



Annual Civic Space Report - 2022

Greece

By Dominka Spyratou

January 2023



Contents

Contents.....	2
Summary.....	3
Key developments	3
Institutional landscape, political and socio-economic.....	4
The regulatory environment for and implementation of civic freedoms	5
Strict requirements for CSOs working on migration remain	5
Restrictive peaceful assembly law.....	5
Several concerning laws remain, new problematic laws added	6
Safe Space.....	6
CSOs & individuals working on migrant rights targeted	6
Excessive force continuously deployed	8
Journalists: under threat.....	8
The framework for civic organisations' financial viability and sustainability.....	9
Funding for CSOs remains limited	9
The right to participation and dialogue between the sector and governing bodies	10
Participation is merely a "formality"	10
Civil society's resilience to challenges to democracy, the rule of law and fundamental rights	10
Active in tough times, with some positive victories	10
Recommendations	11
The regulatory environment for and implementation of civic freedoms	11
Safe Space	11
The framework for civic organisations' financial viability and sustainability	12
The right to participation and dialogue between the sector and governing bodies.....	12

Summary

Key developments

- 🌀 CSOs working on migrant rights face restrictions and vilification
- 🌀 Surveillance of independent journalists, a major concern
- 🌀 Protests met with police violence

Further deteriorations of civic space have been noted in 2022 in Greece which is rated “narrowed” by the CIVICUS Monitor.¹ The government has failed to implement recommendations by the European Commission in its 2022 Rule of Law report on Greece, which included to “ensure that registration requests for CSOs are proportionate” and to “establish legislative and other safeguards to improve the physical safety and working environment of journalists”.² Instead, it has continued to target civil society, particularly CSOs working on migrant rights, and it has failed to tackle the protection of journalists. The government, instead, ramped up its targeting of journalists: investigations have revealed mass surveillance of journalists and many of them continue to face attacks and SLAPPs. Worryingly, the criminalisation of solidarity has continued, with several human rights defenders on trial. People protesting have faced several repressions during protests. Despite the restrictive environment, civil society has remained vigilant and reactive.

¹ <https://monitor.civicus.org/country/greece/>

² https://commission.europa.eu/system/files/2022-07/21_1_194014_coun_chap_greece_en.pdf

Institutional landscape, political and socio-economic

In August 2022 Greece exited several years of enhanced EU surveillance which aimed to ensure that the country performed necessary reforms to avoid a new financial crisis. While reforms took place under enhanced surveillance, challenges remain in place. The performance of Greece's justice system remains one of the lowest of the EU³ while its public administration and health care system capacity are weak, with the latter being further challenged by the COVID-19 pandemic. Unemployment remains high, especially among younger people. Inflation, energy and food prices have significantly increased due to the war in Ukraine, affecting many households.

Strict COVID-19 related measures that were implemented in the last two years and which restricted various freedoms such as the freedom of peaceful assembly were lifted, nevertheless, police violence during protests and demonstrations remained high. The country dropped eight places in the 2022 Rule of Law Index compared to the previous year and 38 places in the World Press Freedom Index ranking by Reporters without Borders, receiving the lowest score in the EU.⁴ A surveillance scandal has made headlines and created political unrest as Greece is accused of using the illegal Predator spyware on several journalists, politicians and entrepreneurs.⁵ While the secret service (EYP), which the Prime Minister (PM) brought under his control after being elected in July 2019, admitted that it was monitoring certain people, the government has so far denied any wrongdoing and insists that it has not used any spyware. Nevertheless, an independent media outlet claimed that the Secretary General of the PM (and also his nephew) Grigoris Dimitriadis, who resigned after the scandal, had links to a company that trades spyware. The case was investigated by a parliamentary commission that included mostly members from the party in power, and later on by the National Transparency Authority (EAD) both of which found no misconduct. However, neither of the two bodies are truly independent and the outcomes of their investigations are questioned.⁶ Following pressure by the European Commission (EC), new investigations are currently in place.

