



Greek National Commission for Human Rights (GNCHR)

GNCHR Additional Information on the List of Themes for Greece's review of its combined 23rd and 24th periodic report by the Committee on the Elimination of Racial Discrimination (CERD) in its 114th Session

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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 twenty institutions (independent Authorities, third level trade unions, NGOs, universities and research institutions)

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1. We were pleased to note that the CERD Committee in its List of Themes in relation to the combined 23rd and 24th periodic reports of Greece published on September 30rd 2024 took into account the GNCHR Written Observations submitted to the Committee prior to the List of Themes. The GNCHR provided updated information and suggested relevant enquiries with respect to the antiracism legal framework, anti-discrimination legislation, racist hate speech and hate crimes, widespread use of hate speech, caselaw of criminal courts, rights of LGBTIQ+ persons, the rights of Roma, migrants, asylum seekers and refugees, gender equality, victims of trafficking in human beings, labor discrimination of migrant workers, right to security of person and protection by the State against violence or bodily harm, freedom of religion, situation of persons belonging to minorities, education and non-discrimination.

2. The CERD Committee in its List of Themes **requires from the State updated information and statistics** on (1) the demographic composition of the population, (2) complaints registered before the courts or any other national institution, including the National Commission for Human Rights, for acts of racial discrimination, racist hate speech and racist hate crimes, including over the Internet and through media outlets, and on the number of investigations, prosecutions and convictions of perpetrators (if any) and for acts of racial discrimination, racially motivated violence and racial profiling by law enforcement in specific, (3) inspection visits, detected violations, sanctions or penalties imposed and compensation provided to migrant workers, victims of labor exploitation and abuse and (4) stateless persons and those at risk of statelessness.

3. The GNCHR, within its monitoring and advising role, has previously called the State to enhance the capacity of the Hellenic Statistical Authority to develop national statistics from a human rights perspective. The Greek National Commission has expressed concerns over the general lack of disaggregated data needed for monitoring human rights progress and informed policymaking, stressing the importance of up-to-date and comprehensive statistics. This challenge also applies with respect to international monitoring by UN human rights bodies. UN treaty bodies, such as the CRPD¹, the CRC² and the CEDAW³ have recommended Greece to **develop a comprehensive data collection and reporting system in line with each Convention**. The Committee of Experts on the Application of Conventions and Recommendations of the International Labour Organisation has addressed direct requests to Greece on statistics and disaggregated data kept for the implementation of ILO Conventions No. 29 on Forced Labour and No. 111 on Discrimination (Employment and Occupation) and No. 160 on Labour Statistics binding upon Greece.⁴

4. The absence of a coordinated national data system hampers the collection of reliable statistics. The GNCHR has identified different factors that impact on the collection of segregated data and analysis. For instance, on gender equality, the transfer of the competence from the Ministry of Interior to the Ministry of Labour and Social Affairs and then the Ministry of Social Cohesion and Family disrupted data coordination. The portfolio changes along with the distribution of discrimination responsibilities to different ministries, a fact that hinders the collection of coordinated statistics. The same applies to human rights competence that shifted from the Ministry of Justice to the recently established Ministry of Social Cohesion and Family. In practice, this affected data collection and overall monitoring activities on human rights. At the same time, the GNCHR noted delays in the re-convening of the National Council against Racism and Intolerance impacting on the evaluation of the previous (2020-2023) National Action Plan against Racism and Intolerance (NAP) and the preparation of the new one.

5. Another example relates to forced labor inspection. Labor and social security databases, the National Statistical Authority (ELSTAT), and the Judiciary are not synchronized, leading to a lack of coherent statistics. This issue is compounded by the non-functioning of the tripartite social dialogue body, Council for Social Control of the Labour Inspectorate (SKEEE), following the transformation of the Labor

* This document reflects GNCHR standard positions and recommendations. Edited by Eva Tzavala, GNCHR Head of the Scientific Staff.

¹ Concluding observations on the initial report of Greece, 29 October 2019, CRPD/C/GRC/CO/1, paras. 46-47.

² Concluding observations on the combined fourth to sixth periodic reports of Greece, 29 June 2022, CRC/C/GRC/CO/4-6, paras. 11, 15, 18, 27, 34, 38, 40, 45.

³ Concluding observations on the combined eighth and ninth periodic reports of Greece, 20 February 2024, CEDAW/C/GRC/CO/8-9, paras. 49-50.

⁴ [Direct Request \(CEACR\)](#), adopted 2017, [Direct Request \(CEACR\)](#), adopted 2020, published 109th ILC session (2021), [Direct Request \(CEACR\)](#), adopted 2019, published 109th ILC session (2021).



Inspection into an Independent Authority under Law 4808/2021. It should be noted that there is no field for recording and registering data concerning the detection of forced labour or trafficking conditions, in the labour and social security databases maintained in the relevant information systems (ERGANI, OPS SEPE, IDIKA, OPS EFKA, etc.). Even more, it should be taken under consideration that those systems are mostly related to the declaration of employment with an employment contract, which however is neither the only nor the usual route of employment of workers in the agricultural sector, which is usually done through a labour ticket (“ergosimo”).

6. On racial discrimination, hate crime and hate speech, the GNCHR identified its Written Observations prior to the List of Themes several structural issues that hinder the effective implementation of antiracism laws. The recording of racist-related cases is poor, and convictions by national courts remain limited. Gaps persist in monitoring the implementation of the relevant legal framework, as it is still not possible to monitor all cases from the investigation stage until the final adjudication of the case. While there are public statistics regarding the reported incidents to the Police, **relevant statistics on the cases that have reached the justice system and their final outcome are not available.**

7. The Racist Violence Recording Network (RVRN) operated by the GNCHR (together with UNHCR Greece) was established in 2011 on the basis of two major findings in that period: a) the identified absence of an official and effective data collection system on racist violence and b) the need to coordinate organization which recorded, on their own initiative, incidents of racist violence against people who sought their services. There have been many improvements since in this direction, such as the creation of a state system for recording racist violence, however RVRN recordings of such incidents remain necessary, as complementary to the official ones.

8. Based on most recent RVRN [Annual Report 2023](#), 158 incidents of racist violence have been recorded between January and December 2023. Among these incidents, 89 targeted migrants, refugees, or asylum seekers, while 61 targeted LGBTQI+ individuals. Nearly half of the victims had experienced violence before, and 15 incidents involved victims targeted for multiple characteristics. Notably, minors were identified as victims in one-third of the incidents, with some minors also acting as perpetrators. According to statistics of incidents of racist violence shared with the RVRN by the Hellenic Police, in the same reporting period (year 2023), 129 incidents were recorded by the official state authorities.

9. RVRN's data are the “tip of the iceberg” but capture a clear picture of the quantitative and qualitative trends of racist violence in Greece. **The RVRN remains the most effective mechanism for the avoidance of underreporting of hate crime in Greece to date.** Its data constitute a reference point for national, regional and international human rights bodies (for instance the NCRI, the CoE's ECRI, the OSCE/ODIHR) when planning or assessing relevant laws and policies.