



Common Template of EMN Study 2020

Accurate, timely, interoperable? Data management in the asylum procedure

National Contribution from *SLOVENIA*¹

Disclaimer: The following information has been provided primarily for the purpose of contributing to a synthesis report for this EMN study. The EMN NCP has provided information that is, to the best of its knowledge, up-to-date, objective and reliable within the context and confines of this study. The information may thus not provide a complete description and may not represent the entirety of the official policy of the EMN NCPs' Member State.

Top-line factsheet [max. 2 pages]

*The top-line factsheet will serve as an overview of the **national reports** introducing the study and drawing out key facts and figures from across all sections, with a particular emphasis on elements that will be of relevance to (national) policy-makers.*

Please provide a concise summary of the main findings of Sections 1-7:

The Slovenian national legislation **distinguishes phases of making, registering and lodging** of an application, which is also evident in practice. A third country national or a stateless person may express their intent of applying for asylum before any public authority or self-governing local community authority in the Republic of Slovenia, who then informs the Police. **The Police** is the first national authority who records an asylum request and collects data from an applicant. After they have concluded registration within the preliminary asylum procedure, they transfer an asylum seeker to the national asylum centre, where the second authority (**Ministry of the Interior**) continues conducting the procedure.

There are no specific national **time frames** determined in the legislation **from making to lodging** an application, but in practice the time between each phase is as short as possible. In 2018 and 2019 the average time from making to lodging was **3–7 days**. There is, however, a national time limit **for examining** an application in the first instance. The International Protection Act foresees **6 months** for a regular procedure and **2 months for an accelerated procedure**, with possible further prolongations in specific circumstances.

Authorities involved in the asylum procedure are the **Police** and the **International Protection Procedures Division (IPPD)** within the Migration Directorate of the Ministry of the Interior. As already explained, the Police oversees registration, while the IPPD is legally competent for lodging (case officers) and examining applications (decision makers). These two authorities also **collect information** from asylum seekers during the asylum procedure. Most of the data is gathered during the lodging phase, through a face-to-face interview, and is stored in an electronic file (in a database). Some of the data is re-used, especially in the examination phase, where the newly collected information includes mostly newly established facts or providing new evidence, such as identification documents.

The Police stores the collected personal information in the Central Police Database and provides the Ministry of the Interior with a copy of the registration form they had completed during registration, together with the

¹ Replace highlighted text with your **Member State** name here.

applicant's statement of reasons for applying for asylum, a report about an established identity and a route from the destination country to the Republic of Slovenia, and all relevant submitted documents and/or certificates. IPPD officials then also collect data from the applicant, taking into account information and documents received from the Police.

During the **registration phase**, the Police **cross checks** data against the national/central Police database, SIS, SLTD/INTERPOL database, and EURODAC. No processing/privacy notice about the personal data collected in this phase is provided to asylum applicants. However, guidelines are provided to staff responsible for data management with regard to information collected. Also, the quality of the collected data is assessed during this phase using a software application.

During the **lodging phase**, data is cross-checked against data taken by the Police at the registering phase and compared to data from a potential EURODAC hit. No processing/privacy notice about the personal data collected in this phase is provided to asylum applicants and no guidelines are provided to staff responsible for data management with regard to information collected.

During the **examination phase**, collected information is cross-checked against information available on different portals/public databases in order to ensure objectivity and neutrality of the information. The main challenge here is the lack of specific information available and the language of such information. No processing/privacy notice about the personal data collected in this phase is provided to asylum applicants and no guidelines are provided to staff responsible for data management with regard to information collected.

Different **safeguards** are applied for **data protection supervision** of the personal data collected during the asylum procedure. The Police apply **internal audit**. Their database has its own features of data protection, keeping logs of the data use and access, prevention against unauthorised data use and access, and logs regarding the reason for use and access. Similarly, within IPPD **limited access** to databases is provided to officials, with some databases keeping logs of use and reasons for use. All IPPD officials are **authorised** for conducting the asylum procedure and decision making by the minister. There are also regular audits conducted by the **national data protection authority**. Moreover, if an asylum applicant wishes to **access, rectify or erase their data**, existing legal provision allow them to do so. However, this rarely happens in practice.

The Slovenian asylum authorities have experienced some **challenges** related to data management, including lack of human and technical resources, legal obstacles, interoperability of databases, and lack of translators/interpreters.

Since 2014, there have been **no major transformations** related to data management. Nevertheless, some improvements and updates were provided according to the needs identified in practice.

A **contingency plan** was adopted by the Government in 2016, while updates are foreseen in the near future due to the constantly rising number of asylum seekers. It deals mostly with standard measures regarding the increased work (new employments, reallocation of human resources, additional accommodation facilities, etc.), and does not touch upon data management specifically.