Pushbacks of migrants and refugees continue and so do the efforts to stop or silence those who support them such as CSOs and journalists. The government is denying that such incidents are taking place despite well-documented testimonies and credible reports by international organisations including the UN Refugee Agency (UNHCR)⁷ and International Organisation for Migration (IOM),⁸ the UN Special Rapporteur on the human rights of migrants,⁹ the Council of

³ https://commission.europa.eu/system/files/2022-05/2022-european-semester-country-report-greece_en.pdf

⁴ <https://greekreporter.com/2022/07/11/greece-falls-latest-rule-law-world-index/>

⁵ <https://govwatch.gr/en/finds/parakoloythiseis-politikon-dimosiografon-kai-epicheirimation-apo-predator-kai-eyf/>

⁶ <https://www.documentonews.gr/article/plyntirio-tis-kyvernisis-i-ethniki-arxi-diafaneias/> And <https://www.balkanicaucaso.org/eng/Areas/Greece/Predatorgate-dozens-of-Greek-ministers-and-journalists-under-surveillance-221605>

⁷ <https://www.unhcr.org/news/press/2022/2/62137a284/news-comment-unhcr-warns-increasing-violence-human-rights-violations-european.html>

⁸ <https://www.infomigrants.net/fr/post/38658/iom-issues-alarm-over-deaths-on-greekturkish-border>

⁹ <https://www.statewatch.org/news/2021/june/un-special-rapporteur-report-on-the-human-rights-impact-of-pushbacks/>

Europe Commissioner for Human Rights,¹⁰ the Greek Ombudsman¹¹ and various civil society organisations.¹² Following pressure by the EC to establish an independent monitoring mechanism for violations at the country's borders, Greece designated EAD as the competent institution to investigate allegations of breaches of fundamental rights at the borders. This raised concerns as the authority does not enjoy independence, transparency, and autonomy. A three-month investigation¹³ carried out by EAD in March 2022 found no evidence of pushbacks, raising concerns about the authority's ability to act as an independent monitoring mechanism.

In December 2022 police shot and killed a Roma teenager, only a year after police killed another young Roma man. Attacks against NGOs and journalists who cover protests and migration related issues continue.

The regulatory environment for and implementation of civic freedoms

Strict requirements for CSOs working on migration remain

While no new laws were passed on freedom of association in 2022, a Joint Ministerial Decision, which in 2020 introduced strict requirements for the operation of CSOs working on migration in Greece, is still in place. The law makes it difficult for these organisations to register, consequently hindering their operations. Various domestic and international bodies have raised concerns¹⁴ about the compatibility of the legislation with the country's legal obligations, nevertheless, Greece insists on implementing it. For more on the application of this law, see section on safe space.

Restrictive peaceful assembly law

New concerning legislation that regulates public outdoor assemblies was introduced in January 2021. The law (4703/2020), among other issues, gives authorities the discretionary power to disperse or prohibit assemblies. In July 2022, the mayor of Athens requested from the Ministers of Interior and Citizens Protection the right to license -and therefore limit- assemblies in the country's capital.

15

¹⁰ <https://www.coe.int/en/web/commissioner/-/greek-authorities-should-investigate-allegations-of-pushbacks-and-ill-treatment-of-migrants-ensure-an-enabling-environment-for-ngos-and-improve-recept>

¹¹ https://rsaegean.org/wp-content/uploads/2022/06/Greece_CS0_Briefing_LIBE-1.pdf

¹² <https://rsaegean.org/en/joint-action-against-push-backs-signed-by-49-ngos/>

¹³ <https://eu.rescue.org/press-release/greeces-national-transparency-authority-should-publish-its-full-report-regarding>

¹⁴ <https://rsaegean.org/en/registry-of-ngos-working-with-refugees-and-migrants-in-greece-under-scrutiny/>

¹⁵ <https://govwatch.gr/en/finds/ripsi-chimikon-simeiothike-sti-synaylia-diamartyrias-toy-thanasi-papakonstantinoy-sto-apth/>



Several concerning laws remain, new problematic laws added

A November 2021 law makes ‘fake news’ punishable with up to five years in prison.¹⁶ In December 2022 the country adopted new legislation that will create a committee to monitor whether the principles of journalistic ethics and conduct have been observed. If not, media organisations may be removed from the registry and may be excluded from state funding.¹⁷ The scientific committee of the parliament, among others, expressed concerns that the law may affect freedom of expression and lead to censorship. In November 2022, Greece also adopted a long overdue whistle-blower protection law, almost a year after the EC’s set deadline for the transposition of the EU Directive on Whistleblowing. The EC pressured Greece to adopt the law following the prosecution of two journalists whose investigations uncovered a scandal about Novartis, a pharmaceutical company. Overall, the process was slow, lacked transparency and did not include consultations with CSOs or other stakeholders, who believe that the law is weak and fails to ensure adequate protection.

