



**Greek National Commission for Human Rights (GNCHR)**

**Response to the OHCHR Questionnaire under Human Rights Council  
Resolution 55/8 on Disability-Inclusive Infrastructure:  
Accessible Transport and Housing**

**September 2025**



*The Greek National Commission for Human Rights (GNCHR) is the independent advisory body to the Greek State on matters pertaining to human rights protection and the National Human Rights Institution (NHRI). It was established in accordance with the UN Paris Principles and is governed by Law 4780/2021. Its members are persons appointed by forty-two institutions whose activities cover the field of human rights (independent Authorities, universities, third level trade unions, NGOs, political parties and the Administration).*

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## **Response to the OHCHR Questionnaire under Human Rights Council Resolution 55/8 on Disability-Inclusive Infrastructure: Accessible Transport and Housing**

### **1. Introductory Observations**

The Greek National Commission for Human Rights (GNCHR), the independent advisory body of the Hellenic State on issues relating to the protection of human rights, has among its statutory responsibilities the continuous indication to all State organs of the need for the effective safeguarding of human rights, the constant monitoring of developments related to the status of rights in Greece and abroad, the provision of information to the public regarding the risks of violations, and, above all, the provision of advice to the Greek State for the formulation of sound central policy on matters pertaining to human rights. The GNCHR has a pluralistic composition with 19 members nominated by NGOs, trade unions, independent authorities, universities, bar associations, while political parties, Parliament and the administration participate as liaison members. Notably, among its members is also a representative of the National Confederation of Disabled Persons (ΕΣΑΜΕΑ), with full voting rights in the Plenary of the Commission.

In its previous positions regarding the rights of persons with disabilities, which will be briefly presented, the GNCHR's arguments have shown a consistent line: Greece has ratified the CRPD but has not implemented it effectively. Problems include fragmented and inconsistent policies, weak enforcement of accessibility, inadequate protection in education and social protection, the devastating impact of austerity, and the neglect of refugees and migrants with disabilities. The GNCHR has repeatedly called for a coherent, reliable, and fully funded legal and policy framework, institutional strengthening, meaningful participation of persons with disabilities, and systematic data collection. Without these reforms, the rights of persons with disabilities in Greece remain inadequately protected.

The GNCHR welcomes the opportunity to contribute to the OHCHR's thematic study. Despite the above-mentioned problems and obstacles, Greece has made progress in establishing legal frameworks and dedicated institutions, but persistent challenges remain, especially concerning fragmentation of legislation, insufficient enforcement, and the lack of reliable disaggregated data. Without addressing these structural gaps, accessibility in housing and transport cannot be fully guaranteed. In preparing this questionnaire, the GNCHR also drew on input from the Greek National Confederation of Disabled People (NCDP).

## **2. GNCHR positions on the Rights of Persons with Disabilities in Greece (background information for Questions 1-3)**

### **2.1. *International Convention on the Rights of Persons with Disabilities: Problems regarding its implementation (2014)***

In its early analysis of Greece's ratification of the CRPD, the GNCHR welcomed the step but emphasized that ratification alone was not sufficient. It considered the adoption of Law 4074/2012 an important development for the protection of fundamental rights in Greece, but stressed that the law "constitutes inadequate compliance with the obligations undertaken by the Greek State upon ratification of the Convention, since it enables the Prime Minister to only implement Article 33(1) of the Convention and not the remaining paragraphs thereof".

The GNCHR drew attention to the structural gaps in Greek compliance with Article 33 CRPD, which requires States Parties not only to designate focal points and coordination mechanisms, but also to establish "one or more independent mechanisms...to promote, protect and monitor implementation of the present Convention". In Greece, Prime Minister's Decision No. 426/20.02.2014 designated the Ministry of Labour, Social Security and Welfare as focal point and coordination mechanism. However, as the GNCHR noted, "independent mechanisms, which shall promote, protect and monitor the implementation of the Convention, have not been established, as required by Article 33(2) of the Convention." This omission, the Commission underlined, "constitutes a serious violation of the Convention since it considerably reduces its effectiveness".

The GNCHR also emphasized that accessibility remained a major obstacle. Referring to Articles 9 and 30(1) CRPD, it stressed that persons with disabilities are guaranteed the right of access, on an equal basis with others, to public or private facilities and services open to the public. Yet "in Greece, many if not most of the facilities and services in question, including Court premises, are very difficult or impossible to access for persons protected by the Convention". Equally important was the question of participation. The GNCHR pointed out that the mere reproduction of Article 33(3) CRPD in the Prime Minister's Decision was "pointless," since it did not empower authorities to adopt concrete measures enabling civil society—"in particular persons with disabilities and their representative organizations"—to be actively involved in and fully participate in the monitoring process of the Convention.