Section 1: The asylum procedure

Please note that the data management aspects of each phase of making, registering, lodging and examining an asylum claim will need to be described in more detail in the following Sections. This introductory Section shall serve as a first overview to better understand the following sections on data management within each phase. If your (Member) State has implemented specific procedures (e.g. 'airport procedure') that deviate from the usual procedure(s), please point this out. However, (Member) States may decide on their own, into how much depth they want to go with regard to such specific or more exceptional procedures. In case (Member) States decide not to elaborate in more detail on specific procedures but focus more on their 'general asylum procedure', a reference can be made to the fact that the specific procedure will not be further elaborated in order to reduce the complexity of the study.

1.1 Overview of the asylum procedure

Please provide an overview on the regular asylum procedure in your (Member) State by answering the following questions.

1. Does your (Member) State clearly distinguish in national legislation among the abovementioned phases of **making, registering** and **lodging** of an application? (clear distinction – see the background section 7 - Definitions)

Yes / No

If yes, please elaborate briefly.

International protection in Slovenia is covered by the International Protection Act (Official Gazette of the Republic of Slovenia, No. 16/17 - official consolidated text). The International Protection Act (IPA) does not specifically mention making and registering of an application, however equivalent phases are established. Making of an application is equivalent to a person expressing his/her intention to apply for international protection before any public authority or self-governing local community authority in the Republic of Slovenia (Article 42(1) of IPA). A preliminary procedure follows, where the police process the person expressing intent by establishing the person's identity and the route by which the person came to Slovenia, and by completing the registration form (Article 42(2)) – that is equivalent to registering of an application. The lodging phase is clearly distinguished in Articles 44 and 45.

If no, please briefly describe the different phases of the asylum procedure in your (Member) State. **N/A.**

2. a) Does your (Member) State clearly distinguish in practice among the abovementioned phases of **making, registering** and **lodging** of an application? (clear distinction – see background section 7 - Definitions)

Yes / No

If no, please briefly describe the different phases of the asylum procedure in your (Member) State specifying whether in practice some of the abovementioned phases are merged/overlapping. **N/A.**

b) in practice, are there any differences in the division of the phases based on the different types of entry routes (i.e. land, sea, air)? For Member States implementing the **hotspot approach**, does this distinction hold in the hotspots? **N/A.**

3. a) Does 'channelling' of specific caseloads take place in the asylum procedure of your (Member) State?

Channelling: Yes / No

If yes, please elaborate how the asylum procedure is organised, in relation to the single channels/tracks. **N/A.**

b) Did your (Member) State introduce any changes on 'channelling' since 2014? **N/A.**

If so, please describe the change(s) and intended purpose. If applicable and feasible, please also refer to findings of studies or evaluations on these changes made. **N/A.**

4. a) Are there any national time frames/limits for each of the single phases (making, registering, lodging and examining a claim) in the context of Article 6 of the recast Asylum Procedures Directive?²

² Directive 2013/32/EU (NB Denmark and Ireland do not participate in the recast Asylum Procedures Directive).

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Yes / No

If yes, please describe and specify the time frames/limits for the phases applicable in your (Member) State. **N/A.**

b) Did your (Member) State introduce any changes in the national timeframes / limits in the years since 2014? **No.**

If so, please describe the change(s) and intended purpose. If applicable and feasible, please also refer to findings of studies or evaluations on these changes made. **N/A.**

5. a) In practice, how long does the procedure take from an asylum applicant making an application to lodging the application (average days)?

Table 1

Year	Average duration (days) from making to lodging a claim ³
2014	1-3 days
2015	1-3 days
2016	1-5 days
2017	1-5 days
2018	3-7 days
2019	3-7 days

b) In practice, how long does the procedure take from lodging the application until a first instance decision is made (average days)? If information is not available, please indicate legal time limits and an indication that these are legal limits.

In case your (Member) State applies 'channelling', please specify the average time for each channel (average days; and please add additional columns in case more Channels apply). If (Member) State rather differentiates between special procedures in place (such as fast track procedures) and/or if these are interconnected with the 'channelling' please add additional columns and elaborate in a footnote what the special procedure is about – if not yet done so in Chapter 1.1)

Table 2

Year	From lodging until first time decision				
	Average days Legal time limits	Channel 1 (please specify)	Channel 2 (please specify)	Channel 3 (please specify)	Channel 4 (please specify)
2014	/	-	-	-	-
2015	/	-	-	-	-
2016	6 months regular procedure, 2 months accelerated procedure	-	-	-	-
2017	6 months regular procedure, 2 months accelerated procedure	-	-	-	-
2018	6 months regular procedure, 2 months accelerated procedure	-	-	-	-

³ In case there is no information on the exact average duration, please include estimates about the average duration.

2019	6 months regular procedure, 2 months accelerated procedure	-	-	-	-
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1.2 Authorities involved in the asylum procedure

6. Which authorities are involved in and responsible for the asylum procedure from making an application to first instance decision?

