

# **Training of Lawyers on the European Law relating to Immigration and Asylum (TRALIM 2)**



The project is co-financed with the support of the European Union's Justice programme



## *The Greek Asylum Service: Challenges and Prospects*

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Governor  
Asylum Service  
Ministry of Migration and Asylum



1. *The development of the Greek asylum system: Milestones and characteristics*
2. *Key challenges*
3. *Backlog reduction: Modalities and Novelties*
4. *The Way Forward: Thoughts on the Migration Pact*

## *Key milestones in the development of the Greek asylum system*

- *2013: The Asylum Service becomes operational*
- *2015: The crisis unfolds / Implementation of the 'hotspot' approach / Relocation Program*
- *2016: Closure of the Balkan route/Adoption of the EU Turkey Statement/ L. 4375/2016 / Geographical restriction decision*
- *2017: Council of State decision 2348/2017: Turkey a 'safe third country' for Syrian applicants*
- *2018: Annulment of geographical restriction / New decision with reference to the Statement*
- *2019: L. 4636/2019 (with effect from 1.1.2020)*
- *2020: Suspension of access to asylum (March 2020) / COVID-19 Restrictive measures*

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## *Characteristics of the Greek asylum system*

- *Regular Procedure / Islands Procedure (Art 90 of L. 4636/2019)*
  - Applicants under a geographical restriction on islands
  - Admissibility examination for Syrian nationals on islands
- *Multi-actor approach to asylum management*
  - *EASO Case workers on Islands & Mainland (interview+ non-binding opinion)*
  - *Greek lawyers as assistant case workers (non-binding opinions)*
  - *EASO Registration Assistants on Islands & Mainland*

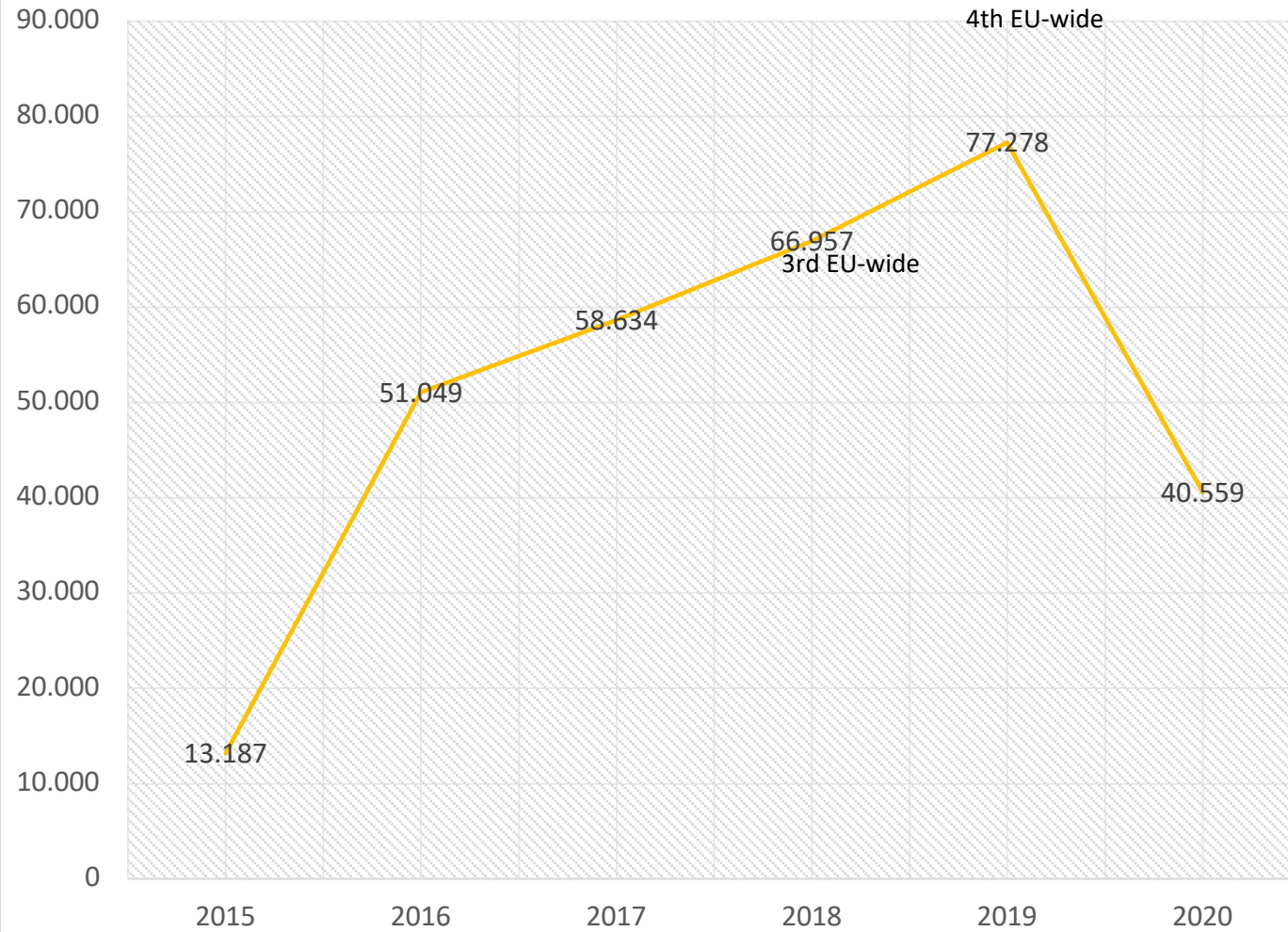
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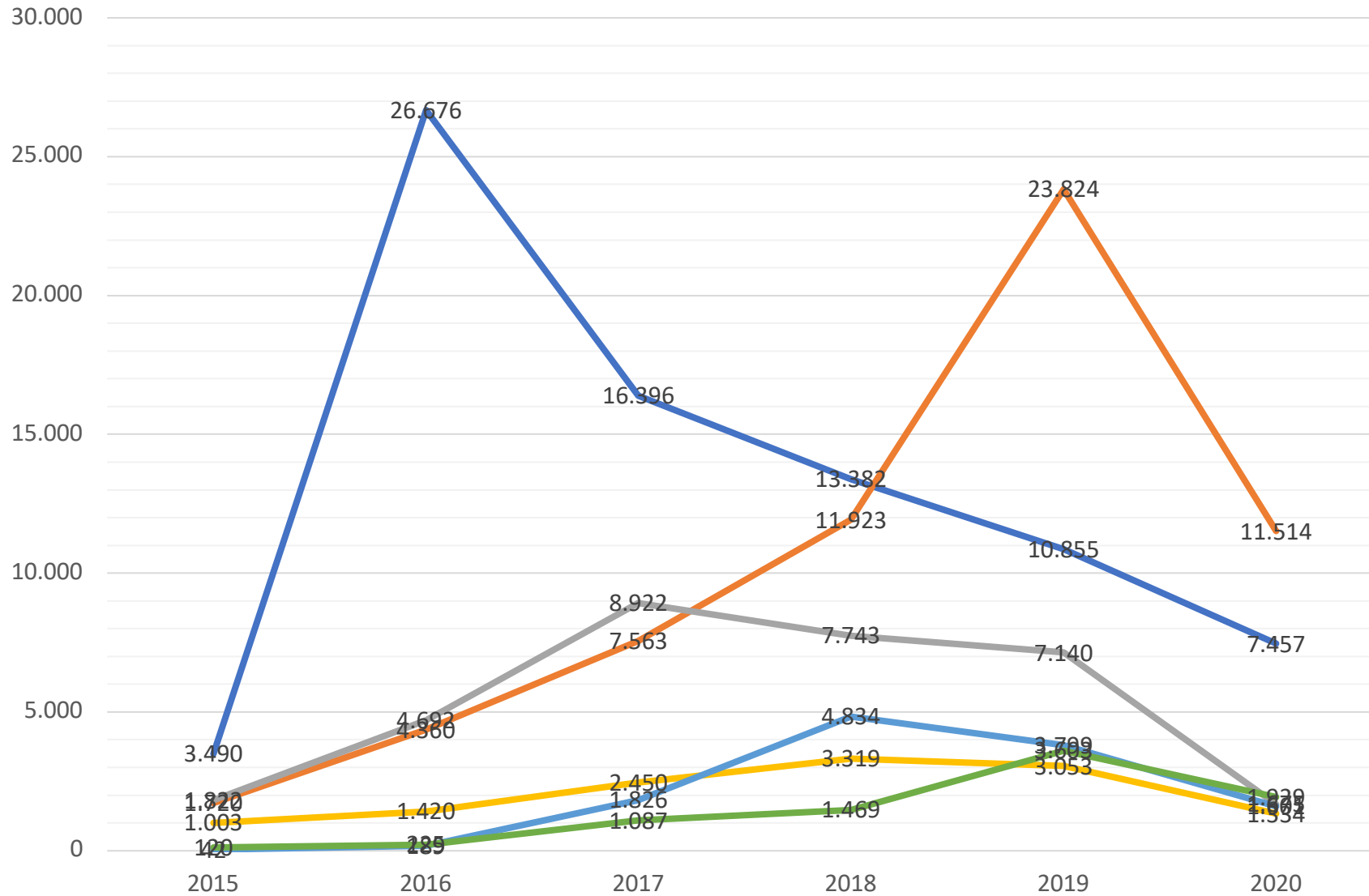


## APPLICATIONS FOR INTERNATIONAL PROTECTION LODGED IN GREECE



# Top Nationalities of Applicants

Syria Afghanistan Iraq Albania Turkey DRC



# Locations of Asylum Registrations (up until 30.11.2020)

	2013	2014	2015	2016	2017	2018	2019	2020	Grand Total
LESVOS	30	209	692	5.091	11.947	17.267	22.249	9.149	66.634
ATTICA**	4.398	6.357	7.830	14.141	8.837	8.375	7.988	4.052	61.978
THESSALONIKI***	0	412	1.190	11.410	7.624	7.367	7.387	3.139	38.529
SAMOS	0	0	0	2.432	5.109	6.742	8.043	5.130	27.456
CHIOS	0	0	0	3.394	6.509	4.082	5.374	3.781	23.140
THRACE	166	900	829	4.456	2.040	2.384	2.331	1.036	14.142
ALIMOS	0	0	0	3.141	3.258	2.571	3.080	1.771	13.821
PIRAEUS	0	0	0	2.470	3.973	2.053	2.579	1.407	12.482
FYLAKIO	122	399	412	448	955	4.182	3.752	1.224	11.494
LEROS	0	0	0	871	1.389	1.783	3.813	1.078	8.934
KOS	0	0	0	685	1.695	2.141	2.342	1.984	8.847
AMYGDALAZA	98	606	588	451	1.544	1.901	2.130	1.198	8.516
KORINTHOS	0	0	0	324	1.065	1.972	2.058	1.473	6.892
XANTHI	0	40	578	386	689	1.232	1.324	480	4.729
RHODES	0	454	803	931	698	726	682	358	4.652
PATRA	0	54	265	414	987	775	814	574	3.883
HERAKLION	0	0	0	4	315	765	667	509	2.260
IOANNINA	0	0	0	0	0	639	665	443	1.747
<b>Grand Total</b>	<b>4.814</b>	<b>9.431</b>	<b>13.187</b>	<b>51.049</b>	<b>58.634</b>	<b>66.957</b>	<b>77.278</b>	<b>38.786</b>	<b>320.136</b>