An amendment to a law regarding the confidentiality of communications, which was adopted in March 2021, allows the National Intelligence Service (EYP) to monitor citizens without them being notified about it.¹⁸ Cases of surveillance, including against journalists conducting investigative work, people working with refugees and others have increased significantly in recent years and especially after the adoption of the amendment.¹⁹ Journalists who covered the Predatorgate surveillance scandal were also allegedly placed under surveillance by state authorities during 2022.²⁰ Following this, in December 2022 the government amended the surveillance law, via the bill on suspending the confidentiality of communications, cybersecurity and the protection of citizens’ personal data. However, after limited public consultation, it only includes minor “cosmetic” improvements and remains problematic.²¹

Safe Space

CSOs & individuals working on migrant rights targeted

In 2021 the government rejected the registration application of the NGO Refugee Support Aegean (RSA). However, following criticism of the decision by the Greek Ombudsperson and CSOs, among others, the Ministry of Migration and Asylum accepted a new application by RSA in 2022.

RSA is not the only case of government interference with the work of CSOs. Using various tactics, authorities often target organisations particularly those that work on migration issues or that openly criticise the government. A recent Law (4825/2021 article 40) criminalises rescue

¹⁶ <https://www.hrw.org/news/2021/11/17/greece-alleged-fake-news-made-crime>

¹⁷ <https://www.mapmf.org/alert/25509>

¹⁸ <https://www.hrw.org/news/2022/12/08/greece-problematic-surveillance-bill>

¹⁹ <https://balkaninsight.com/2021/11/16/greek-state-spies-on-journalists-lawyers-civil-servants-report/>

²⁰ <https://govwatch.gr/en/finds/apokalypseis-gia-parakoloythiseis-dimosiografon-poy-ereynoyntis-ypoklupes/>

²¹ <https://rsf.org/en/greece-s-predatorgate-draft-law-surveillance-falling-short-european-standards-must-be-amended>

operations, particularly maritime search and rescue operations. Organisations that engage in such activities were forced to terminate them due to fear of being prosecuted.

Furthermore in 2022, four NGOs²² that have brought a total of 13 cases to the European Court for Human Rights and achieved interim measures for refugees at risk of being pushed back, were put under investigation for “possible links to smuggling”. In September 2022, the Ministry of Migration and Asylum, accused the Greek NGO Human Rights 360 and a journalist of lying when they reported on the death of a little girl at Greece’s borders, threatening the organisation with de-registration, fines and other legal measures. It also launched a financial investigation against the organisation whose reputation was severely affected following the incident.²³ More recently, in December 2022, the government also accused well-known human rights defender (HRD) Panayote Dimitras of “setting up a criminal organisation with the purpose of facilitating the illegal entry and stay in Greece of third-country nationals”. Following interrogation, the HRD was prohibited from being involved with his organisation (Greek Helsinki Monitor) while other measures, including house arrest, are pending.²⁴ On 10th January 2023, the trial of Sarah Mardini, Seán Binder, Nassos Karakitsos and another 21 aid workers began. Their case is ongoing since 2018 after they were part of a search and rescue team on the Greek island of Lesbos. The three volunteers have spent over three months in pre-trial detention and are accused of helping refugees flee danger. They have been facing misdemeanour charges, including espionage and forgery. While some charges were recently dropped, the felony charges, which can carry up to 10 years in prison for each person ‘facilitated’ to enter Greece remain, with no trial date being set yet.²⁵

In addition to CSOs, people on the move themselves are being criminalised for seeking protection on European territory and some of them have been charged with lifelong imprisonment sentences.²⁶ In May 2022, the ‘Samos2’²⁷ trial took place, where a young father faced charges for the drowning of his 6-year-old son during a shipwreck (endangering the life of his child) and would have faced a ten-year prison sentence, while one of his co-passengers faces life imprisonment for steering the boat. The father was acquitted, while the co-passenger was given a suspended sentence²⁸. Furthermore, three Syrian nationals were recently sentenced to a combined 439 years in prison for “facilitating unauthorised entry”, while another group of Syrian nationals was sentenced to 364 years of imprisonment by the court in Kalamata “for complicity in transferring into Greece third-country nationals”.²⁹ As pushbacks continue, there are concerns that such practices will increase.