Please indicate whether those authorities are legally competent for registering an asylum application or not. For those authorities which are not, please also see Section 2.1

Table 3

Type of Authority	Specify name of the authority involved in <u>making</u> an application	Legally competent for <u>registering</u> an asylum application (please indicate type of authority and specify name)	Legally competent for <u>lodging</u> an asylum application (please indicate type of authority and specify name)	Legally competent for <u>examining</u> an asylum application (please indicate type of authority and specify name)
Border Police	✓ (see "others" below in this table)	Police stations around Slovenia		
Local Police	✓ (see "others" below in this table)	Police Stations around Slovenia		
(Branch) office for Refugees	✓ (see "others" below in this table)			
Ministries (Interior, Justice, etc.)	✓ (see "others" below in this table)		Ministry of the Interior, Migration Directorate, International Protection Procedures Division (case officers)	Ministry of the Interior, Migration Directorate, International Protection Procedures Division (decision makers).
Local Citizen's Office/Mayor of a local city/town	✓ (see "others" below in this table)			
(Local) immigration office	✓ (see "others" below in this table)			
(Shared) accommodation for refugees				
EU Agency				
International Organisation				
Detention facility	✓ (see "others" below in this table)			
Reception centre	✓ (see "others" below in this table)			

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Type of Authority	Specify name of the authority involved in <u>making</u> an application	Legally competent for <u>registering</u> an asylum application (please indicate type of authority and specify name)	Legally competent for <u>lodging</u> an asylum application (please indicate type of authority and specify name)	Legally competent for <u>examining</u> an asylum application (please indicate type of authority and specify name)
Others (please specify)	any public authority or self-governing local community authority in the Republic of Slovenia			

1.3 Data collected during the asylum procedure

7. Which information is gathered during the asylum procedure at the different phases and by whom? Please, fill Table 4 below.

Table 4

1. Categories of data collected	2. In which phase(s) is this information collected? (including self-registration) - Registering (1) - self-registration (1.1) - lodging (2) - examination (3) <i>Please use the numbers provided for each phase to indicate the phase the data is collected. In case phases are combined in your state, please indicate it accordingly by using a dash (see example below). If data is re-used but not re-collected in a following phase, data is not collected in that phase. Therefore, if data is not collected in a specific phase but only re-used or not used at all, please do not add any number for that phase.</i>	3. Which organization collects this information in each of the different phases? <i>(whenever possible please refer to the authorities listed in section 1.2)</i>	4. How is this particular category of data /biometric data collected? - online self-registration - written questionnaire (in paper) - oral (interview, face-to-face) - oral (interview via phone/ videocall) - open source (e.g. social media) - analysing documents - analysing content of mobile devices (e.g. phones, laptops) - using automated or artificial intelligence for analysis of data - other: please specify (multiple answers possible) <i>If different data collection tools are used in the different phases, please specify it. If possible, please indicate if any specific technology is used in the process.</i>	5. Where is this particular category of data /biometric data stored? - in an electronic file - in a database - on paper	6. If applicable, please specify the name of the database(s)
Name					
- <i>current name</i>	(1) and (2)	Police and Ministry of the Interior	Interview	Electronic	Central Police Database, Asylum Register, Asylum Documents
- <i>birth name</i>	(1) and (2)	Police and Ministry of the Interior	Interview	Electronic	Asylum Register, Asylum Documents
- <i>previous name(s)</i>	(1) and (2)	Police and Ministry of the Interior	Interview	Electronic	
- <i>pen name (alias)</i>	(1) and (2)	Police and Ministry of the Interior	Interview	Electronic	
- <i>religious names</i>					

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- <i>other names</i>					
Sex	(1) in (2)	Police and Ministry of the Interior	Interview	Electronic	Central Police Database, Asylum Register, Asylum Documents
Biometric data					
- <i>photo</i>	(1) and (2)	Police and Ministry of the Interior	Interview	Electronic	Asylum Documents
- <i>fingerprints (which fingers, rolled or pressed fingerprints)</i>	(1) - index finger; and (2)	Police and Ministry of the Interior	Interview	Electronic	Central Police Database, Eurodac database
- <i>iris scan</i>					
- <i>other</i>					
Eye colour					
Height					
Date of birth	(1) and (2)	Police and Ministry of the Interior	Interview	Electronic	Asylum Register, Asylum Documents
Citizenship(s)	(1) and (2)	Police and Ministry of the Interior	Interview	Electronic	Asylum Register, Asylum Documents
Country of origin	(1) and (2)	Police and Ministry of the Interior	Interview	Electronic	Asylum Register, Asylum Documents
Place of birth					
- <i>town</i>	(1) and (2)	Police and Ministry of the Interior	Interview	Electronic	Asylum Register
- <i>region</i>	(1) and (2)	Police and Ministry of the Interior	Interview	Electronic	Asylum Register
- <i>country</i>	(1) and (2)	Police and Ministry of the Interior	Interview	Electronic	Asylum Register