### **2.2. *Written Submission to the Human Rights Council – Article 11 CRPD on Situations of Risk and Humanitarian Emergencies (2016)***

By 2016, the GNCHR had turned its attention to the combined effects of austerity and the refugee crisis. It recalled that since 2010 it had “consistently and constantly expressed its concern regarding the severe impact on human rights by the prolonged implementation of austerity measures of permanent character, which may eventually evolve to a situation of a humanitarian emergency that leads to the degradation of the protection of the rights of persons with disabilities”.<sup>1</sup> In addition, the GNCHR highlighted the refugee and migration crisis, noting that under the unprecedented refugee emergency and record arrival numbers, “the already insufficient structures in the Greek territory cannot provide persons with disabilities the care to which they are entitled and it is often civil society organizations which assist towards this direction”.<sup>2</sup> The GNCHR further warned that the implementation of the asylum and reception framework, although containing protective provisions, “remains in practice a big challenge” because “crucial structures such as the First Reception Service and the new Asylum System are of great need of human, economic and material resources”.<sup>3</sup> Against this background, the GNCHR stressed that “the identification of migrants, refugees and asylum seekers with disabilities is per se considered to be a major problem.” It reiterated that the Greek State must take “all necessary measures to identify migrants, refugees and asylum seekers with disabilities, an indispensable prerequisite for their subsequent protection as required by the CRPD”.<sup>4</sup>

### **2.3. Contribution by the GNCHR to the Committee on the Rights of Persons with Disabilities (CRPD) of the United Nations – Pre-Session Submission (2019)**

In its March 2019 contribution to the CRPD Committee, the GNCHR reaffirmed that safeguarding the rights of persons with disabilities has always been among the GNCHR priorities, and it endorsed the conclusions of the National Confederation of Disabled People’s Alternative Report. The GNCHR emphasized the situation of children with disabilities (Article 7), stressing that austerity-driven measures have led to a sharp decline in social rights, such as the right to health and social security of children with disabilities and special needs.<sup>5</sup> It called for a national strategy with specific axes relating to childhood protection and a child-focused fiscal policy. On situations

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<sup>1</sup> GNCHR *Written Submission to the Human Rights Council – Article 11 CRPD on Situations of Risk and Humanitarian Emergencies* (2016), p. 2.

<sup>2</sup> *Id.* p. 5.

<sup>3</sup> *Id.* p. 4.

<sup>4</sup> *Id.*

<sup>5</sup> GNCHR *Contribution to the Committee on the Rights of Persons with Disabilities (CRPD) of the United Nations – Pre-Session Submission* (2019), p. 4.

of risk (Article 11), the GNCHR reiterated its concern: “the continuous refugee and migration crisis and its impact on the most vulnerable group, namely refugees and migrants with disabilities,” revealed that existing structures were unable to meet needs.<sup>6</sup>

Education (Article 24) was another key focus. The GNCHR pointed out “the chronic problems observed in the education of children with disabilities, such as the recruitment of substitute teachers rather than permanent educational specialized personnel, the significant delay of the school year and the lack of parallel support personnel, as well as the effective access of persons with special educational needs to inclusive education”.<sup>7</sup> It noted the “absence of a clear legal framework” and the “legal uncertainty” caused by reliance on secondary legislation that was never issued, which undermined the right to education.<sup>8</sup> Finally, on monitoring (Article 33), the GNCHR observed that organizations representing children with disabilities were not involved in the national mechanism for monitoring the Action Plan on the Rights of the Child, thus failing to meet the requirements of Articles 4(3) and 7(1) CRPD.<sup>9</sup> It recommended amending national legislation to guarantee active participation of these organizations.

#### 2.4. GNCHR Shadow Report to the CRPD Committee (2019)

In its 2019 Shadow Report, the GNCHR provided an extensive evaluation of the implementation of the CRPD in Greece. It noted in general terms that “although the State designs policies and practices and takes specific measures in most sociopolitical areas... yet, these measures, albeit extended, form a rather fragmented social policy.”<sup>10</sup> The Commission expressed “serious concerns regarding the lack of continuity and coherence in the context of the services provided” and recommended strengthening and upgrading existing structures rather than establishing new, temporary ones.<sup>11</sup>

*Equality and non-discrimination (Article 5).* The GNCHR observed that the national anti-discrimination framework continued to leave space for discrimination. In particular, the notion of “reasonable accommodation” was narrowly confined to the fields of employment and vocational training, while the Convention requires its horizontal application across all policy areas.<sup>12</sup>

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<sup>6</sup> *Id.* p. 5.

<sup>7</sup> *Id.* p. 7.

<sup>8</sup> *Id.*

<sup>9</sup> *Id.* p. 8.

<sup>10</sup> GNCHR *Shadow Report to the CRPD Committee* (2019), p. 3.

<sup>11</sup> *Id.*

<sup>12</sup> *Id.* p. 8-10.

*Women and children with disabilities (Articles 6–7).* The GNCHR welcomed the inclusion of disability dimensions in the National Action Plan on Gender Equality 2016–2020 but warned that the economic crisis had increased exposure to multiple discrimination, with women with disabilities remaining particularly vulnerable.<sup>13</sup> Regarding children, it criticized the lack of concrete legal and institutional measures to guarantee reasonable accommodation in the framework of the National Action Plan for the Rights of the Child, emphasizing the need for mechanisms that empower the participation of children with disabilities in decision-making.<sup>14</sup>