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## *Key challenges faced*

- 1. Capacity compared to asylum applications - **backlog***
- 2. Asylum applications in specific locations + restriction - **congestion***
- 3. Non-viability of returns (cf. EU-Turkey Statement) – **congestion & backlog***
- 4. Composition of flows – **need for COI + guidance + interpretation***

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## *Overcoming the challenges*

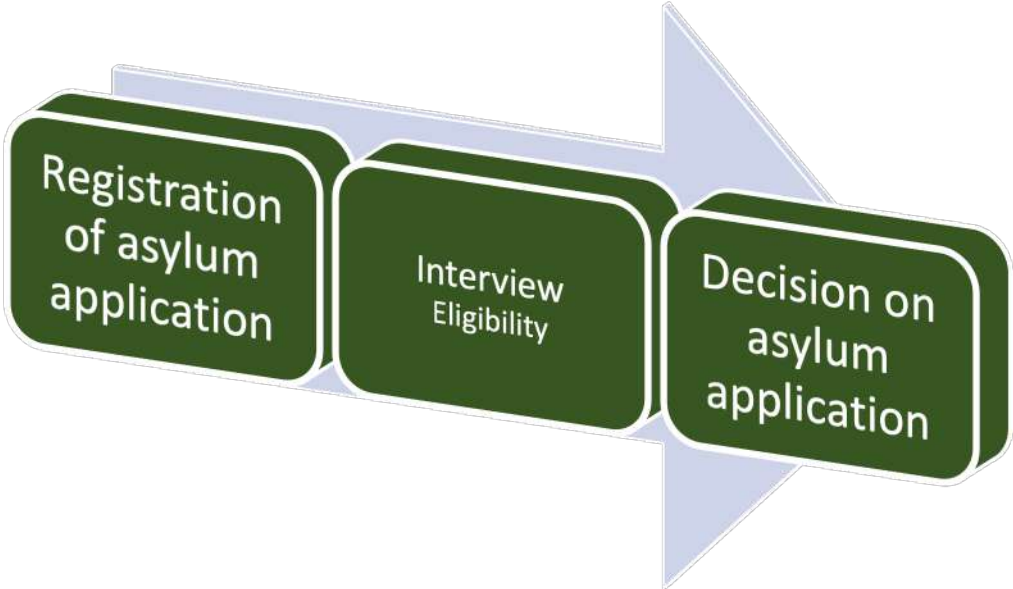
1. *Increasing capacity*
  - ❖ *Hiring of staff (contractual permanent) – EASO involvement*
  - ❖ *Increasing capacity of existing staff through WGs*
2. *Country Specific RSD*
  - ❖ *Country specific Units (Syria, Pakistan, Albania & Georgia)*
  - ❖ *Region specific groups within Offices/Units*
3. *Targeted and constantly updated COI/Guidance*
4. *Constant Monitoring of backlog and Notification of Pending Cases to the Offices*
5. *Training*

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Regular Procedure

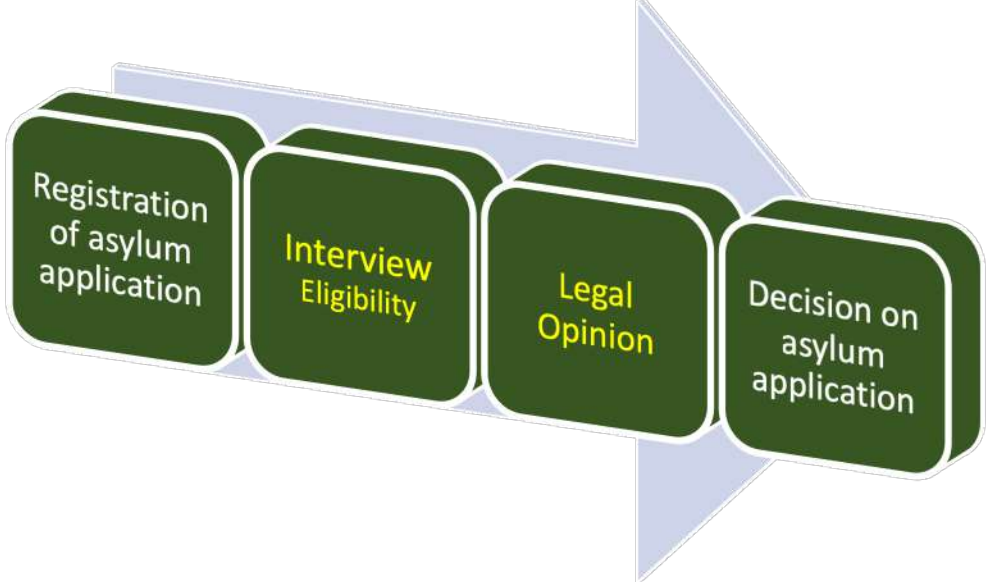


Actors: Yellow: EASO White: Asylum Service

EASO in the Islands Procedure



EASO in the Regular Procedure



## *The Year 2020*

- 1. An overburdened system due to an increase in the flows in 2019*
- 2. Events of Evros – Suspension of access to asylum by Legislative Act (throughout March 2020)*
- 3. COVID-19 Pandemic*
- 4. Moria Fire*
- 5. Relocation Activities*

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## *Thinking outside the box*

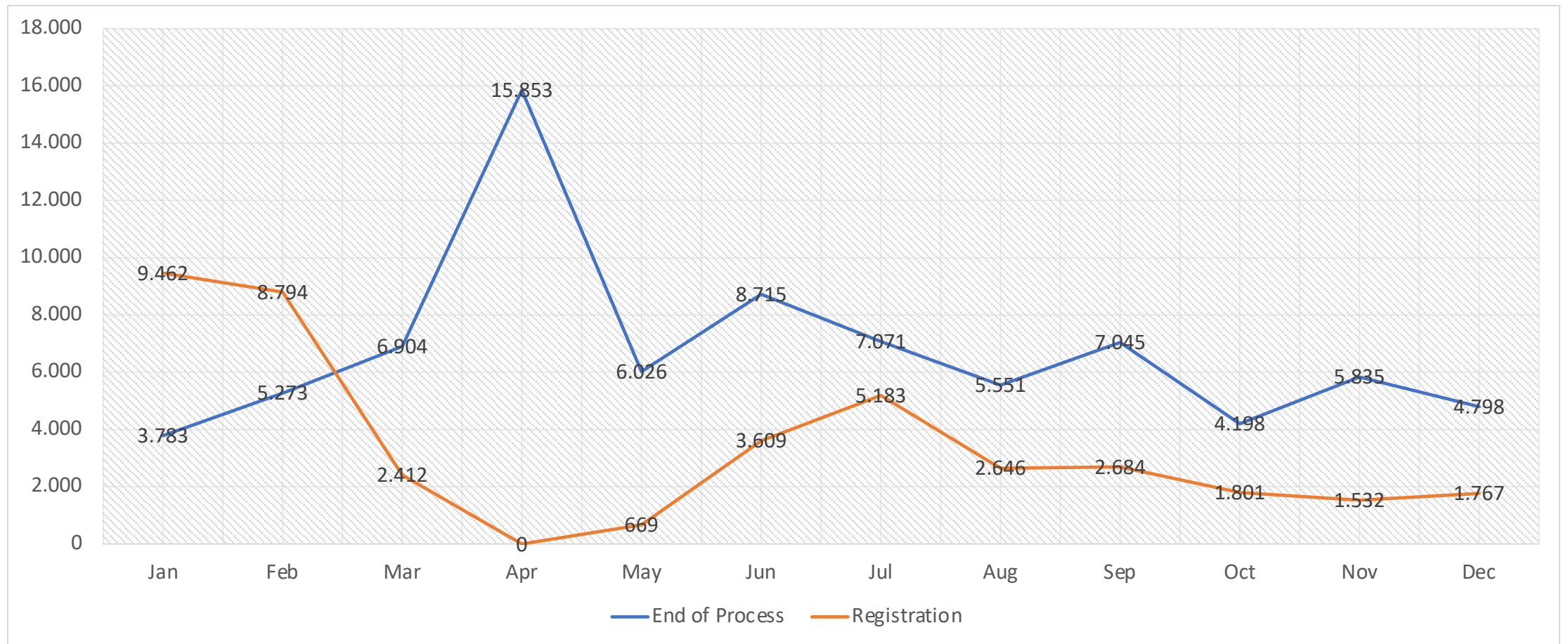
- 1. Prioritization of Decision Backlog Reduction during March April 2020*
- 2. Creation of Interviewing and Drafting Teams*
- 3. Use of digital technology in the asylum procedure*
- 4. Digitizing Access to the System*

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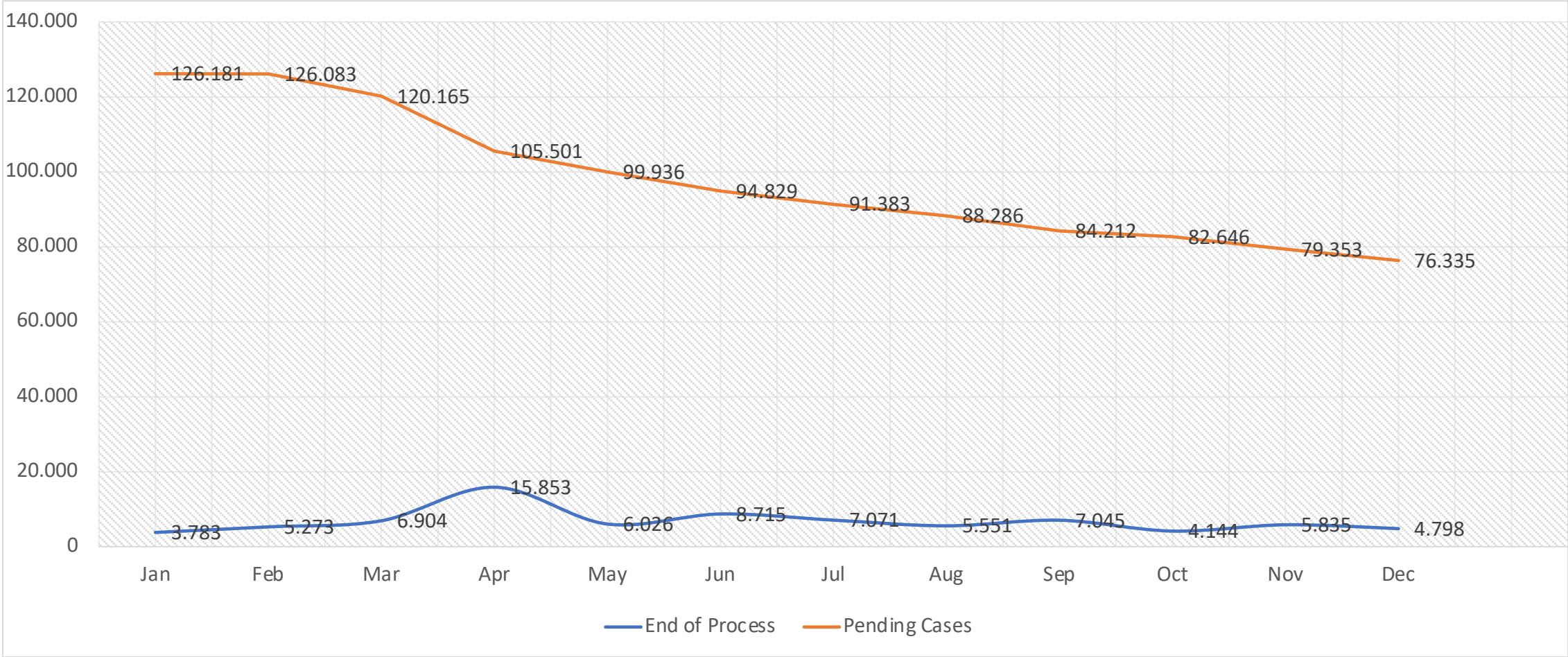