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- <i>other</i>					
Date of arrival in the (Member) State	(1) and (2)	Police and Ministry of the Interior	Interview	Electronic	
Last place of residence in the country of origin	(2)	Ministry of the Interior	Interview	Electronic	
Last place of residence before entry in the (Member) State					
Contact details					
- <i>phone number</i>					
- <i>email address</i>					
- <i>current address</i>					
- <i>other</i>					
Civil status					
Accompanied by:					
- <i>spouse or civil partner</i>	(2)	Ministry of the Interior	Interview	Electronic	
- <i>children</i>	(2)	Ministry of the Interior	Interview	Electronic	
- <i>parents</i>	(2)	Ministry of the Interior	Interview	Electronic	
- <i>other relatives</i>	(2)	Ministry of the Interior	Interview	Electronic	
Family members in the (Member) State					
- <i>name</i>	(2)	Ministry of the Interior	Interview	Electronic	
- <i>residency</i>	(2)	Ministry of the Interior	Interview	Electronic	
- <i>citizenship</i>	(2)	Ministry of the Interior	Interview	Electronic	
- <i>other</i>	(2)	Ministry of the Interior	Interview	Electronic	
Family members in another (Member) State	(2)	Ministry of the Interior	Interview	Electronic	

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Close relatives in the (Member) State	(2)	Ministry of the Interior	Interview	Electronic	
Close relatives in another (Member) State	(2)	Ministry of the Interior	Interview	Electronic	
Health status					
- specifics on health status	(2)	Ministry of the Interior	Interview	Electronic	
- reference that a general health check has been carried out					
- other					
Education					
- school attendance	(2)	Ministry of the Interior	Interview	Electronic	
- academic studies	(2)	Ministry of the Interior	Interview	Electronic	
- trainings	(2)	Ministry of the Interior	Interview	Electronic	
- apprenticeships	(2)	Ministry of the Interior	Interview	Electronic	
- non-formal work experience	(2)	Ministry of the Interior	Interview	Electronic	
- other					
Language skills	(2)	Ministry of the Interior	Interview	Electronic	
Profession	(2)	Ministry of the Interior	Interview	Electronic	
Criminal record	(2)	Ministry of the Interior	Interview	Electronic	
Financial resources	(2)	Ministry of the Interior	Interview	Electronic	
Supporting documents					
- passport	(2) and/or (3)	Ministry of the Interior	Interview	Electronic	SPIS 4
- travel document	(2) and/or (3)	Ministry of the Interior	Interview	Electronic	SPIS 4
- other	(2) and/or (3)	Ministry of the Interior	Interview	Electronic	SPIS 4
Reasons for fleeing	(2) and/or (3)	Ministry of the Interior	Interview	Electronic	SPIS 4

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Reasons for not wanting to be returned to the competent Member State as part of a Dublin procedure	(2) and/or (3)	Ministry of the Interior	Interview	Electronic	SPIS 4
Previous applications	(2)	Ministry of the Interior	Interview	Electronic	SPIS 4
Information on the route taken	(2)	Ministry of the Interior	Interview	Electronic	SPIS 4
Information on exclusion grounds	(2) and/or (3)	Ministry of the Interior	Interview	Electronic	SPIS 4
Religious affiliation	(2) and/or (3)	Ministry of the Interior	Interview	Electronic	SPIS 4
Vulnerabilities					
- <i>Unaccompanied minor</i>	(2)	Ministry of the Interior	Interview	Electronic	Asylum Register
- <i>Pregnant</i>	(2)	Ministry of the Interior	Interview	Electronic	Asylum Register
- <i>Disabilities (which?)</i>	(2)	Ministry of the Interior	Interview	Electronic	Asylum Register
- <i>Elderly</i>	(2)	Ministry of the Interior	Interview	Electronic	Asylum Register
- <i>Single parent with minor child(ren)</i>	(2)	Ministry of the Interior	Interview	Electronic	Asylum Register
- <i>Victims of human trafficking</i>	(2)	Ministry of the Interior	Interview	Electronic	Asylum Register
- <i>Mental disorders</i>	(2)	Ministry of the Interior	Interview	Electronic	Asylum Register
- <i>Victims of torture, physical or sexual violence (female genital mutilation)</i>	(2)	Ministry of the Interior	Interview	Electronic	Asylum Register
- <i>other</i>	(2)	Ministry of the Interior	Interview	Electronic	Asylum Register
Other (please specify)	(3) when personal data (name, address, etc.) have changed, they can be reported and changed subsequently, but only by submitting a document as proof	Ministry of the Interior	Interview, written request	Electronic	SPIS, Asylum Register

8. Has your (Member) State identified any good practice in frontloading information collected by other authorities not directly connected to the asylum procedure? If yes, please elaborate and specify in which phase does the frontloading take place.

No.

For each good practice mentioned, please describe a) for whom it is a good practice, b) why it is considered a good practice and c) what is the source of the statement – (please indicate sources)

1.4 Data management during the asylum procedure

9. Please fill Table 5 based on the information given in column 6 of Table 4 (filling as many rows as the databases indicated that Table).