*Accessibility (Article 9).* Although Greek law provides for accessibility of public buildings and infrastructure and some positive steps have been taken, the GNCHR notes persistent obstacles.<sup>15</sup> Many public service buildings remain inaccessible, particularly for persons with mobility and visual impairments. Law 4067/2012 required all existing buildings open to the public to be adapted by the end of 2020, but this deadline was expected to be extended. Law 4495/2017 introduced Building Environment Observatories and a Central Accessibility Committee (including a representative of the National Confederation of Disabled People, NCDP), but the GNCHR expressed concern since around 60 implementing decrees and decisions were still pending. Schools and many public and private facilities remained difficult or impossible to access, and there was no comprehensive National Accessibility Plan. On transport, the GNCHR shared the NCDP's concerns over regional disparities: while Athens and Thessaloniki have made progress, long-distance buses, local buses, and trains remain largely inaccessible. The GNCHR recommended that authorities adopt measures to guarantee access on an equal basis in the physical and digital environment, transport, and public services, both in urban and rural areas. It endorsed the NCDP's proposal for a National Accessibility Plan involving all stakeholders, awareness-raising, and unified standards. It also urged improvements throughout the transport cycle nationwide and supported recommendations for staff training in public transport and proportional sanctions for non-compliance.

*Independent living (Article 19).* The GNCHR highlighted that independent living was obstructed by inaccessible housing, lack of personal assistance schemes, and fragmented, EU-funded rather than state-funded social services. It called for the integration of existing services into

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<sup>13</sup> *Id.* p. 11.

<sup>14</sup> *Id.* p. 13.

<sup>15</sup> *Id.* p. 14-17.



a public, free-of-charge health and welfare system secured by the national budget, warning that reliance on EU funding endangered the stability of essential support structures.<sup>16</sup>

*Adequate standard of living and social protection (Article 28).* The GNCHR noted that disability allowances were insufficient and did not guarantee an adequate standard of living, especially under conditions of prolonged austerity.<sup>17</sup>

*Statistics and monitoring (Articles 31 and 33).* Finally, The GNCHR expressed particular concern that the Hellenic Statistical Authority, despite being responsible for the collection and dissemination of official statistical data, “does not collect on a regular basis data with special reference to people with disabilities.”<sup>18</sup> It highlighted the absence of a unified data-collection system that would allow an assessment of the extent to which persons with disabilities are exercising their human rights. Although Law 4488/2017 (art. 68) requires the Hellenic Statistical Authority and other agencies of the Greek Statistical System to produce official statistics on the barriers faced by persons with disabilities, these obligations have not been fully met. The GNCHR noted that until recently only limited data were available, drawn mainly from health and employment surveys. In light of these shortcomings, the GNCHR recommended strengthening the capacity of the Hellenic Statistical Authority, in cooperation with the Disability Observatory of the NCDP, to develop comprehensive national disability statistics under a rights-based approach. With regard to Article 33 CRPD, the GNCHR underlined the importance of effective monitoring of the Convention and reiterated that representative organizations of persons with disabilities must be closely consulted and actively involved in the monitoring process, in line with paragraphs 2 and 3 of Article 33.<sup>19</sup>

### **3. The National Accessibility Authority and the Role of the GNCHR (background information for Questions 1-3)**

The National Accessibility Authority (*Εθνική Αρχή Προσβασιμότητας* – EAP) was established by Law 4780/2021 as a specialized advisory body of the Greek State, in which the GNCHR is a member. Its founding purpose is to safeguard the right of persons with disabilities to accessibility across all areas of human activity. The Authority’s mission combines continuous monitoring of accessibility-related issues with the formulation of proposals aimed at shaping public policy in this

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<sup>16</sup> *Id.* p. 28.

<sup>17</sup> *Id.* p. 39.

<sup>18</sup> *Id.* p. 41.

<sup>19</sup> *Id.* p. 42.

field. Institutionally, the Authority is placed under the Prime Minister, highlighting its political significance. It is supported in terms of staffing and infrastructure by the Presidency of the Government, and its activities are financed through a distinct and separate budget line. This framework seeks to ensure that the Authority operates with adequate visibility, resources, and independence in carrying out its mandate.

The competences of the EAP are wide-ranging. It monitors the application of international, European Union, and national law on accessibility, and it makes proposals for comprehensive policies, regulatory reforms, and concrete measures. It provides opinions on draft legislation and participates in consultations with public authorities, civil society, and the disability movement. A core task of the Authority is to propose and update accessibility standards in the built and digital environment, in communications, transport, products, and services, and to advise on their implementation.

The EAP also cooperates with the Coordinating Mechanism within the Government (Law 4488/2017), submitting proposals for the implementation and revision of the National Action Plan on the Rights of Persons with Disabilities. It participates in legislative drafting processes, ensuring that bills are compatible with the UNCRPD and its Optional Protocol (Law 4074/2012). Beyond legislative work, the Authority interacts with Regional and Central Accessibility Committees and can establish expert working groups drawn from the public and private sectors. It issues annual and interim reports, represents Greece in international and EU fora on accessibility matters, undertakes awareness-raising initiatives in cooperation with ministries, and provides technical assistance, training, and public events.

While the EAP's mandate is focused on accessibility, it is not intended to replace the broader human rights oversight provided by the GNCHR. The GNCHR, established under Law 2667/1998 in line with the Paris Principles and accredited with "A status," remains the independent advisory body to the State on *all* human rights matters. Crucially, the GNCHR participates in the EAP as a member, thereby ensuring that accessibility is treated not only as a technical issue but as a human rights obligation. Its presence within the Authority guarantees that human rights considerations, such as equality, participation, and non-discrimination, are integrated into the development of accessibility standards and public policies. The GNCHR's involvement also ensures continuity between government coordination, civil society participation, and independent monitoring. By contributing its longstanding experience on the shortcomings of Greek disability policy (such as

fragmentation of measures and inadequate data collection), the GNCHR strengthens the Authority's capacity to align its work with international human rights obligations.