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# Registrations – End of Process 2020



# Asylum Service Backlog – End of Process 2020



## *The Migration Pact*

- 1. Responsibility / Solidarity*
- 2. Border Procedures – but to what avail?*
- 3. Relations with third Parties*
- 4. Legal Pathways to Migration*

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*Thank you!*

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# Training of Lawyers on the European Law relating to Immigration and Asylum (TRALIM 2)

**UNHCR Greece activities**

**Georgios Dafnis, Protection Associate, UNHCR**



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# UNHCR activities in Greece 2010-2019

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Supervisory role

Capacity building and Operational engagement



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Milestone: M.S.S. v. Belgium and Greece, Application no. 30696/09, Council of Europe: European Court of Human Rights, 21 January 2011

Milestone: deepening refugee crisis in 2015

Strengthening the asylum system of Greece

Strengthening the first reception/reception and identification procedures

Enhancement of monitoring activities in view of effective advocacy

Strengthening the reception conditions

ESTIA accommodation and cash program

Strengthening integration perspectives and self-reliance

Operational support in RICs

Strengthening reception capacity and conditions (1,200 asylum seekers before 2015)

Advocacy activities, legislative reviews and legal and policy recommendations

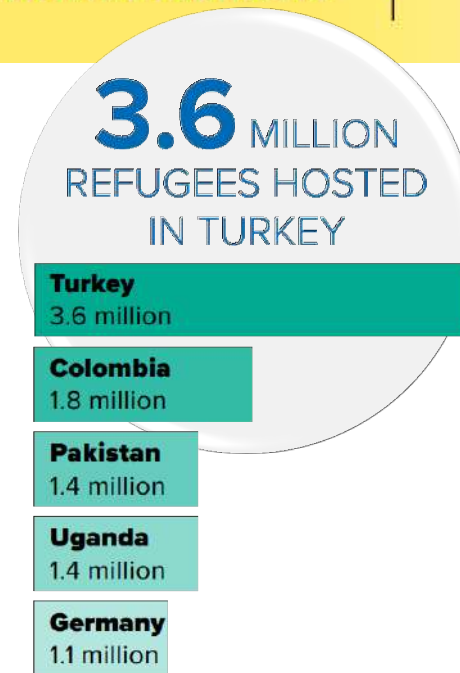
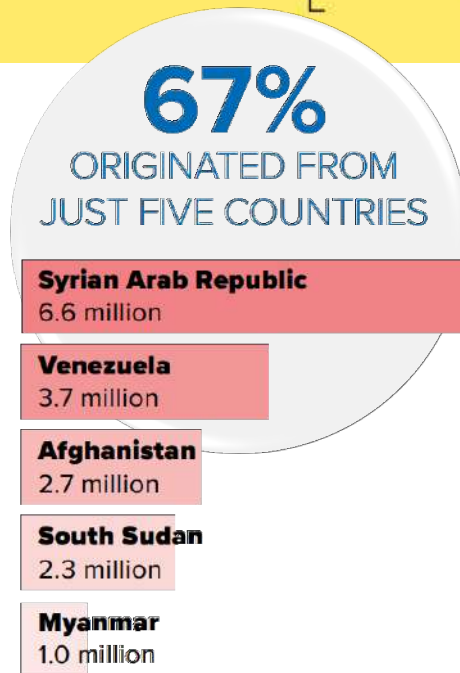
# Mid-year global trends | 2020

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## FORCIBLY DISPLACED WORLDWIDE MID-2020



# Greece situation snapshot and UNHCR activities (end 2020)

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## REFUGEES & MIGRANTS IN GREECE

**119,500**

**99,600** in the mainland & **19,900** in the islands

**15,000**

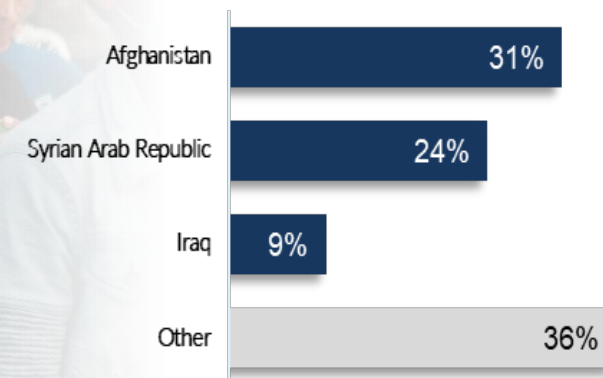
accommodation places by UNHCR

**13,600**

accommodation places by the Ministry of Migration and Asylum

**78,700**

People receiving cash assistance



**57%**

of the total population is women and children

(68,000 people)

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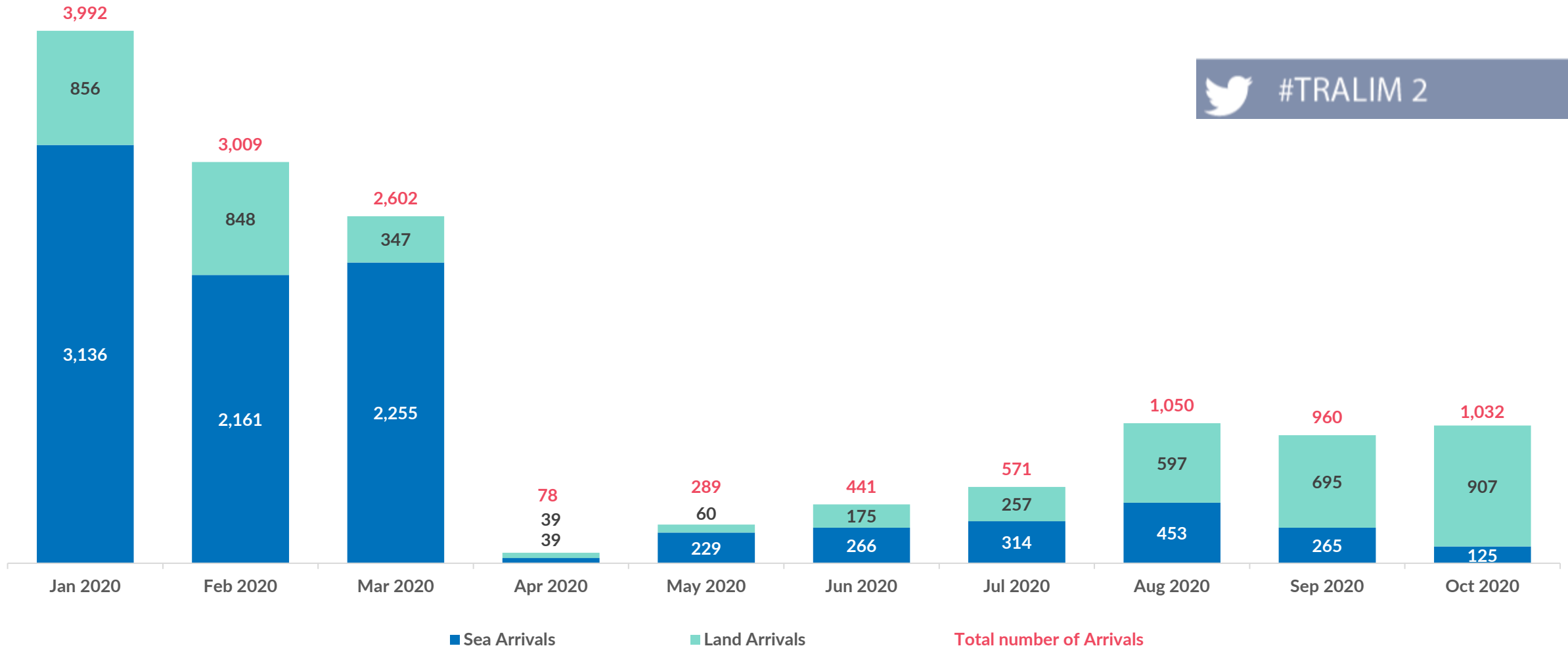
Source: UNHCR population estimate (as of 30 November)

# Sea and Land Arrivals to Greece per month in 2020

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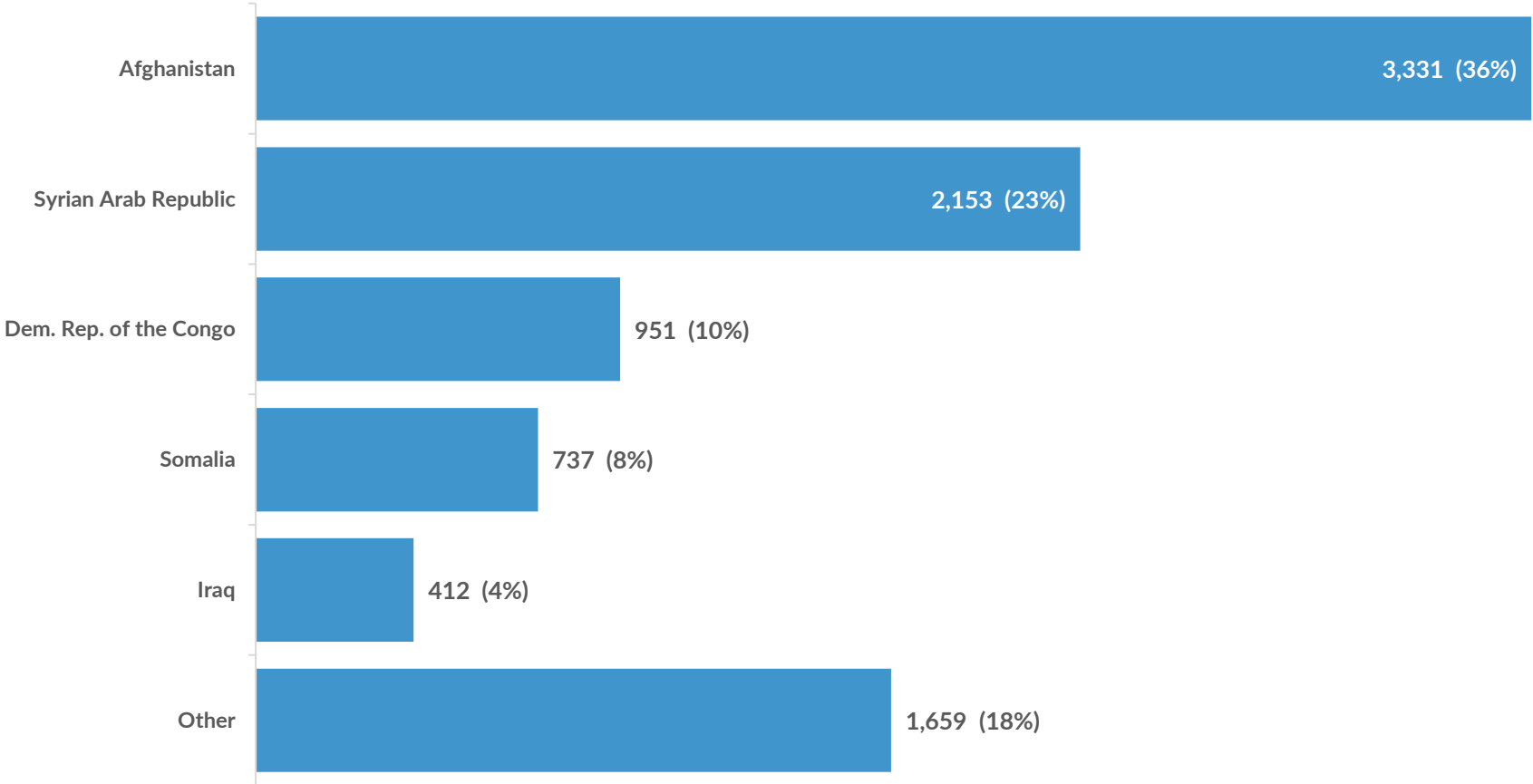
Source: Hellenic Police | Hellenic Coast Guard (as of October 2020; figures are subject to change)