Table 5

Database	Overview/definition of the database (please indicate whether it is a regional, national or European database).	National authorities that have access to the databases or access to its data ⁴			Data shared with other Member States (apart from the data that (Member) States share through EU databases e.g. Eurostat, VIS, SIS)	
		Name of authority/ organisation	In which phase of the asylum procedure	For what purpose	Type of data	For what purpose
(Database 1)	Asylum Register (<i>Azilni register</i>)	Ministry of the Interior – Migration Directorate	Lodging and examination	To store an application, personal data, status, deadlines, accommodation.	/	/
(Database 2)	SPIS 4	Ministry of the Interior – Migration Directorate	All phases	Electronic files with all scanned documents.	/	/
(Database 3)	Asylum Documents (Asylum management database)	Ministry of the Interior and the Government Office for the support and integration of migrants (reception authority). Both, the asylum and the reception authority are	All phases	To store data about an asylum application and all relevant dates and developments within the procedure.	/	/

⁴ Please differentiate between access to database and access to data. 'Access to database' is understood as a national authority being authorised to have direct access to a database without the need to request data to be transmitted to them via other authorities or intermediaries. 'Access to data' is reserved to cases where an authority has access to data contained to a database, through transmission or sharing by another authority.

		able to view available data but can only enter data that fall within their competence.				
(Database 4)	Central Police Database (National Police Database related to all fields of work)	The Police	Registering an application	Transfer of the applicant to the competent authority	/	/

Section 2: Making an asylum application

This section requests information on asylum seekers making an asylum application to an authority that is not competent to register an asylum application.

'Making an application': *The expression of intent to apply for international protection.*

2.1 Making an application to an authority not competent to register the asylum application

If your (Member) State does not differentiate between "making an application" and "registering an application", or if these two phases are conducted concurrently, as referred to in Section 1.1, please skip and go to Section 3.

10. What information do authorities who are not competent to register an asylum application provide to the asylum applicants on where to go and what to do?

They inform the police who come to take the asylum applicant to a police station and proceed with the preliminary procedure (including registration).

11. Do the authorities who are not competent to register any asylum application collect any data on the asylum applicant?

Yes / No

If yes, please specify which type of data is collected.

If yes, is this data further transferred to the competent authorities?

Section 3: Registering an asylum application

'Registering an asylum application': *Record the applicant's intention to seek protection.*

This section requests information on the registration of asylum applications.

If the process of registering and lodging of the asylum application are conducted concurrently (according to the law or in practice) in your (Member) State, please make this clear in Section 1 and proceed by skipping this Section and going directly to Section 4. If however, registering and lodging of an asylum application are conducted separately in your (Member) State (e.g. in crisis times or regionally with regard to islands vs. main land, cities vs. rural areas, centralised vs decentralised) please proceed by answering the following questions in Sections 3 and 4.

If the process of registering, lodging and examination of the asylum application are conducted concurrently (according to the law or in practice) in your (Member) State, please make this clear in Section 1 and proceed by skipping this Section and going directly to Section 5.

*For Member States implementing **the hotspot approach**, please highlight whether there are differences in the processes applied in hotspots with regard to the standard/general asylum procedure.*

3.1 Cross checking of data collected at the registration phase

12. Against which databases at i. local/regional, ii. national, iii. European and iv. international levels is the information collected during registration cross-checked⁵ (please elaborate, what the purpose is of the cross-checking and if only specific categories of data are cross-checked)?

Data is cross-checked against the national/central Police database, against SIS and SLTD/INTERPOL database. It is also passively checked against EURODAC.

13. Does systematic cross-checking against (i) VIS and (ii) SIS take place?

Yes / No **Only against SIS.**

14. What issues has your (Member) State encountered in cross-checking data collected at registration phase? **None.**

For each issue mentioned, please describe a) for whom it is an issue, b) why it is considered an issue and c) whether the assessment that this issue based on input from experts (please indicate sources)

3.2 Information provided to asylum applicants in the registration phase

15. Are asylum applicants provided with a processing/privacy notice⁶ about the personal data collected from them during the registration phase?

Yes / No

If yes, please describe which information is provided (i.e. the purpose for which personal data from the asylum applicant is collected and on what basis, who has access to the information, data protection rights etc).

16. a) Who provides the information mentioned above (under Q15) (public authorities, international organisations, CSO - civil society organisations)?

b) How is this information provided (orally, digitally, in writing or all three)?

Please describe.

c) Where information is provided orally, is interpretation available?

Yes / No

d) Where information is provided digitally, is translation available?

Yes / No

If yes, who provides the digital information (e.g. national authorities, NGOs etc)?

e) Where information is provided in writing is translation available?

Yes / No

If yes, who provides the translation service (e.g. national authorities, NGOs etc)?

⁵ Purpose of cross-checking: Previous asylum applications, Prior legal residence/stay, Illegal border crossing, Illegal stay (overstay), Criminal record, Security risks, Detect counterfeit identity/travel documents, Other (please specify).

⁶ The obligation to take appropriate measures to provide data subjects with a processing or privacy notice stems from Article 12 GDPR which obliges data controllers to provide "any information referred to in Articles 13 and 14 and any communication under Articles 15 to 22 and 34 relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language." The information referred to in Articles 13 sets out the information to be provided where data has been collected from the data subject. It includes setting out the purpose of the data collected and legal basis; legitimate interests of the data controller (where this is used as the legal base); recipients of the data or categories of data; and if the data will be transferred to a third country or international organisation. Articles 15 to 22 refer to the data subject's rights including the rights to access, rectification and erasure; the right to object (if data is being collected for certain purposes including for a task carried out in the public interest or an official function vested in the data controller or in pursuit of legitimate interests of the data controller); right to data portability etc.