#### **4. GNCHR Observations on Accessibility, Housing, Transport, and Related Issues under the UNCRPD and input by the NCDP**

##### **4.1. Legal and policy frameworks (Questions 1-3)**

Greece has developed a number of national frameworks in line with the UNCRPD (Law 4074/2012), including the National Action Plan on the Rights of Persons with Disabilities (ESD) and the National Strategy for the Rights of Persons with Disabilities 2024–2030. The National Accessibility Authority (EAP), of which the GNCHR is a member, plays a central role in monitoring and contributing to these frameworks. Recent legislative initiatives include draft laws on the use of public property for social housing, as well as the national programme "[Social Housing for the Most Vulnerable Groups](#)" by the Municipality of Athens. Both initiatives are of particular importance for the independent living of persons with disabilities, provided that accessibility standards and universal design principles are effectively implemented.

Regarding the legal and policy framework to promote **accessible transport**, in Greece, the EU Regulations on transport accessibility -such as Regulation 1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air, Regulation 1177/2010 concerning the rights of passengers when travelling by sea and inland waterway, Regulation 1371/2007 on rail passengers' rights and obligations, and Regulation 181/2011 concerning the rights of passengers in bus and coach transport- are legally in force.

Despite existing rights and EU regulations, these are not fully implemented in the country. Thus, trains and long-distance buses or intercity buses (KTEL) are largely inaccessible, and maritime transport faces serious gaps. For example, in June 2024 and July 2025, wheelchair users were forced to remain in a ferry garage on the Keramoti-Thassos route due to the lack of a ramp.<sup>20</sup> The National Confederation of Disabled People (NCDP) has called for revising the existing legislation (Presidential Decree 44/2011) that only requires accessibility on ships covering more than 30 nautical miles.<sup>21</sup> While the Ministry of Maritime Affairs and Insular Policy has announced

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<sup>20</sup> See for example, <https://www.in.gr/2024/06/24/greece/amea-xoris-rampa-gia-ta-atoma-anapiria-ploio-sto-dromologio-kavala-thassos/>, <https://www.tovima.gr/grace/apopseis/eisai-amea-timoria-sto-gkaraz-tou-ploiou/>

<sup>21</sup> For more, see: <https://www.esamea.gr/el/article/h-elleipsh-prosbasimothtas-stis-thalassies-metafores-katapata-kathimerina-ta-dikaiwmata-katoikwn-kai-episkeptwn-me-anaphria-kai-meiwmenh-kinhtikothta-twn-nhsiwn-mas>, <https://www.esamea.gr/en/article/aysthro-plaisio-amesh-symmorfwshtwn-ploiokthtwn-se-zhthmata>

its plans to amend the Presidential Decree, and NCDP has submitted its proposals, until today there is no progress.

In 2022, Greece transposed the EU Directive 2019/882 (European Accessibility Act) into its national legislation (Law 4994/2022), which requires various consumer products and services, including those in the transport sector, to be accessible. Although the Directive Obliges Member States to implement its provisions by the end of June 2025, to date, Greece has made no progress so far. According to the National Disability Strategy on the Rights of Persons with Disabilities, the implementation of Law 4994/2022 has been scheduled for late 2026.<sup>22</sup> There is currently no specific legal framework governing the provision and operation of accessible taxis.

In addition, a national legal framework provides various benefits for persons with disabilities, and in some cases, to their companions, to support their mobility when they travel by means of transportation. These include fare discounts on ships,<sup>23</sup> trains, intercity buses (KTEL),<sup>24</sup> and urban public transit, which depend on the severity of the disability (e.g., a certified degree of disability of 67% or above), as well as subsidies for special transportation cards.<sup>25</sup>

Regarding **housing**, there is currently no specific legislation addressing the needs of persons with disabilities. According to recent data from Eurostat, Greece ranks first in the EU in housing

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prosbasimothtas, <https://www.esamea.gr/index.php/el/article/synexizetai-h-talaipwria-twn-atomwn-me-anaphria-sta-ploia-kai-sta-limania-ths-xwras-kathysterhsh-enos-xronoy-sthn-ekdosh-pd>

<sup>22</sup> See action 69 of the National Strategy on the Rights of Persons with Disabilities.

<sup>23</sup> For the fare discounts on ships, see, Article 35, Law 4150/2013 “Reconstruction of the Ministry of Shipping and the Aegean and other provisions”. Government Gazette 102/A/29.04.2013, Ministerial Decision 3324.1/01/13/15.07.2013 (Government Gazette 1728/B/15.07.2013), “Determination of public services and obligations and high-speed passenger ferries.”