# Nationality breakdown of sea arrivals

(January – October 2020)

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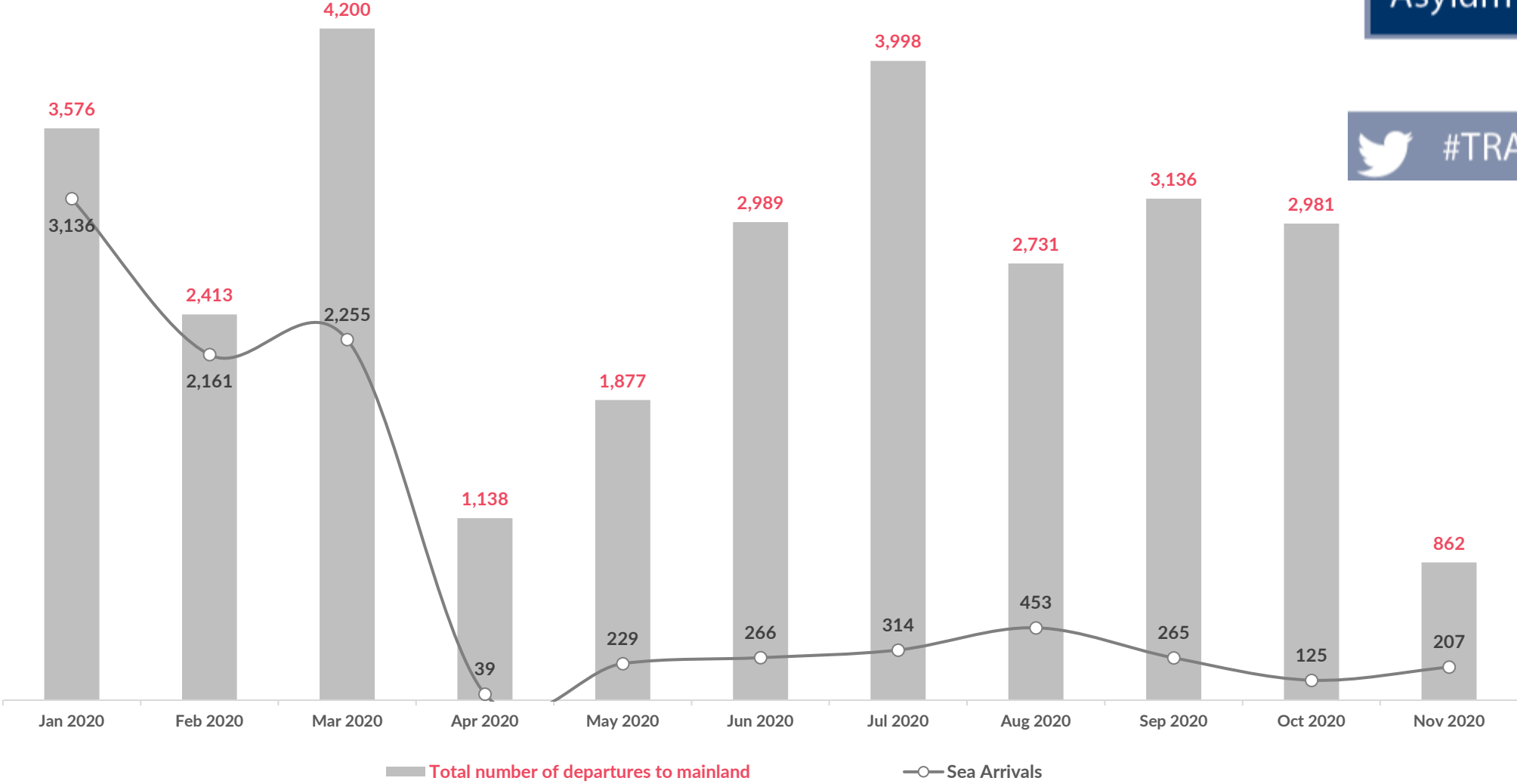


Source: Hellenic Police | Hellenic Coast Guard (as of October 2020)

# Overall situation on the islands

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**29,900**  
total number of departures to mainland

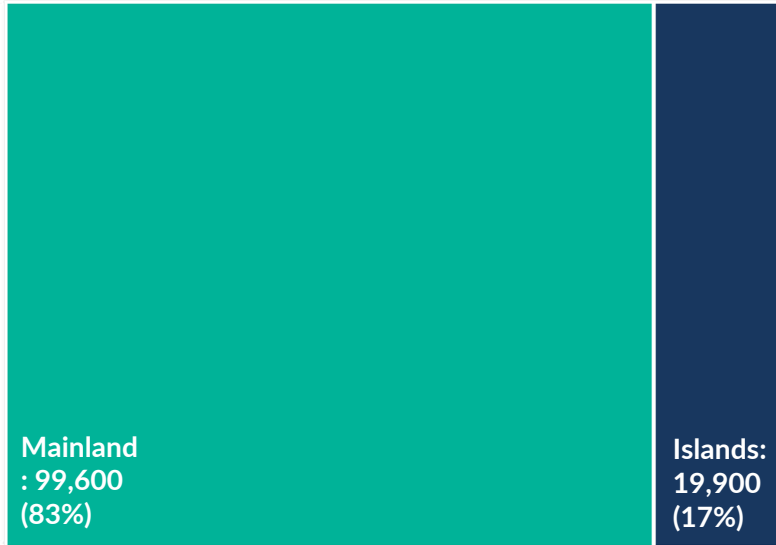
UNHCR supported over 8,000 transfers in 2020

Source: Hellenic Coast Guard; Hellenic Police | UNHCR (as of November 2020)

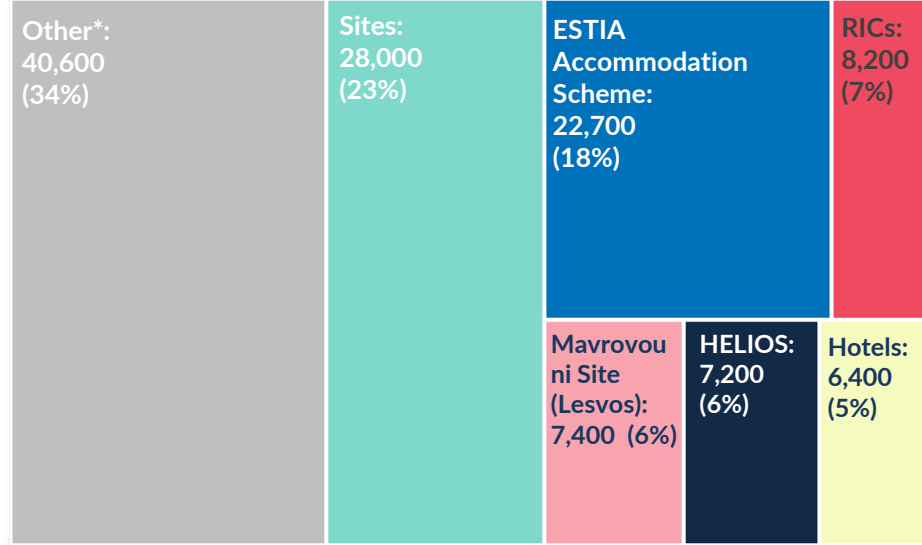


# Population in Greece: 119,500

Population by Location



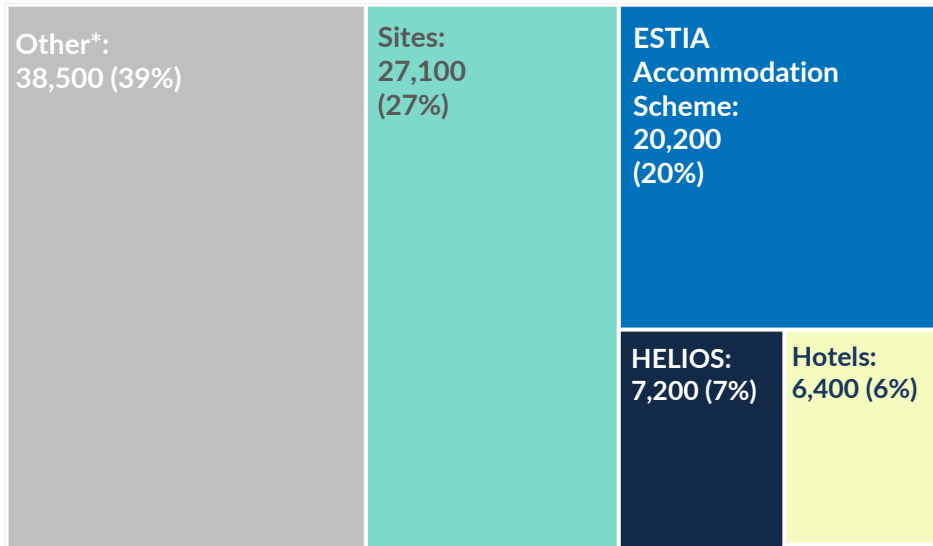
Population by Accommodation Type



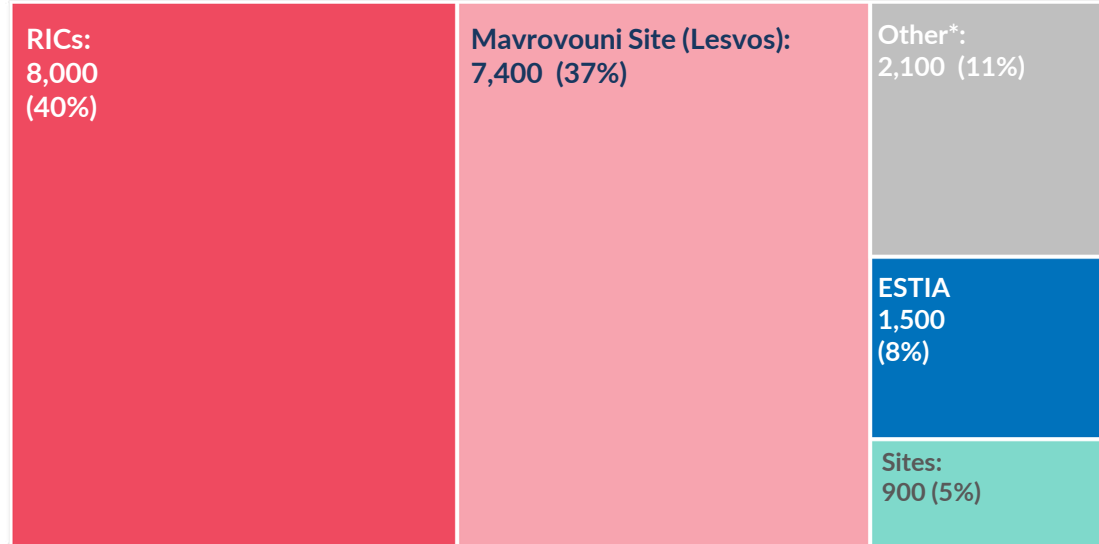
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Mainland - Population by Accommodation Type