17. Is any specific training or guidance (i.e. guidelines) provided for staff responsible for data management with regard to information collected at the registration phase?

Yes.

3.3 Where self-registration procedures apply, (Member) States are asked to elaborate more on the framework and experiences.

18. Does your (Member) State have any self-registration procedures in place?

Yes / No

If yes, please answer questions 19-23.

If not, please move to section 4.

19. When was the self-registration procedure introduced and why?
20. Where do asylum seekers self-register (e.g. website, by phone)?
21. Are asylum seekers provided with any guidance/assistance/information on how to self-register?
If yes, please elaborate and indicate who provides this information
22. In which languages is the self-registration procedure available?
23. Is self-registration mandatory or optional?

Please elaborate.

Section 4: Lodging an asylum application

This section requests information on asylum applicants lodging an asylum application.

4.1 Cross checking of data collected at the lodging phase

24. Against which databases at i. local/regional, ii. national, iii. European and iv. international levels is the information collected during the lodging phase cross-checked (please elaborate, what the purpose is of the cross-checking and if only specific categories of data are cross-checked)?

We cross-check against data taken by the Police at the registering phase. We check all personal data, but we use data given at the lodging phase. The data we get at the lodging phase is also compared with the data we get in the case of EURODAC hit.

25. Does systematic cross-checking against (a) VIS and (b) SIS take place?

Yes / No

26. What issues have you encountered in cross checking data collected at the lodging phase? **Quite frequently, applicants change their data during the lodging of an application (compared to registration data). Usually applicants also do not provide relevant documents, so we have to consider what they say as the truth.**

For each issue mentioned, please describe a) for whom it is an issue, b) why it is considered an issue and c) whether the assessment that this issue based on input from experts - please indicate sources)

4.2 Information provided to asylum applicants at the lodging phase

28. Are asylum applicants provided with a processing/privacy notice⁷ about the personal data collected from them during the lodging phase?

⁷ The obligation to take appropriate measures to provide data subjects with a processing or privacy notice stems from Article 12 GDPR which obliges data controllers to provide "any information referred to in Articles 13 and 14 and any communication under Articles 15 to 22 and 34 relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language." The information referred to in Articles 13 sets out the information to be provided where data has been collected from the data subject. It includes setting out the purpose of the data collected and legal basis; legitimate interests of the data controller (where this is used as the legal base); recipients of the data or categories of data; and if the data will be transferred to a third country or

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Yes / No

If yes, please describe which information is provided (i.e. the purpose for which personal data from the asylum applicant is collected and on what basis, who has access to the information, data protection rights etc).

29. a) Who provides the information mentioned above (under Q 28) (public authorities, international organisations, CSO - civil society organisations)?

b) How is this information provided (orally, digitally, in writing or all three)?

Please describe.

c) Where information is provided orally, is interpretation available?

Yes / No

If yes, who provides the interpretation services (e.g. national authorities, NGOs etc)?

d) Where information is provided digitally, is translation available?

Yes / No

If yes, who provides the digital information (e.g. national authorities, NGOs etc)?

e) Where information is provided in writing is translation available?

Yes / No

If yes, who provides the translation service (e.g. national authorities, NGOs etc)?

30. Is any specific training or guidance provided for staff responsible for data management with regard to information collected at the lodging phase?

No.

Section 5: Examining an asylum application

The following sections request information on any additional data collected after an asylum application is deemed to have been lodged and before a first instance decision is issued.

5.1 Cross checking of data collected at the examination phase

31. Against which databases at i. local/regional, ii. national, iii. European and iv. international levels is the information collected during the examination phase cross-checked (please elaborate, what the purpose is of the cross-checking and if only specific categories of data are cross-checked)?

Collected information is cross-checked against information available on different portals/public databases in order to assure objectivity and neutrality of the information. Such sources include ecoi.net, EASO, refworld.com, roteskreuz.at/migration-suchdienst/accord/, etc.

32. Does systematic cross-checking against (a) VIS and (b) SIS take place?

Yes / No

33. What issues has your (Member) State encountered in cross checking data collected at the examination phase?

For each issue mentioned, please describe a) for whom it is an issue, b) why it is considered an issue and c) whether the assessment that this issue based on input from experts (please indicate sources).

international organisation. Articles 15 to 22 refer to the data subject's rights including the rights to access, rectification and erasure; the right to object (if data is being collected for certain purposes including for a task carried out in the public interest or an official function vested in the data controller or in pursuit of legitimate interests of the data controller); right to data portability etc.

Sometimes, a lack of specific information can be a problem for a decision maker, who needs such information for assessing an application. Also, information is sometimes available only in the national language of a source (e.g. the Norwegian Landinfo) – this presents a problem for a decision maker to assess and determine the relevance of information before asking for translation. Another problem might occur when different sources provide contradictory information.

5.2 Information provided to asylum applicants at the examination phase

34. Are asylum applicants provided with a processing/privacy note⁸ about the personal data collected from them during the examination phase?