<sup>24</sup> Free transportation on urban public transport and a 50% discount on intercity KTEL buses and Hellenic Train are granted to persons with a certified disability of 67% or those receiving a disability allowance from OPEKA. In addition, free transportation is also provided for one companion if the person is blind or has a visual disability of 80% or above, has a IQ below 34, has an intellectual disability of 80% or above, or is a person with developmental disabilities (childhood autism, autism) with a disability rate of 80% or above. See also, Joint Ministerial Decision (JMD) No. 3571 (Government Gazette 1193/B/12-03-2025), (ADA: 9HBA46NL2A-NK6) “*Determination of the terms, conditions, and procedure for free or reduced-fare travel for (a) Persons with Disabilities (PWDs) and (b) large families and their members, for the year 2025, using the transport services of OASA, OSETH, and urban and intercity KTEL companies that are members of the federations P.O.A.S. and P.O.A.Y.S.*” and Circular 4628 / 01.04.2025 “*Clarification Circular on the issuance of Travel Passes for PWDs for the year 2025 by the Regional Units of the country.*”

<sup>25</sup> For free travel on urban public transport, the issuance of a personalized ATH.ENA.CARD is required. For the Region of Attica, see, <https://athenacard.gr/jsp/smartafc/general/customers/personalized-card.jsp>, for the Regional Unit of Thessaloniki see, <https://oseth.com.gr/el/thesscard-gia-leoforeia>. For the other Regional Units of the country, urban transport is provided by the local Urban KTEL services of the respective Regional Unit, with the issuance of a travel pass, which is issued by the Citizen Service Centers (KEP) and the competent services of the Regional Units upon submission of the required documentation.

cost burden for persons with disabilities, with 33% spending over 40% of their disposable income on housing. Therefore, persons with disabilities are also more likely to live in substandard housing and face poorer living conditions compared to the general population.

In July 2025, the Ministry of Social Cohesion and Family Affairs opened for public consultation the draft law “*Social Consideration, Social Leasing, Third Child-Status, and Other Provisions under the Competence of the Ministry of Social Cohesion and Family Affairs.*” NCDP welcomed the inclusion of *Short-Term Accommodation Structures for Persons with Disabilities*, a long-standing demand of the disability movement, which will provide temporary housing, care, and support services to enhance autonomy, promote social inclusion, support caregivers, and improve quality of life. Another positive step is the requirement that all social housing contracts guarantee compliance with accessibility standards in new, renovated, or repaired buildings. However, during the public consultation, NCDP stressed the urgent need for clear and distinct provisions on housing for persons with disabilities, with explicit references to disability across all related measures.<sup>26</sup> The draft law has not been finalized yet.

Regarding **building accessibility**, Article 26 of Law 4067/2012 (“New Building Regulation”), titled “Barrier-free accessibility for persons with disabilities and persons with reduced mobility”, established mandatory compliance with the Design Guidelines for both new and existing buildings, ensuring full accessibility. Although Article 26 (paras. 4 and 10) of Law 4067/2012 required existing large-scale buildings to become accessible by 2020, this obligation was repeatedly postponed by the Ministry of Environment and Energy. The last extension set April 30, 2024, as the final deadline.<sup>27</sup> As of May 1, 2024, the provisions are now in force.

**National Strategy on the rights of persons with disabilities 2024-2030.** Under Pillar I, ‘Universal Accessibility’ of the National Strategy, Objective I.2, Ensuring Accessibility of Transport Systems, include nine actions aimed at improving accessibility across all transport systems, and Objective I.1, “Unobstructed access to the natural and built environment,” includes one action that focuses on developing or enhancing accessible housing.

The EU Transport regulations (air, sea, rail, bus/coach) and the transposition of the European Accessibility Act (Law 4994/2022) reflect alignment with Article 9 (Accessibility) and Article 20 (Personal Mobility) of the CRPD, as they aim to ensure equal access to transportation and mobility

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<sup>26</sup> The ESAMEA’s comments/proposals to the draft law are available at <https://www.opengov.gr/koinsynoi/?p=9652>

<sup>27</sup> For more, see <https://www.elinyae.gr/ethniki-nomothesia/ya-ypendesedp338885422024-fek-2027b-142024>

services. However, gaps in their implementation, such as limited accessibility of trains and intercity buses (KTEL), restrict the actual enjoyment of these rights.

As mentioned, there is no specific legal framework that guarantees accessible housing. The draft law on Short-Term Accommodation Structures and accessibility in social housing contracts moves toward compliance with Articles 19 (Living independently and being included in the community) and 28 (Adequate standard of living and social protection). However, the gap still remains.

Article 26 of Law 4067/2012, mandates barrier-free access in new and existing buildings, consistent with Article 9 of the CRPD, yet weak enforcement limits practical impact.

#### **4.2. Accessible transport (Questions 4-7)**

In 2024, *EAP* issued opinions on maritime passenger accommodation (p.d. 44/2011 and 221/2001), public bus stops, and accessibility in national sports facilities. It has also stressed the need for codification of scattered (and often inconsistent) legal provisions on accessibility of the built environment and transport systems. While Greece has taken steps towards accessible urban transport (metro, buses, trams), gaps remain in regional, maritime and air transport, particularly regarding demand-responsive services such as paratransit and accessible taxis. Training of transport personnel is uneven, and monitoring mechanisms are not systematically applied across all modes of transport.

The **metro** (subway) is fully accessible to persons with disabilities, following the involvement of the disability movement during its construction. Boarding and alighting for wheelchair users is easier in the first or last carriage, as these carriages are equipped with ramps to bridge the gap between the platform and the train and have the appropriate signage.