Islands - Population by Accommodation Type



\* Other include: Urban population and UASCs in shelters, hotels, protective custody in urban areas | Source: UNHCR population estimates (as of end October)

# Cash assistance

78,700

Number of individuals assisted in October 2020

190,500

Total number of beneficiaries since April 2017

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42,000

number of cash cards (one per family) distributed

58%

Of the recipients are women and children

8.0 M

Euro distributed in October 2020

75 € for a person/month

490 € for seven persons or more

UNHCR's cash assistance programme is funded by the European Commission.

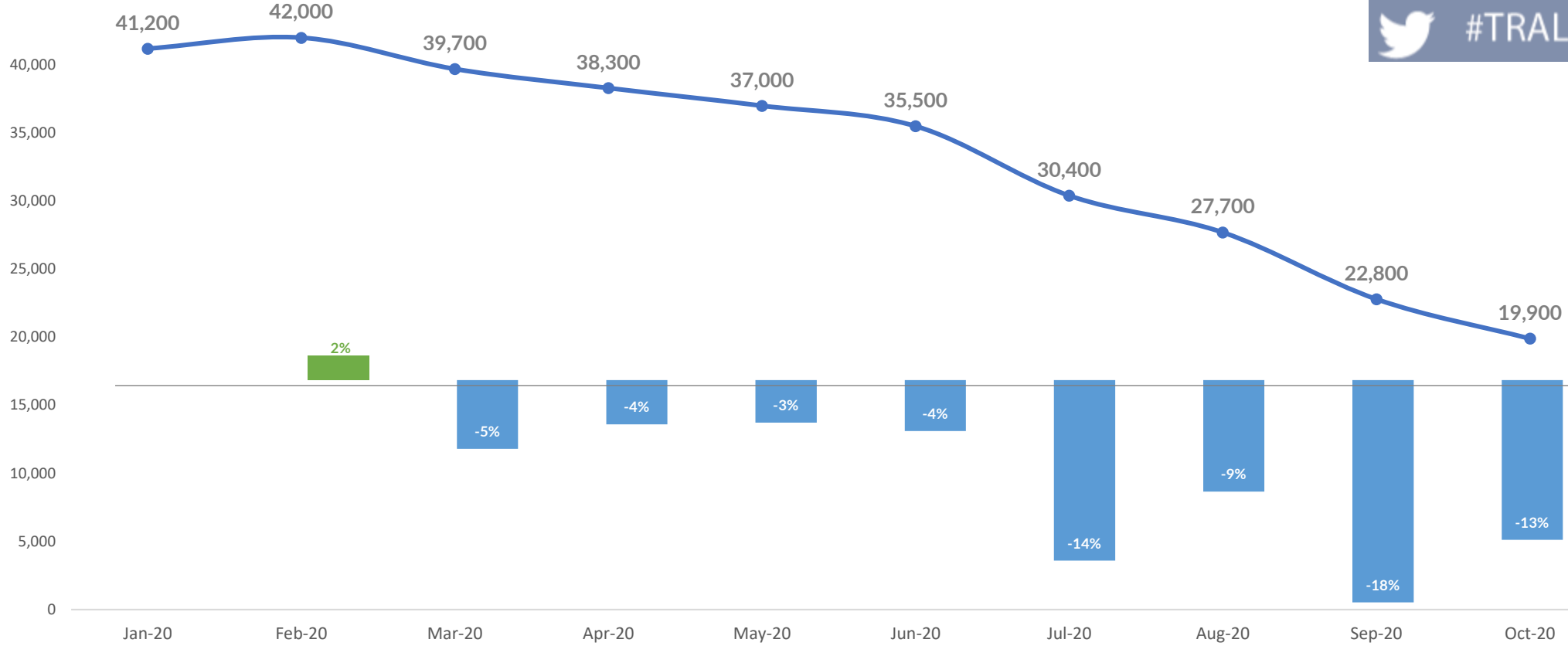
Source: UNHCR (as of October 2020)

# Population on the Aegean islands

(January – October 2020)

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A total **-52%** decline in 2020 but still higher number than the official capacity

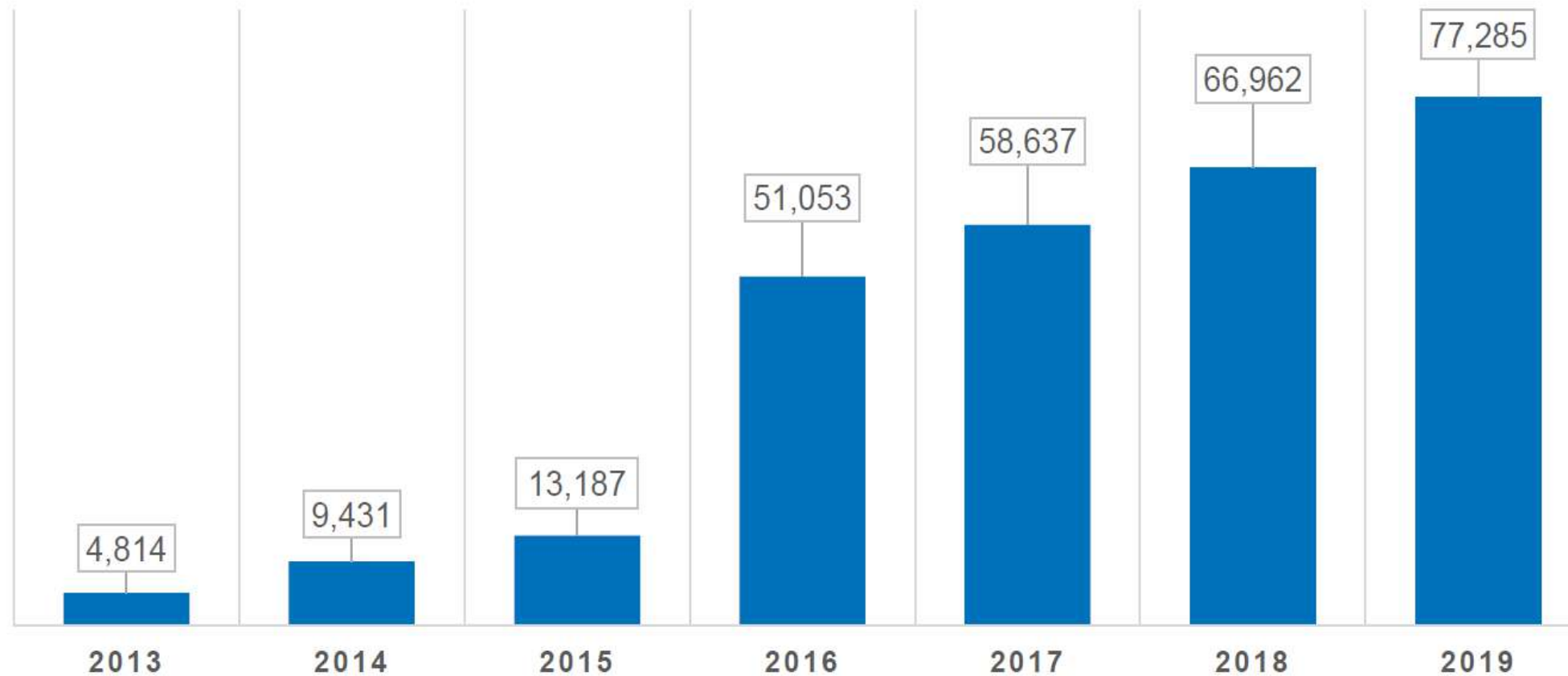
Source: UNHCR population estimates (as of October)



# Asylum applications to Greece



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# Solutions for vulnerable asylum-seekers & refugees

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UNHCR, IOM, UNICEF, and its Greek partners, along with EASO and EC support the Greek Government in relocating **vulnerable asylum-seekers & refugees**, incl. unaccompanied children, from Greece to other European countries.

1,746 relocated from Greece :

- **495** unaccompanied children have departed to Germany, Finland, Portugal, Belgium, Luxemburg, Ireland, France, Bulgaria and Lithuania
- **1,098** vulnerable families and adults relocated to Germany and France
- **153** recognized refugees to Germany and Luxemburg

Source: Ministry of Migration and Asylum | IOM (as of 4 December)



# Protection of children

- Greece's commitment to **end protective custody practices** for unaccompanied children is welcome development
- **Safety net** necessary in absence of care arrangements
- High risk of **homelessness, abuse and exploitation**
- UNHCR works with authorities **on national tracing mechanism**

Source: Ministry of Labour (as of 30 November)

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**4,229**  
unaccompanied  
children  
in Greece