²² <https://www.newsit.gr/ellada/evros-ereyna-gia-ti-drasi-mko-kai-ti-syndesi-tous-me-ta-kyklomata-paratypon-metanaston/3534121/>

²³ <https://www.koraki.org/post/evros-islet-not-turkish-after-all>

²⁴ <https://rsaegian.org/en/the-attempt-to-silence-human-rights-defenders-continues/>

²⁵ <https://www.newarab.com/analysis/how-greece-putting-refugee-solidarity-trial>

²⁶ <https://www.borderline-europe.de/eigene-publikationen/stigmatisiert-inhaftiert-kriminalisiert-der-kampf-gegen-vermeintliche-schleuser?l=en>

²⁷ <https://freethesamostwo.com>

²⁸ <https://www.infomigrants.net/en/post/40616/afghan-man-acquitted-over-sons-death-on-journey-to-greece>

²⁹ <https://ecre.org/greece-crack-down-on-ngos-and-criminalisation-of-solidarity-continues-government-announces-blocking-thousands-of-arrivals-in-evros-amid-new-pushback-reports/>

Excessive force continuously deployed

The use of police violence during assemblies is particularly worrying. For instance, on 6th April 2022, police used violence and arrested protestors in Thessaloniki,³⁰ the country's second largest city. In the same city, the police repeatedly used³¹ violence against university students protesting against police presence at universities, which was made mandatory via an education bill.³² Other incidents included riot police attacks and injuries and arrests of demonstrators in Athens³³ during several occasions and the arrest of a councillor during a solidarity march.³⁴ The unjustified use of chemicals during a protest concert was also reported.³⁵

Journalists: under threat

Threats against journalists continue. The murder of reporter Giorgos Karaivaz in 2021 remains unpunished despite the government's promise to resolve the case promptly. Police violence targeting journalists covering demonstrations is still frequent.³⁶ Furthermore, in November 2022 well-known photojournalist Nikos Pilos was arrested and detained during a police operation and 10 criminal charges were filed against him.³⁷ Journalists are often prevented from covering issues including migration and COVID-19. Strategic Lawsuits Against Public Participation (SLAPPs) are also on the rise,³⁸ in particular from multinational companies and executives, but there is no legislation to protect civil society and journalists from such lawsuits. In one case in September 2022 the director of a state hospital launched legal proceedings against journalist Ioannis Stevis who reported on the hospital's management of public funds.³⁹ The PM's former Secretary General and nephew Grigoris Dimitriadis took the same course of action against several journalists who reported on his involvement in the surveillance scandal.⁴⁰

³⁰ <https://govwatch.gr/en/finds/astynomiki-via-kata-apergiakis-kinitopoiisis/>

³¹ <https://monitor.civicus.org/updates/2022/06/30/protests-academic-freedom-met-excessive-force-journalist-under-surveillance/> and <https://monitor.civicus.org/updates/2022/09/30/university-protests-against-riot-police-deployment-continue-predator-gate-scandal-raises-further-concerns-about-surveillance/>

³² <https://govwatch.gr/en/finds/aythaireti-syllipsi-amp-xylodarmos-foititon-sto-apth/>

³³ <https://govwatch.gr/en/finds/xylodarmos-diadilonton-sta-exarcheia/> ; <https://govwatch.gr/en/finds/poreia-allileggyis-ston-g-michailidi-kataggelies-gia-via-kata-diadilonton/> ; <https://govwatch.gr/en/finds/astynomiki-via-kata-diadilonton-se-antikatastaltiki-poreia/> ; <https://govwatch.gr/en/finds/astynomiki-via-kata-diadilonton-sti-poreia-kata-tis-akriveias/> ; <https://govwatch.gr/en/finds/astynomiki-via-kata-diadilonton-se-diadilos-sta-sepolia/> ; <https://govwatch.gr/en/finds/astynomiki-via-kata-diadilontrias-se-poreia-kata-tis-panepistimiakis-astynomias/>

³⁴ <https://govwatch.gr/en/finds/poreia-allileggyis-ston-g-michailidi-via-kata-dimotikoy-symvoyloy/>