On the **suburban railway** (Electric Railway), wheelchair users can board the train through the first door of the first carriage, where the relevant signage is displayed. At Agios Nikolaos, Omonia, and Monastiraki stations, due to the large gap between the platform and train, passengers must call station staff for assistance with a portable ramp. Signage on carriages and audio announcements provide relevant guidance.

Since 2024, STASY has made an application available to inform users with mobility impairments about the **accessibility of elevators** at stations on Line 1 (suburban railway) and Lines 2 and 3 (metro).<sup>28</sup>

Regarding the **accessibility of ships and ports**, while large ferry operators and main ports have introduced ramps, lifts, and adapted toilets, accessibility is still limited in smaller ports or older ferries. Independent travel for persons with disabilities may still be difficult due to uneven infrastructure and/or limited trained staff. The Ministry of Maritime Affairs and Insular Policy has launched a dedicated webpage,<sup>29</sup> where passengers with or without disabilities can find information on port and ship accessibility, as well as their rights as passengers.

Regarding **train accessibility** for wheelchair users, there is a limited number of accessible trains, which can accommodate only two wheelchair users per route. Additionally, if a train service is canceled and replaced by buses provided by the operator, the available buses are not accessible and therefore cannot serve wheelchair users. For deaf and hard-of-hearing passengers, the Hellenic Train, in collaboration with the National Foundation for the Deaf, provides telephone assistance through Relay service.<sup>30</sup>

Regarding **airport accessibility**, there is a significant gap between major airports, such as ‘Eleftherios Venizelos’ in Athens, ‘Makedonia’ in Thessaloniki, and ‘Nikolaos Kazantzakis’ in Heraklion, and regional or island airports, with the latter facing serious accessibility challenges.

As for **the accessibility of buses and trolleybuses**, **several of them** are equipped with accessibility systems for persons with disabilities, such as ramps or kneeling mechanisms, to facilitate boarding for both passengers with disabilities and other individuals with reduced mobility. However, poor or non-existent maintenance often renders them inoperative. Additionally, in some cases, bus and trolleybus drivers are not familiar with their use. Inside buses, there are several seats (around four) reserved for persons with reduced mobility, including the elderly, pregnant women, and parents with small children.

In Athens, despite efforts to improve the **accessibility of bus and trolleybus stops** through the installation of visual and audio announcements informing passengers of arrivals and

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<sup>28</sup> The application is available at: <https://www.stasy.gr/elevators/>

<sup>29</sup> The webpage is available at: <https://passengersynanp.yna.gov.gr/ports/>

<sup>30</sup> For more information, see: <https://www.hellenictrain.gr/metafora-atomon-ameaamk>

departures, this service is not available at all stops.<sup>31</sup> Similarly, these types of services are available in several bus stops in Thessaloniki.<sup>32</sup> However, while these services are partially available in cities like Athens and Thessaloniki, this does not mean that they are also available in other cities in the rest of the country.

In Athens, while buses and trolleybuses are equipped with **onboard screens** that provide visual information about the route, such as current and upcoming stops, this service is not always available. Additionally, in some cases, the displayed data may be misleading or inconsistent with the actual route. An **audio announcement system** is provided to inform all passengers, especially those who are blind or with visual impairments, about the upcoming bus stop. However, this system, like the visual system, does not always work correctly.<sup>33</sup>

Urban Road Transport (OSY S.A.) operates a dedicated service for persons with disabilities, offering free transportation to those who are unable to use conventional urban transport vehicles. The service has three specially equipped cars, each with 3 to 7 passenger seats, 3 to 4 wheelchair spaces, and one companion seat. This type of transportation is provided by appointment only, subject to vehicle availability, and covers all kinds of trips, including work, home, and leisure. The scheduling of appointments with this type of transportation can be done both by phone call and email. This service operates daily between 8:00 and 22:00, free of charge.<sup>34</sup> Similarly, in Thessaloniki, the Thessaloniki Urban Transport Organization (OASTH) serves a similar transport service for persons with disabilities, utilizing four specially adapted vehicles - three in regular service and one as a reserve. The service operates daily from 6:00 to 22:00 and on weekends and holidays from 7:00 to 23:00. The trips are also scheduled in advance via a telephone line. Group trips for social purposes are also arranged.<sup>35</sup>

As mentioned earlier, there is no legal framework regulating accessible taxis, resulting in a minimal number of such vehicles. This scarcity, however, creates significant barriers for persons with disabilities, often making taxi trips prohibitively expensive.

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<sup>31</sup> For more, see, <https://www.eoty.gr/athina-prosvasimes-156-staseis-leoforeion-pou-tha-topothetithoun-eidikes-proeksoches/>

<sup>32</sup> For more, see, <https://www.oasth.gr/a-mea/programma-dorean-exypiretisis-ton-a-mea/>

<sup>33</sup> For more, see:

<https://paratiritirioanapirias.gr/storage/app/uploads/public/669/645/05b/66964505ba74f412061873.pdf>

<sup>34</sup> For more, see: <https://www.osy.gr/χρήσιμες-πληροφορίες/υπηρεσίες-για-αμεα/>

<sup>35</sup> For more, see: <https://oasth.com.gr/el/ypiresies-exypiretisis-amea-apo-oasth>



**Training for transport personnel**, unfortunately, remains very limited and insufficient to ensure consistently accessible and dignified service to persons with disabilities. For example, although the Ministry of Maritime Affairs has issued a circular regarding the training of ferry personnel to assist passengers with disabilities properly, this provision has not yet been implemented. In fact, NCDP has highlighted this issue directly with the leadership of the Ministry of Maritime Affairs and Insular Policy, stressing the urgent need for its enforcement.