Yes / No

35. If yes, please describe which information is provided (i.e. the purpose for which personal data from the asylum applicant is collected and on what basis, who has access to the information, data protection rights etc). a) Who provides the information mentioned above (under Q 34) (public authorities, international organisations, CSO - civil society organisations)?

b) How is this information provided (orally, digitally, in writing or all three)?

Please describe.

c) Where information is provided orally, is interpretation available?

Yes / No

If yes, who provides the interpretation services (e.g. national authorities, NGOs etc)?

d) Where information is provided digitally, is translation available?

Yes / No

If yes, who provides the digital information (e.g. national authorities, NGOs etc)?

e) Where information is provided in writing is translation available?

Yes / No

If yes, who provides the translation service (e.g. national authorities, NGOs etc)?

36. Is any specific training or guidance provided for staff responsible for data management with regard to information collected at the examination phase?

No.

Section 6: Data quality and safeguards [max 4 pages]

The following sections request information on how data quality is managed and the safeguards that (Member) States apply.

6.1 Data quality management

37. Is the quality of (at least some categories of) data (alphanumeric and biometric) collected during the asylum procedure assessed (e.g. with regard to accuracy, timeliness, completeness, consistency, duplication and validity of the data)?

Yes / No

⁸ The obligation to take appropriate measures to provide data subjects with a processing or privacy notice stems from Article 12 GDPR which obliges data controllers to provide “any information referred to in Articles 13 and 14 and any communication under Articles 15 to 22 and 34 relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language.” The information referred to in Articles 13 sets out the information to be provided where data has been collected from the data subject. It includes setting out the purpose of the data collected and legal basis; legitimate interests of the data controller (where this is used as the legal base); recipients of the data or categories of data; and if the data will be transferred to a third country or international organisation. Articles 15 to 22 refer to the data subject’s rights including the rights to access, rectification and erasure; the right to object (if data is being collected for certain purposes including for a task carried out in the public interest or an official function vested in the data controller or in pursuit of legitimate interests of the data controller); right to data portability etc.

If yes, please elaborate on some contrasting⁹ examples of data quality assessment and indicate:

a) In which phase(s) of the asylum procedure is the quality of data assessed (quality assessment)?
In the registration phase.

b) How (specific tools)¹⁰ and by whom (centralised/decentralised) is the quality assessment carried out? **In a special software application for registration – with software checks, validation rules and similar. It is centralised.**

c) If decentralised, how is it ensured that the other actors get to know about data amendments and changes? **N/A**

38. Do quality assessment measures only apply retroactively? **They apply proactively and retroactively.**

39. Are any preventative measures in place to get the information right at the very beginning? **Yes/No. If yes, which safeguards are in place? See above.**

6.2 Safeguards

40. Describe the supervision mechanism for data protection supervision of the personal data collected during the asylum procedure in your Member State.¹¹

The Police apply internal audit in terms of data and personal data protection. The database itself has its own features of data protection, keeping logs of the data use and access, prevention against unauthorised data use and access, and logs regarding the reason for use and access. The data protection authority conducts regular audits in this regard.

The IPPD provides limited access to databases to case officers/decision makers with passwords. The Asylum Register database additionally requests purpose of entry from the user. Moreover, all officials are authorised from the minister for conducting the asylum procedure and decision making.

41. Have (national) data protection authorities or similar entities assessed any of the databases described above?

Yes / No

If yes, please specify the relevant authorities, briefly describe what conclusions have they drawn, including whether such conclusions have led to changes in data management. *Please indicate sources and whether there are any published reports or audits available on these inspections.* **In terms of making and registering of the asylum information, no issues were detected. For more information see the annual reports of the Slovenian Information Commissioner, available at <https://www.ip-rs.si/en/publications/annual-reports/>.**

The Information Commissioner is currently conducting an inspection procedure regarding the processing of applicants' accommodation data (their daily presence in the existing accommodation capacities and the recording of absences). We have not yet received a final notice, but it is clear from the written correspondence so far that the Information Commissioner believes that there is no legal basis for collecting such data.

As an amendment to the International Protection Act is currently being prepared, the findings of the Information Commissioner will be duly taken into account, so that the law will clearly show the legal basis for collecting such information, which is important for the Ministry of the Interior, especially to stop proceedings after applicants abscond.

⁹ It will not be feasible to elaborate on all data quality assessment measures for each type of data collected which is why we are asking for contrasting examples where different types of quality assessment measure (e.g. tools, technical equipment, data analytics etc.) apply.

¹⁰ E.g. name transliteration, screening for duplicates against data already stored in the database, automated data quality checks, data analytics, artificial intelligence.

¹¹ The question does not refer to the legal framework but to how a data protection authority in a Member State supervises the implementation of that legal framework (what are the structures in place in your Member State to ensure the data subject's data protection rights are being ensured).

42. How is it arranged in practice the manner in which the rights of asylum applicants in relation to access, rectification and erasure of their data stored in the national systems are exercised?
According to legal provision, the person has access to this data and the data can be corrected.