1,467 in shelters

1,037 in insecure conditions

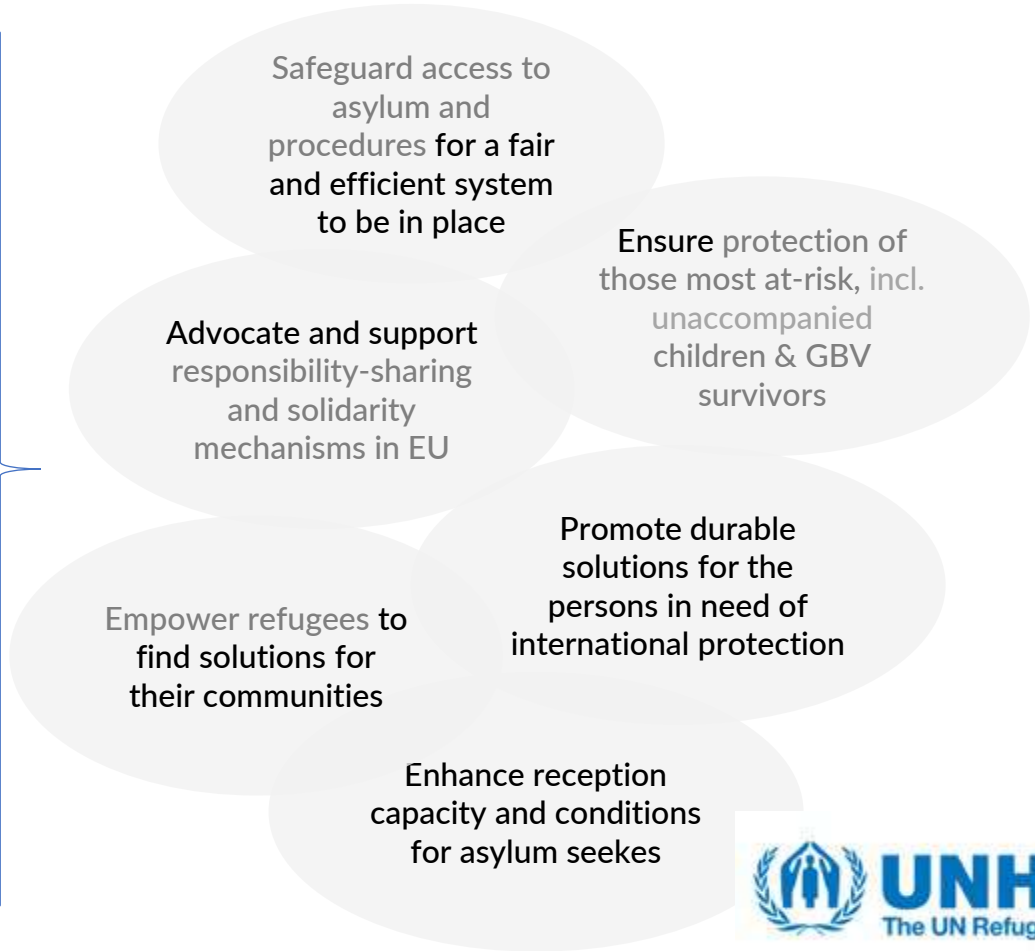
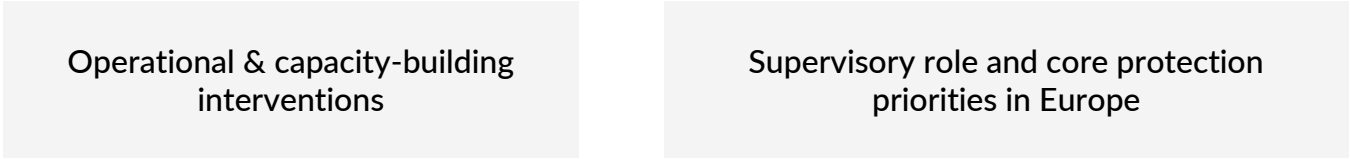


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# UNHCR activities in 2021

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# Law and policy/legal commentaries

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4636/2019

UNHCR Comments on the Law on  
"International Protection and other  
Provisions" (Greece) , February 2020,  
<https://www.refworld.org/docid/5ee3590e4.html>

4686/2020

UNHCR Comments on the Draft Law "Improvement of  
Migration Legislation, amendment of provisions of Laws  
4636/2019 (A' 169), 4375/2016 (A' 51), 4251/2014 (A' 80)  
and other Provisions", June 2020  
<https://www.refworld.org/docid/5ee359cb4.html>



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- for the sake of speediness, procedural safeguards have been significantly reduced
- asylum seekers may be easily excluded from the process without having their international protection needs adequately assessed (risk of refoulement)
- definition of a large number of applications as "manifestly unfounded" or "implicitly withdrawn" and lack of an automatic suspensive effect for these applications at the appeal stage
- stringent requirements for an appeal to be admissible
- lack of adequate access to free legal aid
- the means of notification do not ensure that all measures are taken for the applicant to have knowledge of the content of decisions that concern him/her;
- extends the practice of detention both for asylum seekers and those under return. Detention is essentially turned into the rule for those under return.
- increased time limits for detention of asylum seekers and broader role of the Hellenic Police (instead of the Asylum Service) as the competent authority to decide on the necessity of detention
- the establishment of "closed" and "controlled" centers on the islands



# Provision of legal assistance/strategic litigation

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## Provision of legal aid within and beyond EU minimum standards

- contributing to a fairer and more efficient asylum process as well as promoting the observance of the legal safeguards and access to rights
- provide legal aid from the 1<sup>st</sup> instance of the asylum procedures during which the asylum seekers are mainly heard
- UNHCR had substituted the state at the appeal stage (during which the provision of free legal aid is mandatory as per European and national law) since June 2016 under a Memorandum of Cooperation with the Ministry of Migration and Asylum until the establishment and implementation of a State-run system of provision of free legal aid
- In mainland legal aid by Greek Council for Refugees (GCR) mainly at reception desks in the legal aid partner's premises. On the islands (Lesvos, Chios, Samos, Kos, Leros, Rhodes) and Evros, legal aid services by METAdrasi and GCR also within Reception and Identification Centres (RICs) where most of the population reside, as well as in other (open) accommodation facilities.

## Strategic litigation and Judicial engagement



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- High-profile cases
- Systemic legal/protection gaps
- elaborating positive jurisprudence and promoting good administrative practices (e.g. non-penalization of entry)
- Strategic litigation through judicial engagement in view of influencing courts rulings



**HELLENIC REPUBLIC**  
Ministry of Migration & Asylum

**Dr Georgiadis Dimitrios**  
**Manager**  
*Open Accommodation Centre*  
*Temporary Reception for Asylum Seekers of*  
*Elaionas Attica*



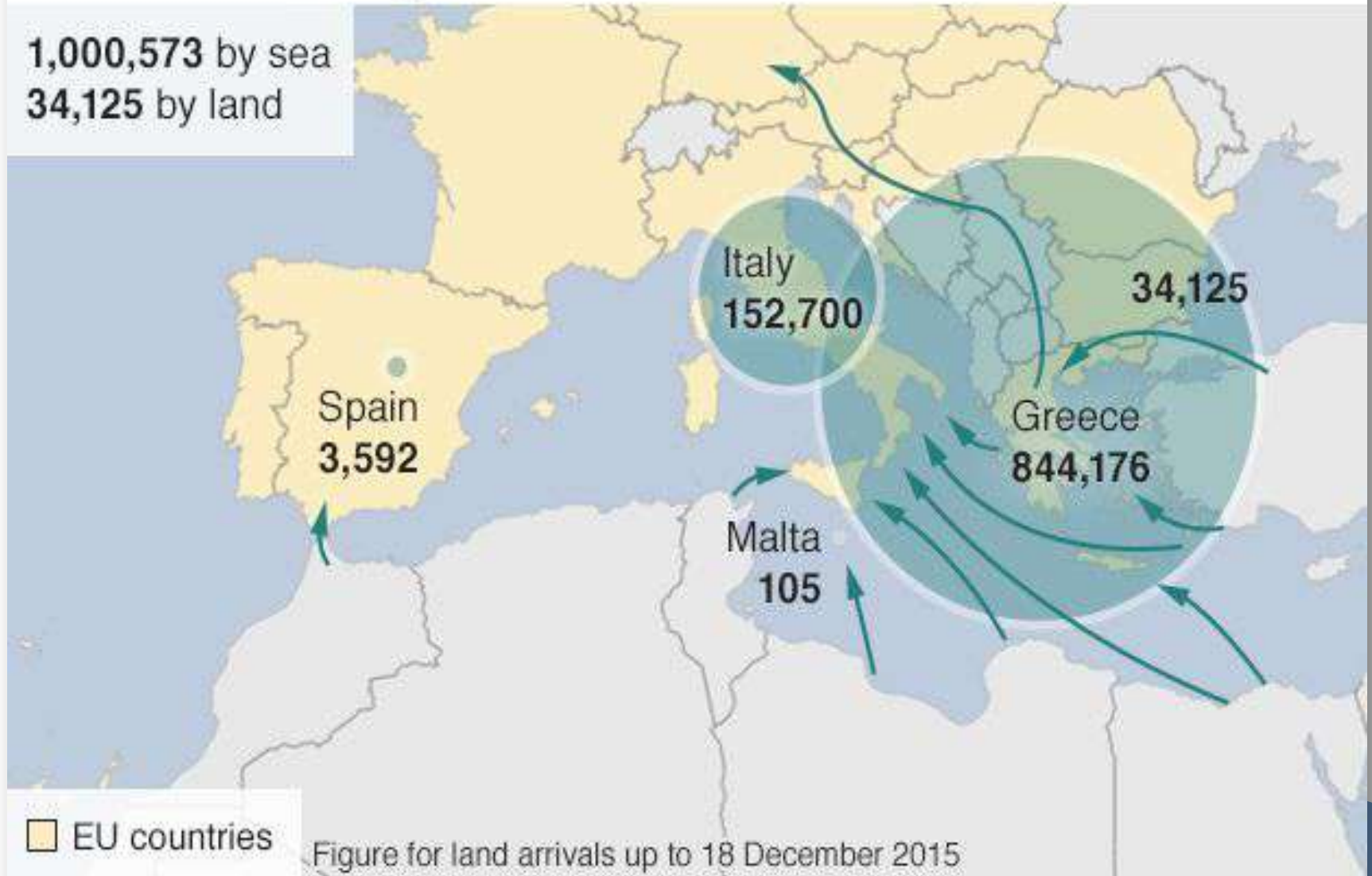
# A LITTLE HISTORY...

- The "refugee issue" entered a critical phase from the beginning of 2015 and peaked between August 2015 and March 2016.
- The flows of refugees in the Mediterranean, towards Greece and Italy, have significantly increased since the summer of 2015.
- At that time the bulk of the refugees headed from Turkey to Greece via the Eastern Aegean islands.

- According to UNHCR official data, 817,175 people crossed the Greek-Turkish border in 2015-2016, 410 drowned and 176 are missing.
- The unofficial number of refugees who arrived in Greece is estimated at 1 million people.
- This population initially headed for Piraeus and then crossed the country towards the border between Greece and FYROM and the passage of Idomeni.
- Upon the closure of the border and the EU-Turkey agreement in March 2016, some 60,000 refugees were trapped in Greece.