However, there are some examples of successful initiatives that address this gap. The Institute of the National Confederation of Disabled People (IN-ESAmA) was collaborated with Eleftherios Venizelos Airport, the ports of Rafina and Piraeus, and the Attica Group (Superfast Ferries, Blue Star Ferries, Hellenic Seaways, ANEK Lines) to provide comprehensive training for their staff on the rights of persons with disabilities. These programs involved theoretical and practical training and were implemented in accordance with international accessibility standards. The training addresses all types of disabilities — visual, mobility, hearing, intellectual, and mental health — and promotes an approach based on respect, support, and dignity.

According to the National Strategy on the Rights of Persons with Disabilities 2024-2030, **specific indicators** have been introduced to monitor the accessibility of transport systems. These include:

- Total number and percentage of accessible infrastructures, by category (e.g., ports, airports, facilities, stations) and of accessible public transport modes by type (buses/trolleybuses, metro/tram/train, passenger ships).
- Number of licensed taxis equipped with wheelchair ramps.
- Total number and percentage of transport sector employees trained and certified on disability awareness and accessibility issues, by operator.

At present, however, official data have not been published yet.

#### **4.3. Accessible and inclusive housing (Questions 8-10)**

Although **universal design** and reasonable accommodation are legally required, implementation remains fragmented. The ongoing housing initiatives referenced above integrate social considerations, but the lack of reliable disaggregated data on the availability of accessible housing limits their evaluation. The GNCHR stresses the urgent need for binding accessibility standards and monitoring in both public and private housing projects.

Regarding **improving housing accessibility** for persons with disabilities, at the end of July 2025, the Greek government launched the pilot program “Accessibility at Home”. The program aims to support 2,500 persons with disabilities -with mobility and sensory disabilities- (with a certified disability rate over 67% disability, legal residents of Greece, with income up to €60,000) by subsidizing accessibility interventions in their homes, workplaces, and shared building spaces.<sup>36</sup> The Recovery and Resilience Facility funds the program. The NCDP provided decisive support and actively participated in the preparation and implementation of this initiative.

Additionally, ‘Spiti mou II’ (My Home II), launched in January 2025, is a housing program providing favorable loans for the purchase of a first home to young people and families. Initially, it did not include special provisions for persons with disabilities. However, following intervention by the NCDP,<sup>37</sup> measures were introduced from July 1, 2025, for persons with a 67% or higher disability rate, such as extensions of the eligibility period for property construction and program eligibility, thereby improving participation and accessibility.

Universal design, house adjustments, and reasonable accommodation are recognized in Greece’s building regulations and housing policies. As noted, Article 26 of Law 4067/2012 mandates barrier-free accessibility in both new and existing buildings. Meanwhile, programs such as ‘Accessibility at Home’ and the updated ‘Spiti mou II (My home II)’ offer subsidies for housing modifications for persons with disabilities. However, enforcement remains limited, and there is no continuous rental financing mechanism, leaving gaps in ensuring fully accessible housing for all persons with disabilities.

It is essential to note **the absence of a continuous rental financing mechanism for supporting persons with disabilities** in accessing housing. In the context of independent living, a specific regulatory framework exists for the establishment and operation of Supported Living Residences (SLRs)<sup>38</sup> for adults with disabilities, which defines:

- the criteria for the operation of Supported Living Residences (SYD),

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<sup>36</sup> For more, see: <https://provasimotita.minscfa.gov.gr/> and <https://www.eetaa.gr/nea-anakoinoseis/anoixe-i-platforma-gia-to-programma-provasimotita-kat-oikon/>

<sup>37</sup> See, for example, <https://www.esamea.gr/en/article/diamartyries-gia-to-spiti-moy-2-apo-atoma-me-anaphria-xronies-hkai-spanies-pathhseis>

<sup>38</sup> The establishment and operation of Supported Living Residences (SYDs) mark a significant shift from institutionalization toward community-based living arrangements. These residences were intended for all persons with disabilities – physical, psychosocial, intellectual, and/or sensory impairments can live in Supported Living Residences.

- the conditions for beneficiaries, organizational structures, staff, infrastructure, and managing bodies,
- the technical specifications for facilities, including minimum floor space per resident, architectural requirements for accessibility, and appropriate equipment.

#### **4.4. *Participation and governance (Question 11)***

Both GNCHR and *EAP* ensure the institutionalised participation of persons with disabilities and their representative organisations. *EAP*'s role in the preparation of the National Strategy 2024–2030 is an example of good practice, as the consultation process was fully accessible (the only such process in Greece).

While important steps have been taken to strengthen the participation and governance of persons with disabilities, one pending issue remains. Although secure hybrid participation is already possible through the public videoconferencing platform [e:Presence.gov.gr](https://e-presence.gov.gr), the current legal framework does not fully guarantee the right to remote participation. The Greek General Confederation of Labour (GSEE) has therefore requested an amendment to Article 122(6) of Law 4808/2021, in order to recognize this right explicitly. Such a provision would ensure that workers living or employed in areas without a fully functioning Labour Inspectorate can still participate effectively through technological means.