³⁵ <https://govwatch.gr/en/finds/ripsi-chimikon-simeiothike-sti-synaylia-diamartyrias-toy-thanasi-papakonstantinoy-sto-apth/>

³⁶ <https://govwatch.gr/en/finds/astynomiki-via-kata-enos-amerikanoy-fotoreporter-kai-diadilonton/> , <https://govwatch.gr/en/finds/poreia-allileggyis-ston-g-michailidi-kataggelies-gia-via-kata-dimosiografon/> and <https://govwatch.gr/en/finds/synelavan-dimosiografo-epeidi-kategrapse-viaii-syllipsi-gynaikas/>

³⁷ <https://balkaninsight.com/2022/11/23/greek-police-filed-criminal-charges-to-photojournalist-while-reporting-in-athens/>

³⁸ <https://ipi.media/greece-journalists-targeted-in-several-slapp-lawsuits/>

³⁹ <https://govwatch.gr/en/finds/agoges-kai-minysi-se-varos-dimosiografoy-apo-ti-dioikitria-toy-nosokomeiyo-chiyo/>

⁴⁰ <https://europeanjournalists.org/blog/2022/08/06/greece-efj-demands-full-disclosure-on-illegal-surveillance-of-journalists/>

Lack of media pluralism is also a challenge, with the journalists' union criticising the Athens news agency for presenting only the government's position on various issues.⁴¹ More broadly, the current government has strong links to and control of the media affecting overall pluralism and the public's opinion.⁴²

On a more positive note, in June 2022 the Supreme Court found four journalists, who revealed the Novartis scandal, innocent. The journalists were facing a prison sentence of up to 20 years. Also, in January 2022 the Athens Administrative Court of Appeal recognised Vouliwatch's (an NGO watchdog) right to receive a list with information about the media outlets that received government funds for an anti-COVID-19 advertisement campaign. The NGO as well as other civil society actors were concerned that the funds were not distributed evenly. Nevertheless, both the government and the National Transparency Authority (EAD) refused to share this information, even after the court ruling.⁴³

The framework for civic organisations' financial viability and sustainability

Funding for CSOs remains limited

2022 was yet another year during which developments in Greece prove that civic space and civil society's ability to act are shrinking. The government's hostile stance and negative narrative towards CSOs affects public trust, which was already low due to various historical reasons,⁴⁴ while its control of most mainstream media leaves little space for alternative voices to be heard. As elections are planned for spring 2023 the government in power may intensify such efforts and try to silence civic actors who are seen as a threat to its re-election.

At the same time, CSOs in Greece have limited access to funding and in particular national resources, which affects their sustainability, planning and impact. Funding opportunities by the state are limited which is also due to the fact that the government has yet to take adequate measures to include CSOs in the planning, monitoring and implementation of EU Funds, as per the EC's guidelines. Other sources of funding are usually project-based, preventing long-term planning and affecting growth and viability. New strict registration requirements, without which CSOs cannot access national resources, or receive certain benefits such as tax exemptions, are also a threat to the sector's viability.

⁴¹ <https://govwatch.gr/en/finds/anakoinosi-tis-esiea-gia-elleipsi-polyfonias-sto-ape-mpe/>

⁴² <https://eu.boell.org/en/2021/06/07/state-and-corporate-capture-media-threaten-quality-democracy-greece>

⁴³ <https://ipi.media/greece-transparency-authority-must-comply-with-court-ruling-on-media-advertising-campaign/>

⁴⁴ <https://www.eliampe.gr/wp-content/uploads/2014/05/kas.pdf>



The right to participation and dialogue between the sector and governing bodies

Participation is merely a “formality”

More broadly, a meaningful dialogue framework and cooperation between Greek governments and CSOs was never in place and remains lacking. While various committees and bodies exist in specific policy areas, they often convene sporadically, and civil society actors are not always included or adequately represented. Public consultations which take place through a consultation portal, where draft laws and policies are published for comments, remain the main mechanism through which civil society organisations can provide feedback. However, civil society and other stakeholders are often not involved in the consultation process prior to the publication of the drafts, and, even then, the timeframe for submission of comments is limited. These consultations are not usually substantial nor effective, but rather a tick box exercise as feedback is not incorporated in the various documents.