Please provide available statistics concerning the number of requests made by asylum applicants, if any. No statistical data is collected in this regard.

Section 7: Responding to challenges in data management: recent reforms to the asylum procedure

7.1 Challenges and changes/reforms in data management

43. Has your (Member) State experienced any of the following challenges related to data management in the past years (since 2014)?

Please elaborate **on each of the selected challenges**, mentioning: a) for whom it is a challenge (policy-maker, organisation, other stakeholders); b) why it is considered a challenge; and c) how was it identified as a challenge (e.g. surveys, evaluation reports, focus groups, experts opinions etc).

- Lack of human or financial resources **Registration of a large number of migrants presents a burden for the Police human and technical resources. It is a challenge for the organization, and it was recognised with expert opinions.**
- Self-registration **Slovenia does not have a self-registration option but would like to introduce it as a possibility. However, technical obstacles exist to adapting the existing database.**
- Legal obstacles **They present a challenge that is dealt with regularly and it depends on political will to allow specific changes and adaptations.**
- Cooperation between national authorities
- Interoperability of databases **Because of the complexity of database connectivity and because all EU countries are involved in development.**
- Technical limitations in data processing **Because of technical adaptations of demands for more space for data storage.**
- Implementation of Eurodac and/or GDPR regulation
- Lack of training/information
- Transliteration (e.g. Arabic to Latin or other alphabets) **A big issue is a lack of translators/interpreters and tools (technical solutions) for transliteration and translation. It is a challenge for the organization, and it was recognised with expert opinions.**
- Other (please specify):

44. Did your (Member) State introduce any major change(s)/reform(s) related to data management in the past years (since 2014)?

Yes / No

If yes, please describe those changes and why they were made.

After 2014, the system was updated and adapted according to identified needs. We faced big changes in the 2015 influx and since then the system has been upgraded, i.e. adapted to a higher number of data entry, being more thorough, and giving more detailed review of the procedure from the beginning till the end.

If not, please move to Q48.

45. Have any of the abovementioned changes become standard operating procedure in your (Member) State?

Yes / No

Please elaborate **The changes that resulted from the needs identified after the influx have become standard.**

46. Were any of these changes/reforms related to data management introduced due to the introduction of 'channelling'?

Yes / No

If yes, please elaborate.

47. Did the reforms introduced achieve the intended results? Why?

Please elaborate and explain why the reform(s) achieved/did not achieve the intended results.

Yes. (See answer to question 44.)

48. Would your (Member) State consider this reform(s) as a good practice? **Yes.**

Please elaborate and explain why your (Member) State considers/ does not consider the reform(s) a good practice. In particular, please mention whether any of those reform(s) are believed to have improved the quality of the asylum procedure. **Even though we do not quite consider them reforms, the changes have made the work easier for asylum officials. An IT solution was developed from a practical situation.**

49. Have any on-going (unaddressed) challenges related to data management in the asylum procedure been identified in your (Member) State? **An interoperable solution between the police and asylum database (and also other stakeholders, provided that appropriate protection of personal data is ensured) would present a welcome solution to a faster and easier traceability of data.**

If yes, please elaborate.

If yes, is your (Member) State taking any steps to address these challenges? **Discussions and developments are in process.**

7.2 Contingency measures

50. Are there any contingency measures in place to accelerate and/or ease the process in times of high influx of asylum seekers with regard to data management?

If yes, please describe those measures.

A contingency plan was adopted in 2016 and is in use when we are faced with high influx. Contingency measures include standard measures, for example new employments on fixed-time contracts. It is planned to be updated in the near future.

Section 8: Conclusions [max 2 pages]

This section of the Synthesis Report will draw conclusions as to the (Member) States' existing policies, practices and case law related to the registration and data management in the asylum procedure.

With regard to the aims of this study, what conclusions would you draw from your findings reached in elaborating your national contribution? In particular, what is the relevance of your findings to (national and/or EU level) policymakers?

No bigger issues/challenges have been identified regarding data management in the asylum procedure in Slovenia. The relevant authorities cooperate well. Protection of personal data is believed to be well-provided for. Regular audits, either internal or by the national protection authority, make sure that data is protected appropriately and that improvements are made where necessary.

There have not been any major changes related to data management in recent years. Most advancements that were made were small and were based on the recognition of difficulties in practice. When a problem is identified, officials search for an appropriate solution. Prompt adjustments, fast reactions and political will then contribute to a solution and a better-functioning system. Implementation on the technical level seems to present the biggest challenge in this regard.

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Among the proposed solutions is interoperability or automated access to collected data about an asylum applicant between the Police, the Ministry of the Interior and other involved stakeholders. This would enable faster and easier traceability of data for all involved sides. Such improvements would most likely contribute to a faster and more efficient asylum system, and better management of statistics in this field.

Annex 1 National statistics

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Please fill in the attached excel sheet with the respective statistics for your (Member) State – provided in a separate Excel file. The Statistical Annex consists of the following:

Annex 1.1. Number of registrations of asylum applications

Annex 1.2. Number of lodged asylum applications



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