The National Confederation of Disabled People (NCDP), a member of the GNCHR, is the umbrella organization representing the disability movement in Greece. NCDP, which is a non-profit legal entity, was founded in 1989 by organizations of persons with disabilities and their families to cope with issues of common interest related to any disability, thus becoming a strong, independent representative body for all persons with disabilities, persons with chronic illnesses, and their families in Greek society. It represents more than 500 organizations that address various disabilities at national, regional, and local levels. Since 1996, the Confederation has been officially recognized as the social partner of the Greek State dealing with disability issues, promoting policies that enable persons with disabilities to be socially, economically, and politically included in the country's everyday life.

Due to its institutional role as a Social Partner of the Greek state on disability issues, NCDP participates in various national and regional bodies that promote the rights of persons with disabilities and implement the UN CRPD. Thus, representatives of NCDP engage in committees, advisory boards, and working groups related to accessible transport and housing, including:

- the Central Accessibility Committee of the Ministry of Environment and Energy,
- the Regional Accessibility Committees (where they operate);
- the Monitoring Committees of the Sectorial Operational Programs of the NSRF 2021-2027, as well as in the Monitoring and Coordination Council of Development Interventions of the NSRF, with voting rights,
- Monitoring Committees of the Regional Operational Programs and the European Territorial Cooperation (INTERREG) Programs of the NSRF 2021-2027, with voting rights;
- the National Accessibility Authority (EAP),
- the National Commission on Human Rights (EEDA),
- the Advisory Body on issues of accessibility of persons with disabilities on coastal shipping vessels of the Ministry of Maritime and Insular Policy,
- the Coastal Shipping Council of Communications, the Ministry of Maritime and Insular Policy,
- the committee for studying and proposing the necessary measures to ensure universal access for persons with disabilities and reduced mobility to public transport at the Ministry of Infrastructure and Transport.
- Port Users Council, etc.

Also, NCDP has closely collaborated with the Coordination Mechanism and its team to develop both the National Action Plan for the Rights of Persons with Disabilities (2020-2023) and the National Strategy on the Rights of Persons with Disabilities (2024-2030). The NCDP also participated in the Technical Committee established by the Minister of State/Coordination Mechanism for the development of the Strategy.

#### **4.5. *Data collection and evaluation (Questions 12-13)***

The GNCHR and *EAP* consistently identify a serious structural problem: the absence of comprehensive, disaggregated, and publicly available data on accessibility in housing and transport. Data collection is fragmented across ministries and agencies, without a unified repository or consistent indicators. This undermines both policy evaluation and compliance with CRPD obligations. *EAP* has recommended the creation of a national database of accessibility indicators and good practices.

NCDP, a GNCHR member, has not been informed whether such data exist (on accessibility in transport and housing). However, data are collected when targeted actions for persons with disabilities are implemented. When no targeted actions exist for persons with disabilities, the data usually relate to general population surveys or broader service usage. They may not be disaggregated by disability type or other relevant factors.

#### **4.6. Good practices (Questions 14-15)**

- The digital consultation platform for the National Strategy 2024–2030 was made fully accessible (AAA level).
- Pilot programmes on early intervention and personal assistance are being implemented with *EAIT*'s participation.
- Local housing and social initiatives (e.g. Municipality of Athens housing projects) provide a model for integration of vulnerable groups, though systematic monitoring of accessibility remains necessary.

Another example of good practice is the collaboration between the Institute of the National Confederation of Disabled People (IN-ESAmEA), Eleftherios Venizelos Airport, the ports of Rafina and Piraeus<sup>39</sup>, and the Attica Group (Superfast Ferries, Blue Star Ferries, Hellenic Seaways, ANEK Lines)<sup>40</sup> to provide comprehensive training for their staff on the rights of persons with disabilities. These programs involved theoretical and practical training and were implemented in accordance with international accessibility standards. The training addresses all types of disabilities — visual, mobility, hearing, intellectual, and mental health — and promotes an approach based on respect, support, and dignity.

A key factor in implementing the practice mentioned above is that the training was delivered by persons with disabilities, who, through their lived experiences, were able to provide authentic insights and practical guidance. This approach not only increased the credibility and impact of the training but also fostered empathy, understanding, and awareness among staff. Lessons for replication or adaptation include the importance of involving persons with disabilities in the design and delivery of training, ensuring that programs are tailored to different types of disabilities, and promoting a culture of respect, dignity, and inclusive service within transport and housing providers.

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<sup>39</sup> For more, see: <https://www.in-esamea.gr/el/article/ekpaideysh-stelexwn-organismos-limenos-peiraiws-ae>

<sup>40</sup> For more, see: <https://www.in-esamea.gr/el/article/ekpaideysh-stelexwn-stolos-omilou-attica-group>

#### ***4.7. Integration with care and support systems (Question 16)***

Accessible housing and transport are directly linked to the implementation of the personal assistance pilot programme and to the broader framework of independent living and community inclusion. The GNCHR stresses that accessibility in these domains must be integrated into the long-term care and support systems, otherwise the effectiveness of independent living measures is undermined.