Civil society's resilience to challenges to democracy, the rule of law and fundamental rights

Active in tough times, with some positive victories

Despite the difficulties -or because of them- civil society has been very active in recent years, especially following the economic and refugee crises and during COVID-19. New initiatives are emerging to support people in need and defend democracy and the rule of law (Golden Dawn Watch,⁴⁵ Vouliwatch,⁴⁶ Govwatch⁴⁷ are a few examples). In recent years independent investigative media, such as Reporters United,⁴⁸ We are Solomon⁴⁹ and Lighthouse Reports,⁵⁰ have also emerged to put pressure on the government and try to hold it accountable.

While in these challenging times it is often hard to spot or acknowledge positive developments, there were occasions in 2022 that showcase the important role of civic actors. Examples include civil society's reports on pushbacks which put Greece on the spotlight, positive court decisions about the innocence of migrants accused of smuggling and who were defended by CSO lawyers (for example the 'Samos 2' case) and reports by journalists about the Predatorgate surveillance scandal. Furthermore, student protests have temporarily put on hold the establishment of police

⁴⁵ <https://goldendawnwatch.org/>

⁴⁶ <https://vouliwatch.gr/about/en>

⁴⁷ <https://govwatch.gr/en/>

⁴⁸ <https://www.reportersunited.gr/en/>

⁴⁹ <https://wearesolomon.com/>

⁵⁰ <https://www.lighthousereports.nl/>

in universities, while the eviction of a pensioner journalist from her home⁵¹ was prevented due to strong support and demonstrations by citizens.

To achieve their goals CSOs often work with independent authorities such as the Ombudsperson, journalists, academics or other civic actors. An example is the Informal Forced Returns Recording Mechanism that was established in 2022 to record pushbacks which includes 10 NGOs and is supervised by the National Commission for Human Rights (NCHR).⁵²

Recommendations

The regulatory environment for and implementation of civic freedoms

- ✎ Repeal the Joint Ministerial Decision 10616/2020 for CSOs working on migrant and refugee rights;
- ✎ Scrap the proposal to create a committee to monitor whether the principles of journalistic ethics and conduct have been observed which encourages censorship;
- ✎ Amend the bill on suspending the confidentiality of communications, cybersecurity and the protection of citizens' personal data by engaging in thorough consultation with civil society;
- ✎ Scrap the law (4703/2020) which restricts the right to peaceful assembly.

Safe Space

- ✎ Drop all charges against Sara Mardini, Seán Binder, Nassos Karakitsos and refrain from further prosecutions against them;
- ✎ Refrain from criminalising human rights defenders solely for helping refugees and migrants in need;
- ✎ Immediately carry out a thorough and independent investigation into the arbitrary surveillance on journalists;
- ✎ Conduct thorough investigations into violence against journalists and media, and adopt new protective measures to ensure their safety;
- ✎ Protect civil society, by recognising the services provided by CSOs to marginalised groups and society as a whole;

⁵¹ <http://www.idcommunism.com/2022/11/greece-peoples-solidarity-stops-seizure-of-pensioners-home-by-the-banks.html>

⁵² <https://www.nchr.gr/en/news/1544-press-release-presentation-of-the-recording-mechanism-of-incidents-of-informal-forced-returns-and-its-first-interim-report.html>



- ⑩ Refrain from publically vilifying civil society and sharing negative public narratives about them;
- ⑩ Respect the right to peaceful assembly and ensure its free exercise without discrimination, allow assemblies to take place without unwarranted interference and ensure that protesters are protected.

The framework for civic organisations' financial viability and sustainability

- ⑩ Provide financial support to the NGO sector, including through EU funding, and increase clarity and transparency around EU funding and opportunities for NGOs participation;
- ⑩ Take adequate measures to include CSOs in the planning, monitoring and implementation of EU Funds, as per the EC's guidelines.

The right to participation and dialogue between the sector and governing bodies

- ⑩ Strengthen the role of civil society actors in policymaking, by supporting an open, transparent and regular dialogue between civil society and policymakers at national and EU levels;
- ⑩ Improve the operational framework for CSOs, following a meaningful consultation process with them, to ensure their effective protection against attacks and other forms of harassment;
- ⑩ Promote transparency and accountability within the government and government bodies.

** About the contributor:*

Dominika Spyratou is a human rights consultant. Her work focuses on the protection of the rights of people on the move and other vulnerable groups.