# 1 million arrivals by sea in 2015

1,000,573 by sea  
34,125 by land

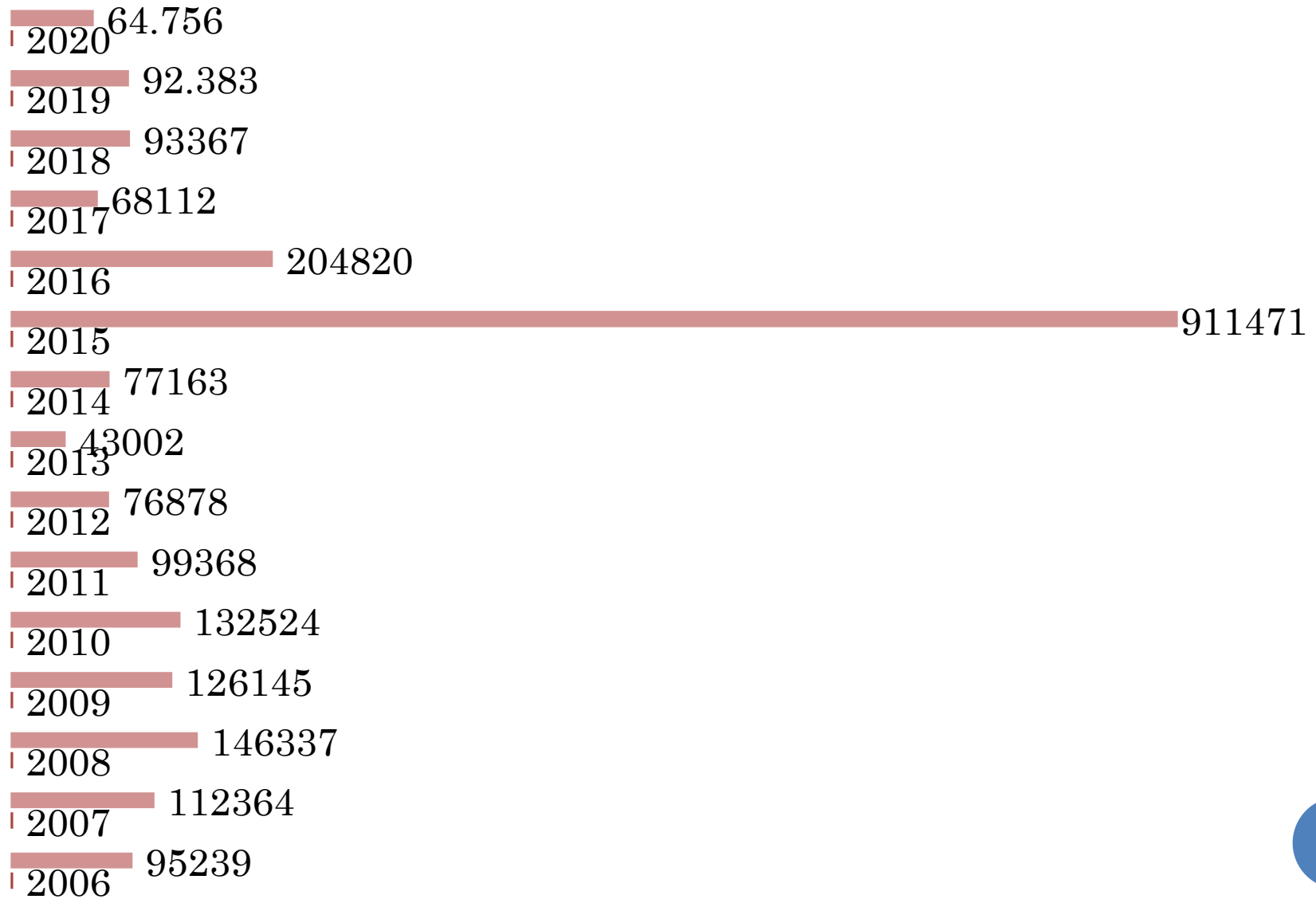


EU countries

Source: UNHCR, IOM

BBC

# Arrivals 2006-2020



# ESTABLISHMENT OF THE RECEPTION & IDENTIFICATION SERVICE

**The Reception & Identification Service (RIS) was established by Law 4375/2016 [repealed by Law 4636/2019]**

*“On the organization and operation of the Asylum Service, the Appeals Authority, the Reception and Identification Service, the establishment of the General Secretariat for Reception, the transposition into Greek legislation of the provisions of Directive 2013/32/EC “on common procedures for granting and withdrawing the status of international protection (recast) (L 180/29.6.2013), provisions on the employment of beneficiaries of international protection and other provisions”.*

# DIGNIFIED RECEPTION



The Reception and Identification Service has as main mission:

- The effective process of the identification procedures of third country nationals or stateless persons entering illegally the country, via the Reception and Identification Centers.
- The establishment and operation of:
  - Open Temporary Reception Structures for third country nationals or stateless persons who have applied for international protection.
  - Open Temporary Accommodation Structures for third country nationals or stateless persons who are under a return procedure or other procedures.



# RECEPTION AND IDENTIFICATION PROCEDURES

The procedures for the reception and identification of third-country nationals or stateless persons are divided into the following stages:

1. Identity and nationality verification;
2. Registration;
3. Medical examination and any necessary care and psychosocial support;
4. Provision of proper information about newcomers' obligations and rights, in particular about the conditions under which they can access the asylum procedure; and
5. Identification of those who belong to vulnerable groups, so that they be given the proper procedure.



## **OPEN ACCOMMODATION FACILITIES**

Facilities (Domes) are located in the mainland and offer temporary accommodation to third-country nationals or stateless individuals who have applied for international protection within the territory of Greece.

They also host the family members of applicants, minors- whether unaccompanied or not, as well as vulnerable individuals.

Facilities (Domes) offer a stable living environment that meets residents' essential material, social and educational needs. Residents live freely without restrictions in Facilities but are obliged to follow the regulations of operation that ensure peaceful and efficient living conditions.

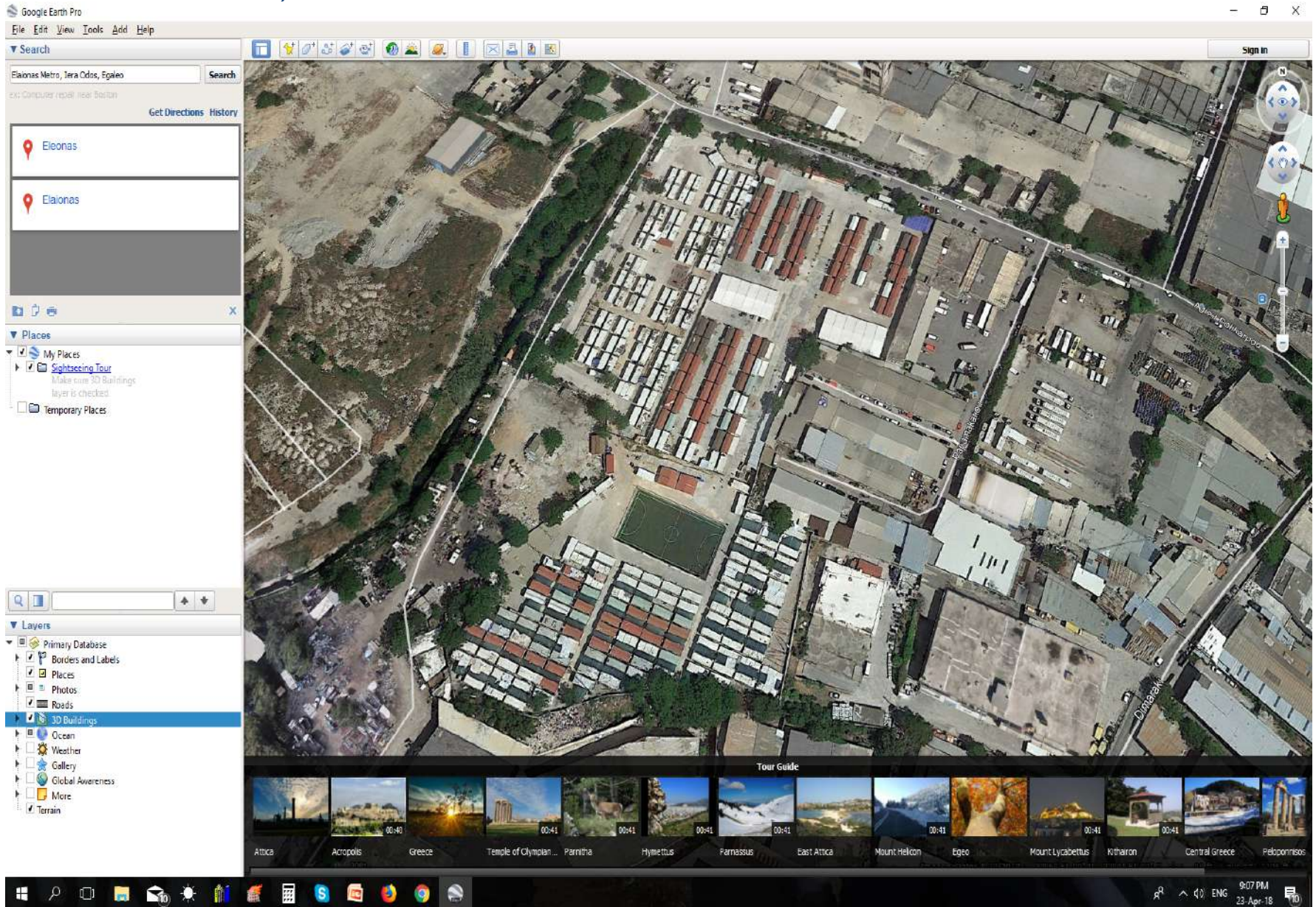
**ELEONAS, THE FIRST “HOSPITALITY CENTER” TO ACCOMMODATE TEMPORARILY THE REFUGEES, IS OPENED BY THE GREEK AUTHORITIES IN ATHENS.**



**ON AUGUST 15TH 2015, ELEONAS REFUGEE CAMP GOT A BREATH OF LIFE. ABOUT 300 MIGRANTS FROM PEDION TOU AREOS PARK IN CENTRAL ATHENS WERE MOVED TO THE “OPEN HOSPITALITY CENTER”, WHICH WAS BUILT IN A TWO-WEEK PERIOD.**



# ELEONAS CAPACITY: 2000 PERSONS (APPROXIMATELY 31 ACRES)



# THE SITE WAS PROVIDED BY THE MUNICIPALITY OF ATHENS UNDER FOUR CONDITIONS.

The facility would be:

- *Temporary*
- *Open*
- *Secured by police*
- *Compliant with all agreed health and safety regulations*

# ELEONAS...

- The centre is open and, while access is restricted to outsiders, the residents are free to enter and exit as they wish.
- Its proximity to the centre of Athens means access to services and to a vibrant city, one of the reasons why Eleonas Refugee Camp will most likely continue to exist for as long as there are refugees housed in camps.
- The accommodation units are containers which are generally considered to provide a better level of housing compared to other camps in the Greece and elsewhere.
- The population currently stands at about 2500 people of various nationalities (containers & tents).
- Their basic needs in terms of security, housing and medical attention are provided for by the Greek authorities and some of the large NGOs.



