the operation.

Phase 3 – On-the-job coaching (six-day duration)

Currently implemented for vulnerability experts deployed in the Greek hotspots, it consists of:

- 1) Shadowing of experienced asylum officers in performing their duties related to vulnerability assessment, then gradually starting to perform these tasks on their own, with the support of the experienced experts;
- 2) Revision of the work of the vulnerability experts and discussions with the EASO coaches. This phase includes also peer review.

Operational training for Team Leaders

A specific operational training has been developed for EASO experts deployed as Team Leaders in the framework of the EASO Operations in Greece. This operational training consists of approximately 2-day face-to-face session with theoretical input and practical exercises. Certain segments are repeatedly addressed during the trainings and form the backbone of the operational training programme for Team Leaders such as sessions on quality feedback and procedural issues according to the Standard Operation Procedures. The content of these segments is being adjusted according to the needs on the ground, feedback from participants and the most recent quality feedback reports. Other segments might be included in the training depending on continuous needs assessments. These varying components include, for example, sessions on managerial skills, interviewing applicants with sexual orientation and gender identity related claims, interview techniques, evidence assessment, vulnerability and exclusion.