# WE PROVIDE...

- Social Service
- Health Service
- Education
- sports activities
- a culture centre
- playground
- activities for children



# PARTICIPATION OF ORGANIZATIONS

- Municipality of Athens (SMS actor)
- Ministry of Health (KEELPNO)
- Ministry of Education
- NGOs
- Volunteers



\*Co-financed by Asylum, Migration and Integration Fund of the European Union

ΥΠΟΥΡΓΕΙΟ ΠΑΙΔΕΙΑΣ ΚΑΙ ΘΡΗΣΚΕΥΜΑΤΩΝ

ΕΠΙΧΕΙΡΗΣΙΑΚΟ ΠΡΟΓΡΑΜΜΑ ΔΙΑ ΒΙΟΥ ΜΑΘΗΣΗΣ ΚΑΙ ΘΡΗΣΚΕΥΜΑΤΩΝ

## MORE DETAILS

- **Site Management Support (SMS) (Municipality of Athens),**
  - Supporting the day-to-day management by performing activities such as reception, distributions, community engagement and care and maintenance.
- **Protection (RIS, EATA, EODY, Solidarity):**
  - Supporting vulnerable groups through provision of direct assistance and case management, with special focus on psychosocial and legal support and child protection, as well as the creation of safe spaces for children and women.
- **Interpretation (ITC Organization):**
  - Providing interpretation services facilitating the communication of beneficiaries with the SMS and site actors.

## ○ **Non-Formal Education (ELIX, Elea project):**

- Providing quality learning opportunities to children, youth and adults, through homework support classes for children, Greek and English classes for adults, educational visits and others.

## ○ **Unaccompanied Migrant Children (GCR):**

- Managing Safe Zones to ensure maintenance, provision of food and non-food items, recreational activities and specialized legal and psychosocial support.
- The whole operation of Eleonas SZ has a psychoeducational and psychosocial character.

## ○ **Administrative/Legal Support EASO, NORCAP**

- Developing standard operating procedures and guidelines on site management support.

## ○ **Legal Support to residents: Municipality of Athens, Solidarity.**

- Asylum procedures
- issuance of passports
- Procedure guidance

## POSITIVE: *GOOD PRACTICE*

- The involvement of thousands of government officials (mainly military, health, education, local authorities) as well as the continuous supply of thousands of volunteers, who have supported facilities in every way for a long period of time.
- The creative improvisation of a large number of the people involved, which made it possible to compensate for the initial absence of the state, overcoming shortages or organizational problems and, above all, coping with the grueling bureaucracy at all levels of the state machine.
- The involvement of the effective mechanism of Athens Municipality, which provided the site carrying out very large housing projects within a few weeks.

# INTEGRATION SERVICES

- Eleona's residents have access to services aiming at social integration.
- Local (municipal) and national authorities (Ministry of Education, Research & Religious Affairs), as well as NGOs, (*HUMAN RIGHTS 360, Quring the Limbo, IOM - Helios*) provide
- language courses
- Integration in the education system & labour market
- Integration & access to public services etc.

## • LEGAL FRAMEWORK

**L.4636/2019**, art. 39-61 (*transposes Directive 2013/33 EU on standards for the reception of applicants for international protection in the Greek legal order*)

**Provides for a autonomous Reception Service, under the General Secretariat of Reception.**

- **Contains provisions regarding reception conditions such as shelter, healthcare services, etc**
- **Specific provisions for the protections of vulnerable persons**
- **Provisions for access to education and labor market**

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• **L.4674/2020** [amending certain provisions of L.4636/2019]

- **Article 114 on the residence and exit of refugees [one month following recognition of status] – challenges in practice**

# • LEGAL FRAMEWORK

- **L.4686/2020** [amending certain provisions of L.4636/2019]
- **Article 14, on the delivery of asylum decisions from RIS staff (practically replacing the Asylum Service)**
- **General Regulation for the Operation of accommodation facilities [Decision 23/13532 on 30-11-2020]**
  - → *Duties of the Director, Units operating in the facility such as Administrative Unit, Unit of Healthcare Provision and Psychosocial Support, responsibilities of the Units, services provided, rights and obligations of the population etc*



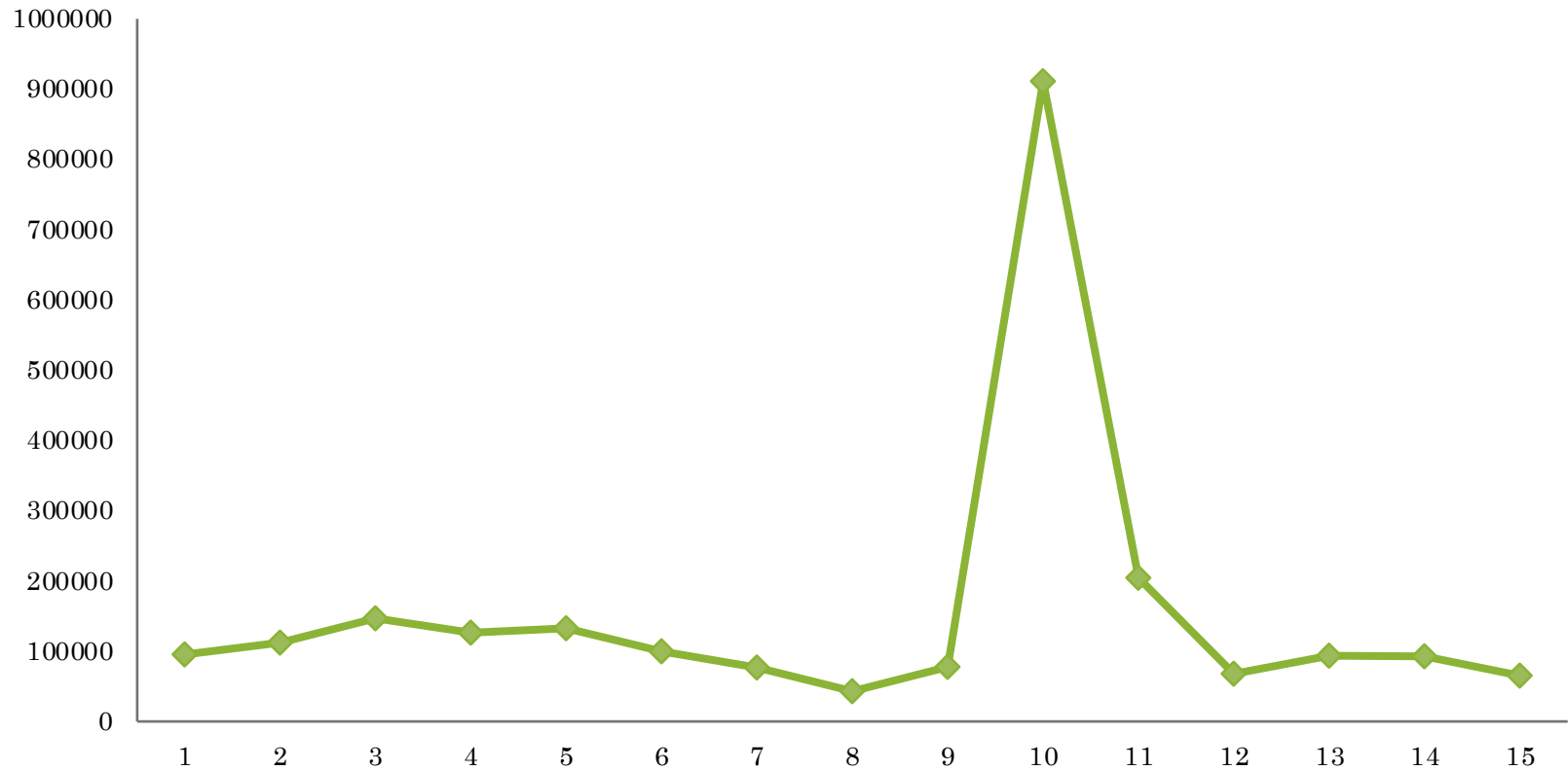
# *THANK YOU*



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## Arrivals in Greece 2006-2020



## **Introduction to Greek Asylum System**

Greece was one of the first countries to sign the Geneva Convention of 1951 and from there on followed all European legislations, regulations and directives, which incorporated into Greek laws.

Until 2011, the issues of international protection, asylum, were regulated with presidential decrees and ministerial decisions in order to be easily modified. As from 2011, the international protection issues are ruled by laws, because the Greek legislators want the asylum legislation to be systematic, comprehensive and to apply to all cases effectively. Nowadays, the legislation on asylum is regulated by two laws, Law 4636/2019 and Law 4686/2020. These laws synchronized all issues concerning the status of international protection, asylum and subsidiary protection.

However, there are yet many difficulties, mostly concerning the particularly long duration of the examination of the applications for international protection, as there are not enough committees in first and second instance for the examination of the applications, adding that the asylum services in Greece are not sufficiently organized. Those difficulties, along with the fact that there are thousands of international protection requests submitted by third countries citizens who entered in Greece, makes the situation very complicated and the examination to delay a lot. The Greek Bar Associations have repeatedly made proposals for the establishment of more committees in first and second instance

with the participation of lawyers as members of the committees, but those proposals were rejected by the Government.

Another difficulty regarding the regulation of the international protection issues, is the complexity of the legislation and it is becoming even worse with the circular letters issued by the Administration, aiming to interpret the law, but in most of the cases the interpretations may differ from, or contradict the law (*contra legem*). Apart from that, the implementation of the current legislation is carried on by Asylum Service officials, judges, police officers, etc., thus, it is often not corresponding to what should be achieved, and to the purpose of the law. Adding that it has been observed that the law has been interpreted differently from region to region.

Also, finally it became clear and accepted by everybody in Greece that the vast majority of immigrants entering into Greek territory, thus, into the European Union, are not refugees in the sense prescribed by the law, but are economic migrants who intend to end-up in other industrialized countries, for example France, Italy, Germany, etc., searching for work opportunities and better life. In the cases when their request for international protection is rejected and they are ordered to leave Greece and EU, it is revealed that this is extremely difficult, because they refuse to implement the law and the decisions of the administration, as their aim is to settle down in the European Union.

According to the law, in case the decision of the second instance is a rejection of the application, the international protection seekers have the right to apply for cancellation before the Administrative Courts in Athens or Thessaloniki, depending on the place of issuance of the

rejection decision. This is an expensive process, used by few of the immigrants, as most of the decisions of the Administrative Courts are negative because the applicants cannot provide evidence proving the fear of pursuit in their country and the reason of leaving their homeland and coming in Greece.

The repatriation of international protection seekers whose applications have been rejected and can't initiate any other process to stay in the country, is in many cases impossible, as they do not have travel documents or have destroyed them and it is necessary to apply to their embassies, which usually don't want to cooperate. The EU - Turkey Convention on the return of foreign nationals of third countries who entered Greece from Turkey, usually doesn't apply, since Turkey doesn't want to cooperate and uses the immigrants as a tool to achieve political goals.

In this environment, the role of the lawyers providing services to international protection seekers is very difficult, as the EU grants money to them through governmental or non-governmental organizations, and the lawyers can't be paid for their services, except from lawyers who provide legal aid or are employees of non-governmental organizations.

At present, there are efforts in Greece to speed up the procedures for examining the requests for international protection, but there is no full transparency, and the applicants whose requests have been rejected, are accommodated in detention centers (close type centers), set up for the purpose of their repatriation.

There are certain cases of violation of the human rights of international protection seekers but as they don't have money and don't have political

support, no one cares about their lives and their fate. Adding that the traffickers who helped them to arrive from their homeland to Greece, reject any contact with them after bringing them to our country. It's a very bad situation for those desperate people.

**Ioannis Alavanos**, Lawyer-Member of the Athens Bar Association